



TELANGANA STATE POLLUTION CONTROL BOARD

Paryavarana Bhavan, A-III, Industrial Estate, Sanathnagar, Hyderabad-500 018

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BY REGD. POST WITH ACK. DUE

Order No. MDK-150/TSPCB/UH-II/2017- 274

Dt:12.06.2020

Sub :	TSPCB - M/s. Arch Pharma Labs Ltd., Sy. No. 323, Gundlamachanoor (V), Hatnoora (M), Sangareddy District - Water (Prevention and Control of Pollution) Amendment Act, 1988 - Air (Prevention and control of Pollution) Amendment Act, 1987 - Industry representation for revocation of stop production orders- Non-compliance of the consent conditions & Board directions - <u>STOP PRODUCTION ORDERS - ISSUED</u> - Reg.
Ref :	<ol style="list-style-type: none">1. Consent & HWA Order No. CFO&HWA Order No. TSPCB/RCP/SRD/CFO&HWA/HO/2016-2366 dated 02.12.2016.2. Telephonic complaint received from the villagers of Gundlamachanoor (V), Hatanoora (M) of Sangareddy District on 04.04.2017.3. Order No.MDK-150/TSPCB/UH-II/2017-1293, Dt:20.07.2017.4. Board received complaints (in writing and telephonic) regarding discharge of contaminated water by the industry into a nearby culvert.5. Closure Order No. MDK-150/TSPCB/UH-II/2017-267, Dt:01.05.2018.6. Temporary Revocation of Closure Order No.MDK-150/TSPCB/UH-II/2017-539, Dt: 11.05.2019.7. The Board received regular complaints regarding smell nuisance from the students & faculty members of IIT, Hyderabad with campus located at Kandi (V), Sangareddy District.8. Complaint received on 02.07.2019 against the industry regarding discharge of effluents into the natural drain passing through the industry.9. Stop Production Order No. MDK-150/TSPCB/UH-II/2017-1123, Dt:07.08.2019.10. Temporary Permission to Continue Production Activity Order No.MDK-150/TSPCB/UH-II/2017-2339, Dt:29.01.2020.11. WP (PIL) No.22 of 2020 filed in the Hon'ble High Court for the state of Telangana at Hyderabad by Mr Saimolla Mogulaiah, Resident of Sangareddy District regarding pollution caused by the bulk drug industries located in Gundlamachanoor (V), Hatnoor (M), Sangareddy District namely M/s.Covalent Laboratories Pvt. Ltd., M/s. Honour Labs Ltd., M/s. AurobindoPharma Ltd., Unit-IX and M/s. Arch Pharma Labs Ltd. , located at Gundlamachanoor (V), Hatnoora (M), Sangareddy District.12. The special team constituted by the Zonal Office for inspection with regard safety measure taken by the industry.13. Industry's request letter dated 11.05.2020 for revocation of Stop Production Order submitted to this Office on on 03.06.2020.14. Inspection of the industry by this Office Officials on 28.05.2020.15. Hearing held on 09.06.2020.

1. **WHEREAS**, you are operating the industry in the name of style of M/s. Arch Pharma Labs Ltd., locating at Sy. No. 323, Gundlamachanoor (V), Hatnoora (M), Sangareddy District.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO&HWA to the industry for manufacturing of certain bulk drugs & drug intermediates vide order dated 02.12.2016 for a period upto 30.06.2021.
3. **WHEREAS**, vide reference 2nd cited, telephonic complaint received from the villagers of Gundlamachanoor (V), Hatanoora (M) of Sangareddy District on 04.04.2017 regarding pollution problems from the industry.
4. **WHEREAS**, the Board reviewed the industry before the Task Force Committee during the meeting held on 29.06.2017. As per the recommendations of the Committee, the Board vide reference 3rd cited, issued certain directions to the industry on 20.07.2017 in connection with complaints.

