



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-195/TSPCB/UH-V/2019- 148

Dt:09.05.2020

Sub : TSPCB - M/s Venkata Raghava Labs Pvt Ltd., (Formerly M/s SKR Chemicals), Sy.No. 172, Anantharam Village, Gummadidala Mandal, Sangareddy District - Water (Prevention and Control of Pollution) Amendment Act, 1988 and Air (Prevention and Control of Pollution) Amendment Act, 1987 - Industry's request for revocation of Closure Order - **TEMPORARY REVOCATION OF CLOSURE ORDER FOR A PERIOD OF THREE MONTHS - ORDERS ISSUED** - Reg.

Ref :

1. CFO Order No. APPCB/ZO/RCP/RCPM/81/W&A/2007-69, Dt 23.04.2007.
2. Industry's CFO renewal application dt 11.03.2013.
3. EC Order No. F.No.J-11011/306/2009/-IA II(I) Dt. 22.03.2013.
4. CFE (Expansion) Order No. 05/TSPCB/CFE/RO-RCP-II/HO/2016 Dt. 09.05.2016.
5. Closure Order No.MDK-195/TSPCB/UH-V/2019-295, Dt:08.05.2019.
6. CFO Order No. TSPCB/ZO/RCP/RCPM/81/CFO/2020-235, Dt.13.02.2020.
7. Industry's representation dated:14.02.2020 for revocation of closure order.
8. Inspection of the industry by the Board Officials on 27.02.2020.
9. Again, industry submitted a representation on 09.04.2020.

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1. **WHEREAS**, you are operating the industry located at Sy.No. 172, Anantharam Village, Gummadidala Mandal, Sangareddy District.
2. **WHEREAS**, vide reference 1st cited, the industry (M/s SKR Chemicals) has obtained CFO&HWA order dt: 23.04.2007 from the Board to manufacture Recovery of Solvents - IPA, Toluene, Acetone, Ethyl Acetate and Methanol from MLs. 10,000 Ltrs/Month & Sodium Acetate Recovery from MLs.10,000 Ltrs/Month **which was expired on 31.12.2009**.
3. **WHEREAS**, vide reference 2nd cited, the industry applied for CFO renewal of the Board for recovery of solvent from spent solvent. But not issued CFO renewal.
4. **WHEREAS**, vide reference 3rd cited, the industry has obtained EC vide order dt 22.03.2013 and vide reference 4th cited obtained CFE from the Board vide order dt:09.05.2016 to manufacture 20 Bulk Drugs & intermediates and Recovery of Solvents - IPA, Toluene, Acetone, Ethyl Acetate and Methanol to the tune of 360 TPA.
5. **WHEREAS**, vide reference 5th cited, the Board issued Closure Orders to the industry on 08.05.2019, dispensing the opportunity of hearing, for operating the industry without consents of the Board and non compliance of the Board conditions.
6. **WHEREAS**, vide reference 6th cited, the Board issued CFO&HWA order dt:13.02.2020 to carryout Recovery of solvents IPA, Toluene, Acetone, Ethyl Acetate, Methanol - 10,000 ltrs / Month and Sodium Acetate Recovery from ML's - 10,000 ltrs / Month with validity period upto 31.01.2021 with conditions that, the industry shall start production only after obtaining revocation of closure order issued by the Board on 08.05.2019, As committed during the CFO meeting, the industry shall manufacture existing products only and shall not manufacture Bulk drugs without obtaining CFO for expansion of the Board under any circumstances.
7. **WHEREAS**, vide reference 7th cited, the industry submitted a representation 14.02.2020 requesting for revocation of closure orders and the same is forwarded to RO seeking detailed report.

