TELANGANA STATE POLLUTION CONTROL BOARD



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BY REGD. POST WITH ACK. DUE

Order No. MDK-150/TSPCB/UH-V/2017-

Dt:22.07.2020

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's representation for revocation of stop production orders - TEMPORARY PERMISSION TO RE-START THE PRODUCTION ACTIVITY FOR A PERIOD OF THREE MONTHS - ORDERS ISSUED - Reg.
Ref:	 Consent & HWA Order No. CFO&HWA Order No. TSPCB/RCP/SRD/CFO&HWA/HO/2016-2366 dated 02.12.2016. Directions Order No.MDK-150/TSPCB/UH-II/2017-1293, Dt:20.07.2017. Board received complaints (in writing and telephonic) regarding discharge of contaminated water by the industry into a nearby culvert. Closure Order No. MDK-150/TSPCB/UH-II/2017-267, Dt:01.05.2018. Temporary Revocation of Closure Order No.MDK-150/TSPCB/UH-II/2017-539, Dt: 11.05.2019. The Board received regular complaints regarding smell nuisance from the students & faculty members of IIT Hyderabad with campus located at Kandi (V), Sangareddy District. Complaint received on 02.07.2019 against the industry regarding discharge of effluents into the natural drain passing through the industry. Stop Production Order No. MDK-150/TSPCB/UH-II/2017-1123, Dt:07.08.2019. Temporary Permission to Re-start the Production Activity Order No.MDK-150/TSPCB/UH-II/2017-2339, Dt:29.01.2020. 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. Stop Production Order No.MDK-150/TSPCB/UH-II/2017-274, Dt:12.06.2020. Industry's representation dated:26.06.2020. Industry's representation dated:26.06.2020. Ingection of the industry by the Board Officials on 30.06.2020 &
	01.07.2020.

- 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**, the Board vide reference 2nd cited, issued certain directions to the industry on 20.07.2017 in connection with complaints regarding pollution problems.
- 4. **WHEREAS**, vide reference 3rd cited, again the Board received complaints regarding discharge of contaminated water by the industry into a nearby culvert.
- 5. **WHEREAS**, the Board 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 4th cited, the Board issued Closure Order to the industry on 01.05.2018 for not complying with consent conditions & directions and for causing water, air pollution and smell nuisance in the surrounding area.

- 6. **WHEREAS**, vide reference 5th 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.
- 7. **WHEREAS,** vide reference 6th 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.
- 8. **WHEREAS,** vide reference 7th 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.
- 9. **WHEREAS,** the above complaints 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 8th cited, issued Stop Production orders to the industry on 07.08.2019.
- 10. **WHEREAS,** vide reference 9th cited, the Board issued Temporary Permission to Restart the Production Activity for a period of Three Months on 29.01.2020 to the industry with certain directions to comply with.
- 11. **WHEREAS**, vide reference 10th 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.
- 12. **WHEREAS,** the Board Officials inspected the industry on with regard safety measures taken by the industry in handling MAH Chemicals and certain non compliance observed.
- 13. **WHEREAS**, the Board reviewed the industry before the Task Force Committee during the meeting held on 09.06.2020. As per the recommendations of the Committee, vide reference 11th cited, the Board issued Stop Production Order to the industry on 12.06.2020 for not complying with consent conditions & directions and for causing water, air pollution and smell nuisance in the surrounding area.
- 14. **WHEREAS,** vide reference 12th cited, the industry submitted a representation to the Board on 26.06.2020 for revocation of stop production orders.
- 15. **WHEREAS,** vide reference 13th cited, the RO, Sangareddy Officials inspected the industry and its premises on 30.06.2020 & 01.07.2020 and the following observations were made:
 - During inspection, Sri. Viswanath, Vice President (Operations) was present.
 - During the inspection, it was observed that the industry stopped the production operations. The compliance report of the industry on the directions issued in the Stop Production Order dated 12.06.2020, directions issued in the earlier Revocation of Stop Production Order and the CFO conditions is reported below:
 - Compliance report of the industry on the directions issued in the Stop Production Order dated 12.06.2020:

SI. No	DIRECTIONS	COMPLIANCE
1.	The industry shall Stop all the Production Activities immediately and shall restart only after obtaining prior permission from the Board.	Complied. During the inspection, the industry is not in operation.
2.	The industry shall store the effluents in the above ground tanks duly maintaining free board to avoid overflow.	treatment area are almost full. No
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	issue of Stop Production Order by the