5. **WHEREAS**, vide reference 4th cited, again the Board received complaints regarding discharge of contaminated water by the industry into a nearby culvert.
6. **WHEREAS**, the Board again reviewed the industry before the Task Force Committee during the meeting held on 28.04.2018. As per the recommendations of the Committee, vide reference 5th cited, the Board issued Closure order to the industry for not complying with consent conditions & directions and for causing water, air pollution and smell nuisance in the surrounding area.
7. **WHEREAS**, vide reference 6th cited, the Board issued Temporary Revocation of Closure Order to the industry on 11.05.2018 for a period upto 31.12.2018 with certain directions to comply with.
8. **WHEREAS**, vide reference 7th cited, the Board received regular complaints regarding smell nuisance from the students & faculty members of IIT, Hyderabad with campus located at Kandi (V), Sangareddy District and surrounding villagers.
9. **WHEREAS**, vide reference 8th cited, again the Board received complaints on 02.07.2019, against the industry regarding discharge of effluents into the natural drain passing through the industry.
10. **WHEREAS**, the above complaint was reviewed in the Task Force Committee meeting held on 03.08.2019 and as per the recommendations of the Committee, the Board vide reference 9th cited, issued Stop Production orders to the industry on 07.08.2019 in connection with complaints regarding smell nuisance and discharge of effluents.
11. **WHEREAS**, vide reference 10th cited, the Board issued Temporary Permission to Continue Production Activity for a period of Three Months on 29.01.2020 to the industry.
12. **WHEREAS**, vide reference 11th cited, a WP (PIL) No.22 of 2020 filed in the Hon'ble High Court for the state of Telangana at Hyderabad by Mr Saimolla Mogulaiah, Resident of Sangareddy District regarding pollution caused by the bulk drug industries located in Gundlamachanoor (V), Hatnoor (M), Sangareddy District namely M/s.Covalent Laboratories Pvt. Ltd., M/s. Honour Labs Ltd., M/s. AurobindoPharma Ltd., Unit-IX and M/s. Arch Pharma Labs Ltd. , located at Gundlamachanoor (V), Hatnoora (M), Sangareddy District.
13. **WHEREAS**, vide reference 12th cited, the industry was inspected by the special team constituted by the Zonal Office (EE and AEE – I) with regard safety measures taken by the industries in handling MAH Chemicals. Sri. Viswanath, Vice President (Operations) was present during the inspection of the industry. During the inspection, the following were observed:
 1. The scrubbers attached to the production blocks are not in operating condition and process emissions are spreading in the area causing air pollution and odour nuisance.
 2. The scrubber provided to the Phosphoric Acid tank near effluent collection tank was observed to be in dilapidated condition.
 3. Thick fumes were observed from effluent collection tanks.
 4. The industry has stored huge quantity of ETP sludge in the ground level sludge drying beds. The industry has also stored process sludge (tarry in nature) in one of the sludge drying beds.
 5. The industry has stored huge quantity of spent carbon in a shed without roof cover near effluent collection tanks.
 6. The industry is not collecting and treating the canteen waste water in STP. The industry is discharging the same on open ground which resulted in the formation of a lagoon. The overflow from the lagoon is joining the natural drain passing through the industry.
 7. The industry is collecting the MEE condensate in the STP collection tanks.
 8. The industry is operating only stripper & MEE system and not operating the ATFD followed by Nutch filter.
 9. All the tanks including nutch filter were observed to be filled upto brim level with effluent, MEE condensate and MEE concentrate.
 10. The industry is not collecting the spillages near MEE to the tank in tank system properly and the collection of spillage water was observed in the outer tank of tank in tank system.

11. The industry has stored huge quantity of ATFD salt in bags in a shed near MEE.
12. The wet scrubber attached to 6 TPH boiler is not in operating condition.
13. The industry is using below ground level pipelines and intermediate below ground level tanks to transfer effluents from production blocks. The pipelines were observed to be leaking near production blocks and near collection tanks.
14. Some of the tanks and pumps were observed to be leaking near production blocks. The leaked material is being spread on the open ground.
15. The below ground level tank near nitrogen plant was overflowing.
16. The industry is having storage of styrene Drums 25 Nos (200 Lts. each). The industry representative informed that they are using the styrene in manufacturing of Atorvastatin Calcium (@ stage -8). The industry is storing these drums in air conditioned room. This may be examined.
17. The industry installed 4 lakh K.Cal/hr Thermic Fluid Heater (Diesel) and 25,000 K.Cal/hr Thermic Fluid Heater (Electric) without CFE/CFO order of the Board.
18. The officials collected water samples and the results are as below:

5152 Sample collected from drain water (from Canteen) joining natural nala.

5153 Sample collected from over flow water from underground tank near nitrogen tank.

S. No.	Parameter	Units	Results	
			5152	5153
1	pH	-	7.31	7.17
2	Total Suspended Solids (TSS)	mg/L	155	174
3	Total Dissolved Solids (TDS)	mg/L	4,916	7,882
4	Chemical Oxygen Demand (COD)	mg/L	848	1,680
5	Biological Oxygen Demand (BOD)	mg/L	262	475
6	Oil & Grease	mg/L	0.2	0.4