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DESPATCHED
ON 13/5/2020

8. **WHEREAS**, vide reference 8th cited, the RO, RC Puram Officials inspected the industry and its surroundings on 27.02.2020 and the following observations were made:

- During inspection, Sri. Bhadri, In-charge of the industry was present and following observations were made:
- The industry was not in operation and the power was disconnected.
- The latest status on compliance of reasons mentioned in closure order dated 08.05.2019 are as follows:

S. No.	Reasons mentioned in closure order dated 08.05.2019	latest status of Compliance
1.	The industry was in operation without having valid CFO&HWA order of the Board.	The industry has obtained CFO & HWA vide order dt 13.02.2020 to carryout Recovery of solvents IPA, Toluene, Acetone, Ethyl Acetate, Methanol – 10,000 ltrs / Month and Sodium Acetate Recovery from ML's - 10,000 ltrs / Month with validity period up to 31.01.2021 the industry shall start production only after obtaining revocation of closure order issued by the Board on 08.05.2019, As committed during the CFO meeting, the industry shall manufacture existing products only and shall not manufacture Bulk drugs without obtaining CFO for expansion of the Board under any circumstances.
2.	The industry is having 1 No of production block and during the inspection the reactors and cooling tower are in operation. The industry has stored about 50 Nos. of MS / HDPE Drums containing raw material / chemicals/acids in the process area.	During inspection the industry was not in operation as the industry was issued with closure orders. The industry is having Production Blocks A & B. The industry has provided single stage scrubber to production block B.
3.	The industry is operating coal fired boiler capacity 1.0 TPH without providing APCE and chimney. The industry has stored coal and coal ash on naked ground.	The industry is having coal fired boiler of capacity 1.0 TPH. The industry has provided dust collector as APCE to control boiler emissions.
4.	The industry is discharging boiler blow downs on ground within the premises.	During the inspection the industry was not in operation and no discharges were observed.
5.	The industry has stored about 500 Nos of MS / HDPE Drums containing spent solvents / chemicals in a shed without taking any safety measures.	The industry stored about 500 Nos. of drums containing spent solvents in a shed.
6.	The industry has not provided effluents storage tank, no effluents storage were observed in the premises. Effluent spillage marks was observed back side of the production block.	The industry has provided above ground level PFRP tank of capacity 20 KL for storage of effluents. During inspection no spillages were observed.
7.	The industry is not maintaining any records for water consumption, wastewater generation & its disposal, hazardous waste generation and its disposal.	The industry provided records and informed that they will maintain the records after restart of the operations.
8.	The house keeping of the entire industry is poor.	Housekeeping is satisfactory.

Remarks:

1. M/s Venkata Raghava Labs Pvt Ltd., (Formerly known as M/s SKR Chemicals), is located at Sy. No. 172, Anantharam Village, Gummadidala Mandal, Sangareddy District and engaged in distillation of solvents.
2. The industry was issued with Combined CFO & HWA vide order dt23.04.2007 with validity up to 31.12.2009 to carryout Solvent Recovery (Recovery of solvents IPA, Toluene, Acetone, Ethyl Acetate, Methanol – 10,000 ltrs / Month and Sodium Acetate

Recovery - 10,000 ltrs / Month.