	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.	Complied. During the inspection, it was observed that the industry started the works for collection of contaminated rain water.
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.	Complied. The industry provided double stage scrubbers to the three (all) production blocks. The industry provided online pH meter to the HCl scrubber and to the other scrubber. The industry has not provided online pH meter to the ammonia scrubber, as the scrubbing media is water. The industry vide letter dated 25.06.2020 submitted that they have placed order for the third online pH meter.
6.	The industry shall provide scrubber with online pH meter to the Phosphoric Acid tank near effluent collection tank to control odour nuisance.	The industry informed that this scrubber is used very occasionally, whenever there is a campaign of Chlorides production. The industry further informed that they proposed to completely revamp the scrubber and shall place online pH meter, for which Purchase Order has been placed and the work will be completed by 20.07.2020.
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.	Complied. The industry arranged tank in tank system for collecting the spillages.
9.	The industry shall dispose present stock of hazardous waste to TSDF/ Cement plants as per the hazardous waste authorization.	As per the details furnished by the industry, it was observed that the industry has disposed 51.38 tons of Solid Waste to TSDF. The industry representative informed that they have paid advance to TSDI facility and will dispose the remaining waste lying in the premises.
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.	a shed with roof cover, 3 feet heigh walls on four sides and leachate collection system with dedicated pump. The industry was directed to revamp the shed in which the few bags of spen
11.		The industry informed that they have serviced defective pump and they will provide separate energy meter by 30.07.2020
12.	The industry shall treat the domestic effluents / canteen waste water in STP. The industry shall not discharge	The industry made arrangements to

any waste water outside the industry premises under any circumstance.

• Compliance of the industry with the directions issued vide Temporary Permission to Re-start The Production Activity dated:29.01.2020.

SI. 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.	The effluent collection tanks near HTDS treatment area are almost full. No overflow of effluent was observed. The industry representative informed that they have not operated the HTDS treatment system after issuance of Stop Production Order by the Board.
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.	During the inspection, the industry is not in operation. The industry representative informed that they have not operated the HTDS treatment system after issuance of Stop Production Order by the Board. The industry representative informed that they have disposed 300 KL of LTDS to PETL after issuance of Stop Production Order.
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 attached to the Boiler and process so as to meet the Stack & AAQ Standards prescribed by the Board.	scrubber attached to 6 TPH boiler was observed to be not in operating condition. The industry representative informed that
7.	The industry shall continuously operate the multi stage scrubbers installed with online pH monitoring system to avoid odour nuisance in the area.	During the inspection, the industry is not in operation. The compliance on providing scrubbers with online pH monitoring system is reported above.
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.	Complied. No spillages/leakages/overflows were observed during the inspection. During the inspection, it was observed that the industry started the works for collection
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.	the industry started the works for collection of contaminated rain water.
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:

SI. No	Conditions	Compliance
1.	The Pre-treated effluents sending to M/s. PETL, Patancheru should not contain constituents in excess of the tolerance limits mentioned below.	Complied. The industry representative informed that they have disposed 300 KL of LTDS to PETL after issuance of Stop Production
	Outlet No. Parameter Limiting Standards 2 pH 5.50 - 9.00 100	Order.
2.	The industry should take steps to reduce water consumption to the extent possible and consumption should NOT exceed the Quantities mentioned below.	Complied.
	S. No Purpose Quantity 1. Process & Washings 14.847 KLD 2. Reactor Washings/ Floor Washings 4.0 KLD 3. Boiler Feed 72.0 KLD 4. Cooling 26.0 KLD 5. DM Plant/ Softener Plant 1.0 KLD 6. Gardening 20.0 KLD 7. Domestic 6.0 KLD Total 143.847 KLD	
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 industry should remit water cess as per the assessment orders as and when issued by Board.	The industry paid water cess upto 31.03.2017 and it was directed to pay the arrears.
4.	The emissions should not contain constituents in excess of the prescribed limits mentioned below.	
	Chimney No. Parameter Emission Standards 1&2 SPM 115 mg/Nm³ 3. HCl 35 mg/Nm³	
5.	The industry should comply with ambient air quality standards of $Pm_{10}(Particulate\ Matter\ size\ less\ than\ 10\ \mu m)$ -100 $\mu m\ /m^3$, $PM_{2.5}$ (Particulate Matter size less than 2.5 μm) -60 $\mu m\ /m^3\ SO_2$ – 80 $\mu m\ /m^3$, $NO_x\ 80\ \mu m\ /m^3$, NH_3 -400 $\mu m\ /m^3$ 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)-75dB	
6.	(A) Night time: (10 PM to 6 AM) – 70 dB (A) The industry shall manufacture only the	
7.	consented products. The industry shall not increase the capacity beyond the permitted capacity, without obtaining CFE & CFO of the Board.	1
8.	The industry shall segregate the HTDS & LTDS effluents.	