14. **WHEREAS**, vide reference 13th cited, the industry submitted a representation to the Board on 11.05.2020 requesting for revocation of Stop Production Orders.
15. **WHEREAS**, vide reference 14th cited, the Board Officials inspected the industry on 28.05.2020 and submitted the following observations:
 - Compliance of the industry with the directions issued vide Temporary Permission to Re-start The Production Activity dated 29.01.2020:

Sl. No	DIRECTIONS	COMPLIANCE
1.	The industry shall comply with conditions stipulated in CFO&HWA Order scrupulously.	Compliance reported separately.
2.	The industry shall store the effluents in the above ground tanks duly maintaining free board to avoid overflow.	All the tanks including nutch filter at MEE area were observed to be filled upto brim level with effluent, MEE condensate and MEE concentrate. The industry is not collecting the spillages near MEE to the tank in tank system properly and the collection of spillage water was observed in the outer tank of tank in tank system.
3.	The industry shall continuously operate the MEE, ATFD followed by Nutch filter system for treatment of HTDS & LTDS effluent to PETL, Patancheru, duly confirming to the inlet standards of PETL, Patancheru.	The industry is operating only stripper & MEE system and not operating the ATFD followed by Nutch filter.
4.	The industry shall maintain records for the water meters provided at various sections like process, Boiler feed, domestic and cooling tower etc.	Complied.
5.	The industry shall record the daily quantities of waste water generated, collected, treated & reused.	Complied.
6.	The industry shall continuously operate the air pollution control equipments	The wet scrubber attached to 6 TPH boiler is not in operating condition.

	attached to the Boiler and process so as to meet the Stack & AAQ Standards prescribed by the Board.	
7.	The industry shall continuously operate the multi stage scrubbers installed with online pH monitoring system to avoid odour nuisance in the area.	The scrubbers attached to the production blocks are not in operating condition and process emissions are spreading in the area causing air pollution and odour nuisance. The scrubber provided to the Phosphoric Acid tank near effluent collection tank was observed to be in dilapidated condition.
8.	The industry shall ensure that there shall not be any spillages/leakages/overflows to avoid contaminations of rain water. The industry shall not discharge any treated/ untreated waste water outside the premises under any circumstances.	The industry is using below ground level pipelines and intermediate below ground level tanks to transfer effluents from production blocks. The pipelines were observed to be leaking near production blocks and near collection tanks. Some of the tanks and pumps were observed to be leaking near production blocks. The leaked material is being spread on the open ground. The below ground level tank near nitrogen plant was overflowing.
9.	The industry shall provide for arrangement for collection of first runoff contaminated rainwater from the industry premises as directed by the Board vide notice dated:01.05.2019 @ 24 KL/Acre with bypass arrangement for allowing uncontaminated rain water.	Not complied.
10.	The industry shall extend the validity of BG from time to time till further orders of the Board.	Complied.

- Compliance of the industry on CFO / Schedule - B Conditions as per CFO order dated 02.12.2016:

Sl. No	Conditions	Compliance																																																															
	<u>Special Conditions :</u>																																																																
1.	<p>The Pre-treated effluents sending to M/s. PETL, Patancheru should not contain constituents in excess of the tolerance limits mentioned below.</p> <table border="1"> <thead> <tr> <th>Outlet No.</th> <th>Parameter</th> <th>Limiting Standards</th> </tr> </thead> <tbody> <tr> <td>2</td> <td>pH</td> <td>5.50 - 9.00</td> </tr> <tr> <td></td> <td>TDS (Inorganic)</td> <td>5,000 mg/l</td> </tr> <tr> <td></td> <td>Chromium Hexavalent (as Cr+6)</td> <td>2.00 mg/l</td> </tr> <tr> <td></td> <td>Temperature °C</td> <td>45.0</td> </tr> <tr> <td></td> <td>Oil and Grease</td> <td>20.00 mg/l</td> </tr> <tr> <td></td> <td>Phenolic Compounds (as C6H5OH)</td> <td>5.00 mg/l</td> </tr> <tr> <td></td> <td>Ammonical Nitrogen (as N)</td> <td>50.00 mg/l</td> </tr> <tr> <td></td> <td>Cyanide (as CN)</td> <td>2.00 mg/l</td> </tr> <tr> <td></td> <td>Chromium (total) (as Cr)</td> <td>2.00 mg/l</td> </tr> <tr> <td></td> <td>Copper (as Cu)</td> <td>3.00 mg/l</td> </tr> <tr> <td></td> <td>Lead (as Pb)</td> <td>1.00 mg/l</td> </tr> <tr> <td></td> <td>Nickel (as Ni)</td> <td>3.00 mg/l</td> </tr> <tr> <td></td> <td>Zinc (as Zn)</td> <td>15.00 mg/l</td> </tr> <tr> <td></td> <td>Arsenic (as As)</td> <td>0.20 mg/l</td> </tr> <tr> <td></td> <td>Mercury (as Hg)</td> <td>0.01 mg/l</td> </tr> <tr> <td></td> <td>Cadmium (as Cd)</td> <td>1.00 Mg/L</td> </tr> <tr> <td></td> <td>Selenium (as Se)</td> <td>0.05 Mg/L</td> </tr> <tr> <td></td> <td>Fluoride (as F)</td> <td>15.00 Mg/L</td> </tr> <tr> <td></td> <td>Boron (as B)</td> <td>2.00 Mg/L</td> </tr> <tr> <td></td> <td>COD</td> <td>15000 mg/l</td> </tr> </tbody> </table>	Outlet No.	Parameter	Limiting Standards	2	pH	5.50 - 9.00		TDS (Inorganic)	5,000 mg/l		Chromium Hexavalent (as Cr+6)	2.00 mg/l		Temperature °C	45.0		Oil and Grease	20.00 mg/l		Phenolic Compounds (as C6H5OH)	5.00 mg/l		Ammonical Nitrogen (as N)	50.00 mg/l		Cyanide (as CN)	2.00 mg/l		Chromium (total) (as Cr)	2.00 mg/l		Copper (as Cu)	3.00 mg/l		Lead (as Pb)	1.00 mg/l		Nickel (as Ni)	3.00 mg/l		Zinc (as Zn)	15.00 mg/l		Arsenic (as As)	0.20 mg/l		Mercury (as Hg)	0.01 mg/l		Cadmium (as Cd)	1.00 Mg/L		Selenium (as Se)	0.05 Mg/L		Fluoride (as F)	15.00 Mg/L		Boron (as B)	2.00 Mg/L		COD	15000 mg/l	<p>Complied.</p> <p>As per the details furnished, the industry has disposed 1060 KL (@7.06 KLD against consented capacity of 11 KLD) of LTDS effluents to M/s PETL during the period from Jan, 2020 to May, 2020.</p>
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3.	The Industry should file the water Cess returns in Form-I as required under section (5) of Water (Prevention and Control of Pollution) Cess Act, 1977 on or before the 5 th of every calendar month, showing the quantity of water consumed in the previous month along with water meter readings. The	The industry paid water cess upto 31.03.2017 and it was directed to pay the arrears.																																																															