3. The industry applied renewal for CFO& HWA for the above products on 08.12.2009 and the CFO verification report was submitted Board office 05.03.2010 for further processing. The Board office vide Ir dt. 22.12.2010 directed the industry to obtain CFE for change of product mix and then approach the Board for Consent for Operation (CFO) for change product mix as they have already applied for expansion and public hearing was conducted.
4. The industry obtained EC vide order dt 22.03.2013 to manufacture 20 Bulk Drugs to the tune of 360 TPA. Subsequently, the industry has obtained CFE for Expansion vide order dt 09.05.2016 to manufacture Bulk Drugs & Intermediates with 20 bulk drugs (i.e., worst combination of any 3 products) with total production capacity of 1000 Kgs/day. Subsequently, the industry became sick.
5. The Board has issued Closure Orders dt: 08.05.2019 to the industry for operating the industry without valid CFO&HWA order of the Board and non compliance of the Board conditions.
6. The industry has obtained renewed CFO & HWA vide order dt 13.02.2020 to carryout Recovery of solvents IPA, Toluene, Acetone, Ethyl Acetate, Methanol - 10,000 ltrs / Month and Sodium Acetate Recovery from ML's - 10,000 ltrs / Month with validity period up to 31.01.2021 the industry shall start production only after obtaining revocation of closure order issued by the Board on 08.05.2019, As committed during the CFO meeting, the industry shall manufacture existing products only and shall not manufacture Bulk drugs without obtaining CFO for expansion of the Board under any circumstances.
7. The industry has provided mechanical flow meter at raw water sump to assess the actual consumption of raw water and provided records.
8. The industry has provided SRP plant with single column of capacity 4.0 KLD with primary and secondary condensers for recovery of solvents. The industry is having two production blocks with 3 GLR, 13 SS reactors. The industry has provided single stage scrubber to one production block.
9. The industry is having bulk storage tanks of capacity 1X 20 KL and 1X 30 KL for storage of fresh solvents. The industry has provided vent condensers to the storage tanks.
10. The industry has not provided VOC analyzer.
11. The industry has provided PFRP tank of capacity 20 KL for storage of effluents. The industry is having forced evaporation system for evaporation of effluents.
12. The industry is having coal fired boiler of capacity 1.0 TPH. The industry has provided dust collector as APCE to control boiler emissions.
13. The industry has provided fire hydrant system.
14. The industry has provided separate shed with concreted platform, dyke walls & leachate collection system for storage of hazardous waste and storage of raw materials.

9. **WHEREAS**, vide reference 9th cited, again, the industry submitted a representation on 09.04.2020 stating that, they are manufacturers of IPA and other alcohol based solvents from the spent solvents by distillation process and they are chain linked processors of the essential activities like Pharmaceuticals and supply chain to the manufacturers of Disinfectants. In view to supply the IPA and other alcohol based solvents to the manufacturers, the industry requested to restore the power supply to support both Pharmaceuticals and sanitizers manufacturers in this critical situation stating that they are complying all the conditions mentioned in the closure order and applied for revocation of closure order.

10. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue Temporary Revocation of Closure Order to your industry for a period of Three Months with the following directions to comply with:**

1. The industry shall not operate without valid Consent of the Board.
2. The industry shall comply with CFO&HWA conditions and directions issued by the Board scrupulously.
3. The industry shall manufacture consented products only and shall restrict the production to permitted capacity.

4. The industry shall restrict the quantities of production, products, water consumptions including the recycled water, waste water generation & disposal, hazardous waste generation & disposal etc., within the permitted quantities mentioned in the CFO order and shall maintain the records separately.
5. The industry shall regularly operate FE system to treat the effluents and the FE condensate shall be recycled.
6. The industry shall not discharge any effluents / seepages / spillages / leakages / overflows within the premises and outside the industry premises.
7. The drums & bags of chemicals / solvents / in process goods / waste material etc., shall be stored on elevated platform in a closed shed with dyke walls and spillage collection system.
8. The industry shall maintain good housekeeping within the plant premises.
9. The industry shall comply with the Standard Operating Procedure (SOP) specified for solvent recovery plants by CPCB.
10. The industry shall submit the Bank Guarantee of Rs.1.0 Lakh towards compliance of the above directions in favour of the Member Secretary, TSPCB, Hyderabad for a period of one year at concerned Regional office within in a week and shall extend from time to time till further orders of the Board.
11. **WHEREAS**, the TSSPDC., Ltd., has been directed to extend the power supply to your industry for a period of Three Months from the date of this order.
12. **WHEREAS**, these directions are issued under Sec.33 (A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and section 31(A) of the Air (Prevention and Control of pollution) Amendment act, 1987.
13. **WHEREAS**, you are hereby directed to note that, should you misuse these orders to operate the unit violating any of the conditions mentioned above , your unit will be closed under section 33(A) of the Water (Prevention and Control of Pollution) Amendment Act, 1988 and section 31(A) of the Air (Prevention and Control of Pollution) Amendment act, 1987 and you will also be liable for prosecution in the court of Metropolitan Magistrate or Judicial Magistrate of the first class under section 41(2)of the Water (Prevention and Control of Pollution) Amendment Act, 1988 and under section 37(1) of the Air (Prevention and Control of Pollution) Amendment Act, 1987 the punishment for which includes imprisonment for a term which shall not be less than one year six months and which may be extended to six years with fine.