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9.	The industry shall regularly operate the Pollution control systems for treatment of	
	HTDS effluents in Stripper, Multiple Effect	The industry was directed to
10.	Evaporator (MEE), ATFD, etc. The industry shall remove the Forced	comply with this condition. Complied.
10.	Evaporation reactors immediately which were	Compiled.
	earlier installed for Evaporation of HTDS	
	effluents. The FE reactors shall not be used for	
	evaporation of HTDS effluents under any circumstances.	
11.	The industry shall lift the LTDS effluents,	Complied.
	along with condensate of MEE & ATFD, to	
	PETL, Patancheru, duly confirming to the inlet	
12.	standards of PETL, Patancheru. The industry should not discharge any	Papartad
12.	effluents on land within or outside the plant	Reported.
	premises.	
13.	The industry shall obtain Revocation of	Complied.
	Closure Order from CPCB before commencing the production activity.	
14.	The industry shall immediately dispose the	Reported.
	stored FE salts & ETP Sludge to TSDF,	,
	Dundigal. The industry shall immediately	
	dispose Organic Residue & Spent Carbon to Cement Industries for Co-processing.	
15.	The industry shall install & operate water	Complied.
	meters for recording category-wise water	•
	consumption viz. Process, Boiler feed, Cooling	
16.	tower makeup, Domestic etc. The industry shall provide and operate digital	Complied
10.	flow meters for recording waste water	Complica
	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.	
17.	The industry shall install & operate online VOC	The industry submitted the PO
18.	analyzers for monitoring of VOCs. The industry shall operate Multi-stage	copy placed for VOC meter. Reported.
-0.	Scrubbers in the plant for control of process	Reported.
	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.	
19.	The industry shall operate online pH meters	
20.	for the Multi-stage scrubbers. The industry shall maintain separate energy	Reported.
20.	meter for the pollution control systems and	Reported.
	maintain the records of the same for	
	verification by the inspecting officers of the	
21.	Board. The industry shall store all the chemical	Complied.
۲.	containing drums and residue drums in closed	- Compiled:
	shed.	
22.	The industry shall provide & use vent	Complied.
	condensers for all the bulk storage tanks, storing highly volatile solvents.	
23.	The industry shall install & operate IP camera	Provided.
	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.	
24.	The industry shall comply with the directions	Reported above.
	issued by the Task Force from time to time.	
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.	green belt.
27.	The industry should maintain the following records and the same should be made available to the Board Officials during the inspection. 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.	Maintained.
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 streamwise 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.	•
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.	comply.
36.	The industry shall maintain log books on the following: 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.	
37.	Separate meters with necessary pipe-line should be provided for assessing the quantity of water used for each of the purposes mentioned below: a. Industrial cooling, boiler feed. b. Domestic purposes. c. 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.	
38.	Rain water shall not be allowed to mix with either trade or domestic effluents. Industry	1

	shall provide storm water drains immediately.	
39.	 The evaporation losses in solvents should be controlled by taking the following measures: Chilled brine circulation to effectively reduce the solvent losses into the atmosphere. Transfer of solvents by using pumps and closed conveyance instead of manual handling. Closed centrifuges be used due to which solvent losses are reduced drastically. The reactor vents connected with primary & secondary condensers to catch the solvent vapours. 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 observed to be improved and the industry was directed to maintain good house keeping.
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, after careful consideration of all the material facts of the case, the Board hereby issue Temporary Permission to Re-start the Production Activity for a period of Three Months to your industry with following directions to comply:-

- 1. The industry shall comply with the Board directions & Consent conditions scrupulously.
- 2. The industry shall segregate effluent into HTDS& LTDS effluent and shall collect same in the above ground level tanks only and duly maintaining sufficient free board to avoid overflow.
- 3. The industry shall continuously operate the stripper, MEE, ATFD for treatment of HTDS effluents and shall lift LTDS effluent to PETL, Patancheru along with condensate duly confirming to the inlet standards of PETL, Patancheru.
- 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 cover domes for effluent collection tanks to avoid smell nuisance within 7 days.
- 6. 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.
- 7. 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.
- 8. The industry shall provide scrubber with online pH meter to the phosphoric acid tank near effluent collection tank to control odour nuisance within 15 days.
- 9. The industry shall regularly operate 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.
- 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 dispose present stock of hazardous waste to TSDF/ Cement plants as per the hazardous waste authorization.
- 12. The industry shall ensure that there shall not be any spillages MEE area and shall properly collect the same.
- 13. The industry shall install online VOC monitoring system and connect the same to the Board website within 15 days.
- 14. The industry shall comply with the standard operating procedure (SOPs) specified by the solvent recovery system.
- 15. The industry shall extend the validity of Bank Guarantee submitted to the Board from time to time before expiry, till further orders of the Board.
- 17. 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.
- 18. 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 Magistrate & Collector, Sangareddy for kind information.
- 2. The JCEE, Z.O., R.C.Puram for information and also directed to close monitor to the industry for compliance to take further 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.

Senior Environmental Engineer (FAC)

(UH-V)