	industry should remit water cess as per the assessment orders as and when issued by Board.										
4.	The emissions should not contain constituents in excess of the prescribed limits mentioned below. <table border="1" data-bbox="261 298 1011 424"> <thead> <tr> <th>Chimney No.</th> <th>Parameter</th> <th>Emission Standards</th> </tr> </thead> <tbody> <tr> <td>1&2</td> <td>SPM</td> <td>115 mg/Nm³</td> </tr> <tr> <td>3.</td> <td>HCl</td> <td>35 mg/Nm³</td> </tr> </tbody> </table>	Chimney No.	Parameter	Emission Standards	1&2	SPM	115 mg/Nm ³	3.	HCl	35 mg/Nm ³	--
Chimney No.	Parameter	Emission Standards									
1&2	SPM	115 mg/Nm ³									
3.	HCl	35 mg/Nm ³									
5.	The industry should comply with ambient air quality standards of Pm ₁₀ (Particulate Matter size less than 10 µm) - 100 µm /m ³ , PM _{2.5} (Particulate Matter size less than 2.5 µm) -60 µm /m ³ SO ₂ - 80 µm /m ³ , NO _x 80 µm /m ³ ,NH ₃ -400 µm /m ³ 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: (6AM to 10 PM) - 75 dB (A) Night time: (10PM to 6 AM) - 70 dB (A)	--									
6.	The industry shall manufacture only the consented products.	Complied.									
7.	The industry shall not increase the capacity beyond the permitted capacity, without obtaining CFE & CFO of the Board.	As per the details furnished, the industry has manufactured an average quantity of consented products of 718.75 Kgs/day against the consented quantity of 766.66 kg/day from Jan, 2020 to April, 2020.									
8.	The industry shall segregate the HTDS & LTDS effluents.	Complied.									
9.	The industry shall regularly operate the Pollution control systems for treatment of HTDS effluents in Stripper, Multiple Effect Evaporator (MEE), ATFD, etc.	The industry is operating only stripper & MEE system and not operating the ATFD followed by Nutch filter.									
10.	The industry shall remove the Forced Evaporation reactors immediately which were earlier installed for Evaporation of HTDS effluents. The FE reactors shall not be used for evaporation of HTDS effluents under any circumstances.	Complied.									
11.	The industry shall lift the LTDS effluents, along with condensate of MEE & ATFD, to PETL, Patancheru, duly confirming to the inlet standards of PETL, Patancheru.	Complied.									
12.	The industry should not discharge any effluents on land within or outside the plant premises.	The industry is not collecting and treating the canteen waste water in STP. The industry is discharging the same on open ground which resulted in the formation of a lagoon. The overflow from the lagoon is joining the natural drain passing through the industry. The industry is not collecting the spillages near MEE to the tank in tank system properly and the collection of spillage water was observed in the outer tank of tank in tank system. The industry is using below ground level pipelines and intermediate below ground level tanks to transfer effluents from production blocks. The pipelines were observed to be leaking near production blocks and near collection tanks. Some of the tanks and									

		pumps were observed to be leaking near production blocks. The leaked material is being spread on the open ground.
13.	The industry shall obtain Revocation of Closure Order from CPCB before commencing the production activity.	Complied.
14.	The industry shall immediately dispose the stored FE salts & ETP Sludge to TSDF, Dundigal. The industry shall immediately dispose Organic Residue & Spent Carbon to Cement Industries for Co-processing.	The industry has stored huge quantity of ETP sludge in the ground level sludge drying beds. The industry has also stored process sludge (tarry in nature) in one of the sludge drying beds. The industry has stored huge quantity of spent carbon in a shed without roof cover near effluent collection tanks. The industry has stored huge quantity of ATFD salt in bags in a shed near MEE.
15.	The industry shall install & operate water meters for recording category-wise water consumption viz. Process, Boiler feed, Cooling tower makeup, Domestic etc.	Complied.
16.	The industry shall provide and operate digital flow meters for recording waste water generation at inlet of various effluent streams of HTDS & LTDS, viz., Stripper feed; MEE feed; MEE condensate; steam flow to Stripper, MEE & ATFD; effluents lifted to PETL, Patancheru, etc.	Complied
17.	The industry shall install & operate online VOC analyzers for monitoring of VOCs.	Not Complied.
18.	The industry shall operate Multi-stage Scrubbers in the plant for control of process emissions, so as to avoid odour nuisance. The details of chemicals consumption used in the scrubber should be recorded and kept accessible for the inspection officials of the Board.	The scrubbers attached to the production blocks are not in operating condition and process emissions are spreading in the area causing air pollution and odour nuisance.
19.	The industry shall operate online pH meters for the Multi-stage scrubbers.	The scrubber provided to the Phosphoric Acid tank near effluent collection tank was observed to be in dilapidated condition. Not provided online pH meters.
20.	The industry shall maintain separate energy meter for the pollution control systems and maintain the records of the same for verification by the inspecting officers of the Board.	Complied.
21.	The industry shall store all the chemical containing drums and residue drums in closed shed.	Not complied.
22.	The industry shall provide & use vent condensers for all the bulk storage tanks, storing highly volatile solvents.	Complied.
23.	The industry shall install & operate IP camera with PAN, TILT Zoom, 5x or above focal length, with night vision capability, along with flow meter, with connection of the same to the website of CPCB & TSPCB.	Provided.
24.	The industry shall comply with the directions issued by the Task Force from time to time.	Reported above.
25.	The industry shall comply with the stipulations and conditions prescribed in the earlier CFO Order.	--
26.	The industry should develop and maintain green belt all along the boundary of the industry and other vacant places. The industry shall take up extensive plantation under the Haritha Haram program of the State Government.	The industry has developed green belt.
27.	The industry should maintain the following records and the same should be made available to the Board Officials during the inspection.	Maintained.