Sd/-
MEMBER SECRETARY

To
M/s Venkata Raghava Labs Pvt. Ltd.,
(Formerly M/s SKR Chemicals), Sy.No. 172,
Anantharam Village, Gummadidala Mandal,
Sangareddy District.

Copy to:

1. The Managing Director, Telangana State Southern Power Distribution Company Ltd., Mint compound, Near Secretariat, Hyderabad for information and necessary action.
2. The District Collector, Sangareddy Dist. for favour of kind information.
3. The Superintending Engineer (Operations), Telangana State Southern Power Distribution Company Ltd., Sangareddy District.
4. The JCEE, Z.O, R.C.Puram for information and necessary action.
5. The Environmental Engineer, Regional Office, RC Puram for information and necessary action. **He is directed to monitor the industry for compliance of the directions issued and shall submit status report soon after completion of stipulated time.**
6. Concerned file.

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


Senior Environmental Engineer (FAC)
(UH-V)



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Order No.MDK-195/TSPCB/UH-V/2019- 149

Dt:09.05.2020

Sub:	TSPCB - M/s Venkata Raghava Labs Pvt Ltd., (Formerly M/s SKR Chemicals), Sy.No. 172, Anantharam Village, Gummadidala Mandal, Sangareddy District - Water (Prevention and Control of Pollution) Amendment Act, 1988 & Air (Prevention and Control of Pollution) Amendment Act, 1987 - TEMPORARY RESTORATION OF POWER SUPPLY ORDERS FOR A PERIOD OF THREE MONTHS - ORDERS ISSUED - Reg.
Ref :	1. Order No.MDK-195/TSPCB/UH-V/2019-296, Dt:08.05.2019.. 2. Industry representation dated:14.02.2020 & 09.04.2020 3. Order No.MDK-195/TSPCB/UH-V/2019- Dt:09.05.2020.

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In the 1st reference mentioned above, orders under section 33(A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under section 31(A) of Air (Prevention and Control of Pollution) Amendment Act, 1987 were issued to TSSPDCL to disconnect the power supply to **M/s Venkata Raghava Labs Pvt Ltd., (Formerly M/s SKR Chemicals), Sy.No. 172, Anantharam Village, Gummadidala Mandal, Sangareddy District.**

In the 2nd reference cited, the industry submitted representation to the Board for revocation of closure orders stating that they have complied with directions issued by the Board.

After careful consideration of all the material facts of the case, it was decided to revoke the closure orders issued to the industry. Accordingly, the Board issued Temporary Revocation of Closure Orders to your industry for a period of Three Months vide reference 3rd cited. A copy of the temporary revocation of closure order is herewith enclosed.

In view of the above, the Board hereby directs the TSSPDCL to restore the power supply to **M/s Venkata Raghava Labs Pvt Ltd., (Formerly M/s SKR Chemicals), Sy.No. 172, Anantharam Village, Gummadidala Mandal, Sangareddy District for a period of Three Months from the date of this order** for carrying out the production activities. These directions are issued under section 33(A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under section 31(A) of Air (Prevention and Control of Pollution) Amendment Act, 1987.

Sd/-
MEMBER SECRETARY

To
**The Superintending Engineer (Operations),
Telangana State Southern Power Distribution Company Ltd.,
Sangareddy District.**

Copy to:

1. The Managing Director, Telangana State Southern Power Distribution Company Ltd., Mint compound, Near Secretariat, Hyderabad for information and necessary action.
2. The JCEE, Z.O, R.C.Puram for information and necessary action.
3. The E.E., TSPCB, Regional Office, RC Puram, for information and necessary follow up action.
4. Concerned file.

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

**Senior Environmental Engineer (FAC)
(UH-V)**