	<ul style="list-style-type: none"> a. Daily production details, RG-I records and Central Excise Returns. b. Daily solid waste generated and disposed to TSDF & Cement units for Co-processing. c. Log Books for pollution control systems. d. Quantity of low TDS Effluents generated and lifted to PETL, Patancheru. e. Quantity of high TDS Effluents generated and forced evaporated. 	
28.	There should not be any spillages / discharges of chemicals / effluents on ground. The drums containing chemicals & wastes should be stored on elevated platform provided with leachate / spillages collection pit. In no case the drums should be stored on naked ground.	Reported.
29.	The industry should evaluate the performance of solvent recovery system for each stream-wise and shall maintain the efficiency of solvent recovery more than 95%.	--
30.	Under no circumstances the industry should burn the Hazardous Waste in the boiler.	Complied.
31.	As per G.O.Rt.No.286, the industry should transport the industrial effluents and plying on the roads is allowed between 6 A.M. to 6 P.M. only.	The industry is directed to comply.
32.	The industry should maintain the 6-Copy manifest system for transport of effluents to the CETP.	
33.	The industry should collect the effluents in above Ground level effluent storage tanks only.	Complied.
34.	All reactions involving solvents should be operated closed loop only.	--
35.	Industry should control fugitive emissions by properly maintaining chilled brine circulation, closed room operations and condensers with receivers.	The industry was directed to comply.
36.	The industry shall maintain log books on the following: <ul style="list-style-type: none"> 1. Hydraulic loads of effluent generation 2. Characteristics of effluents 3. Quantity of effluents generated, evaporated & lifted to CETP. 4. Furnish consolidated daily records on the above periodically once in three months to the RO. 	Reported.
37.	Separate meters with necessary pipe-line should be provided for assessing the quantity of water used for each of the purposes mentioned below: <ul style="list-style-type: none"> a. Industrial cooling, boiler feed. b. Domestic purposes. c. Process, whereby water gets polluted and pollutants are easily bio degradable. d. Processing, whereby water gets polluted and the pollutants are not easily bio - degradable. 	Provided.
38.	Rain water shall not be allowed to mix with either trade or domestic effluents. Industry shall provide storm water drains immediately.	Complied.
39.	The evaporation losses in solvents should be controlled by taking the following measures: <ul style="list-style-type: none"> 1. Chilled brine circulation to effectively reduce the solvent losses into the atmosphere. 2. Transfer of solvents by using pumps and closed conveyance instead of manual handling. 3. Closed centrifuges be used due to which solvent losses are reduced drastically. 4. The reactor vents connected with primary & secondary condensers to catch the solvent vapours. 5. All the solvent storage tanks are connected with vent condensers to prevent solvent vapours. 	---
40.	Proper earthing should be provided in all the electrical equipment wherever solvent handling is done.	Directed to comply
41.	System of leak detection and repair of pump / pipeline shall be installed in the plant and immediate response team should be identified for preventive maintenance.	Directed to comply
42.	The industry shall isolate the storage of highly flammable chemicals, solvents & other raw materials from the rest of facilities in the plant premises.	Complied.
43.	Inclusion of returns of the production details of other / their	--

	sister concern units in the existing industry's Excise Returns is not be permitted under any circumstances.	
44.	The industry shall maintain good house keeping both within the factory and in the premises.	The house keeping is poor.
45.	Trading of finished /semi finished products of OTHER INDUSTRIES and its inclusion in the existing industry's Excise Returns shall not be permitted under any circumstances.	--
46.	The returns of products manufactured and the Excise returns should reflect concurrency.	--
47.	The industry shall submit mock drill report carried out at least once in six months, as required under the Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989.	--
48.	The applicant shall submit Environment Statement in Form V before 30th September of every year as per Rule No.14 of E (P) Rules, 1986 & Amendments.	--
49.	The conditions are without prejudice to the rights and contentions of this Board in any court of law.	--

16. **WHEREAS**, vide reference 15th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 30.12.2019. The industry representative has attended the meeting.

The Committee noted that, WP (PIL) No. 22 of 2020 filed in the Hon'ble High Court for the State of Telangana at Hyderabad by Mr Saimolla Mogulaiah, Resident of Sangareddy District regarding pollution caused by the Bulk Drug industries located in Gundlamachanoor (V), Hatnoor (M), Sangareddy District namely M/s.Covalent Laboratories Pvt. Ltd., M/s. Honour Labs Ltd., M/s. AurobindoPharma Ltd., Unit-IX and M/s. Arch Pharma Labs Ltd. , located at Gundlamachanoor (V), Hatnoora (M), Sangareddy District. The case is posted for hearing on 15.06.2020.

The Committee noted that, the scrubbers attached to the production blocks are not in operating condition, the scrubber provided to the Phosphoric Acid tank near effluent collection tank was observed to be in dilapidated condition, stored huge quantity of spent carbon in a shed without roof cover near effluent collection tanks, not collecting and treating the canteen waste water in STP. The industry is discharging the same on open ground which resulted in the formation of a lagoon, operating only stripper & MEE system and not operating the ATFD followed by Nutch filter. All the tanks including nutch filter were observed to be filled upto brim level with effluent, stored huge quantity of ATFD salt in bags in a shed near MEE, the wet scrubber attached to 6 TPH boiler is not in operating condition, using below ground level pipelines and intermediate below ground level tanks to transfer effluents from production blocks. The pipelines were observed to be leaking near production blocks and near collection tanks. Some of the tanks and pumps were observed to be leaking near production blocks. The leaked material is being spread on the open ground.

The industry representative informed that, due to COVID-19 the industry is not in operation to the full capacity and only 40% production is being carried out. The migrant work force are not available due to which the industry could not take up the maintenance works. He informed that they have rectified some of the lapses during the last week and requested to give 15 days time to comply with the non compliance observed by the Board.

After detailed discussion, the Committee recommended to issue Stop Production Orders to your industry with certain directions to comply with.

17. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue Stop Production Orders to your industry with following directions to comply with:**

1. The industry shall Stop all the Production Activities immediately and shall restart only after obtaining prior permission from the Board.
2. The industry shall store the effluents in the above ground tanks duly maintaining free board to avoid overflow.
3. The industry shall continuously operate the stripper MEE, ATFD for treatment of HTDS & shall lift LTDS effluent to PETL, Patancheru, duly confirming to the inlet standards of PETL, Patancheru.

4. The industry shall ensure that there shall not be any spillages/leakages/overflows to avoid contaminations of rain water. The industry shall not discharge any treated/ untreated waste water outside the premises under any circumstances.
 5. The industry shall provide Multi Stage Scrubber with online pH meter to the all production blocks to control the process emissions so as to avoid the odour nuisance to the surrounding area.
 6. The industry shall provide scrubber with online pH meter to the Phosphoric Acid tank near effluent collection tank to control odour nuisance.
 7. The industry shall cover domes for effluent collection tanks to avoid smell nuisance.
 8. The industry shall ensure that there shall not be any spillages MEE area and shall properly collect the same.
 9. The industry shall dispose present stock of hazardous waste to TSDF/ Cement plants as per the hazardous waste authorization.
 10. The industry shall store solvent drums, raw material drums and hazardous waste containing drums etc,. under dedicated closed shed provided with elevated lined platform having dyke wall and leachate collection sump to avoid runoff water contamination during rains. In no case the drums should be stored in naked open ground.
 11. The industry shall ensure that the wet scrubber attached to 6 TPH boiler shall be in continuous operation and separate energy meters shall be provided.
 12. The industry shall treat the domestic effluents / canteen waste water in STP. The industry shall not discharge any waste water outside the industry premises under any circumstance.
18. These directions are issued under Sec.33 (A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under Sec. 31 (A) of Air (Prevention and Control of Pollution) Amendment Act, 1987.
19. The above mentioned directives shall be implemented by the industry, failing which legal action will be initiated against your industry under Sec.33 (A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under Sec. 31 (A) of Air (Prevention and Control of Pollution) Amendment Act, 1987 directing closure of the industry in the interest of Public Health and Environment.

Sd/-
MEMBER SECRETARY

To
M/s. Arch Pharma Labs Ltd.,
Sy. No. 323, Gundlamachanoor (V),
Hatnoora (M), Sangareddy District.

Copy to:

1. The District Collector & Magistrate, Medak for kind information.
2. The JCEE, Z.O., R.C.Puram for information and necessary action.
3. The Environmental Engineer, Regional Office, Sangareddy, for information and necessary action. He is directed to **inspect the industry and furnish latest status on compliance of directions to take further necessary action.**
4. Concerned file.

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


Senior Environmental Engineer (FAC)
(UH-V)

