



# VASUDHA PHARMA CHEM LIMITED

Unit-III : Plot No. 23, 24, Jawaharlal Nehru Pharma City, Parawada, Visakhapatnam-531019, Andhra Pradesh, INDIA.

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Website : www.vasudhapharma.com

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

Location: Factory  
Date: 25/06/2020

Dear Sir,

Sub: Submission of CFO compliance Report – reg

We are here with CFO compliance Report of Vasudha Pharma Chem Limited, Unit III  
having Consent order No: APPCB/VSP/VSP/212/HO/CFO/2019 -733.

This is for your information and records please

Thanking you,

For Vasudha Pharma Chem Ltd., Unit – III,

  
Authorized Signatory

J. Srinivaas,  
Head, Mfg.works

Encl: CFO compliance Report

CC: The Environmental Engineer, A.P. Pollution Control Board, Regional Office, Madhavadhara,  
VUDA Layout, Beside RTO Office, Visakhapatnam – 530 018.

**CFO (Unit-III) – CONDITIONS COMPLIANCE**  
**(Consent order no. APPCB/VSP/VSP/212/HO/CFO/2019, dated 15.02.2019)**

**SCHEDULE - A**

Date: 25-06-2020

S.No	CONDITION	Vasudha Response
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.	Noted and Agreed
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.	Noted and Agreed. Ambient air quality monitoring stack emission monitoring and analysis of waste water are being done every month by external agency and parameters are within the limits. The monitoring reports are being submitted to ROVSP, APPCB
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.	Agreed and Complied.
4	The industry should put up two sign boards (6x4 ft. each) at publicly visible places at the main gate indicating the products, effluent discharge standards, air emission standards, hazardous waste quantities and validity of CFO and exhibit the CFO order at a prominent place in the factory premises.	Complied. Provided in front of Factory Main gate
5	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.	Noted and Agreed



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.	Noted and Complied
7	The applicant should make applications through Online for renewal of Consent (under Water and Air Acts) and Authorization under HWM Rules at least 120 days before the date of expiry of this order, along with prescribed fee under Water and Air Acts and detailed compliance of CFO conditions for obtaining Consent & HW Authorization of the Board. The industry should immediately submit the revised application for consent to this Board in the event of any change in the raw material used, processes employed, quantity of trade effluents & quantity of emissions. Any change in the management shall be informed to the Board. The person authorized should not let out the premises / lend / sell / transfer their industrial premises without obtaining prior permission of the State Pollution Control Board.	Noted. CFO Order received in the month of 15/02/2019 with validity up to 30 <sup>th</sup> day of November, 2023
8	Any person aggrieved by an order made by the State Board under Section 25, Section 26, Section 27 of Water Act, 1974 or Section 21 of Air Act, 1981 may within thirty days from the date on which the order is communicated to him, prefer an appeal as per Andhra Pradesh Water Rules, 1976 and Air Rules 1982, to Appellate authority constituted under Section 28 of the Water(Prevention and Control of Pollution) Act, 1974 and Section 31 of the Air(Prevention and Control of Pollution) Act, 1981.	Noted



**SCHEDULE-B**

S. No	CONDITION	Vasudha Response																														
1	<p>The industry shall handover the original Consent order No. APPCB/SP/SP/212/HO/CFO/2017, dated 09.02.2017 having validity up to 30.11.2021 to the RO, Visakhapatnam after receipt of this order and the same stands cancelled from the date of receipt of this order.</p>	<p>Noted and Submitted in Regional office, APPCB, Visakhapatnam on 19/02/2019</p>																														
<p><b>WATER POLLUTION:</b></p>																																
<p>The source of water is JNPC supply. The following is the permitted water consumption:</p>																																
<table border="1"> <thead> <tr> <th data-bbox="922 315 975 427">Sl. No</th> <th data-bbox="922 427 975 931">Purpose</th> <th data-bbox="922 931 975 1256">Quantity (KLD)</th> </tr> </thead> <tbody> <tr> <td data-bbox="863 315 916 427">1</td> <td data-bbox="863 427 916 931">Process</td> <td data-bbox="863 931 916 1256">74.70</td> </tr> <tr> <td data-bbox="804 315 857 427">2</td> <td data-bbox="804 427 857 931">Washings</td> <td data-bbox="804 931 857 1256">5.00</td> </tr> <tr> <td data-bbox="745 315 798 427">3</td> <td data-bbox="745 427 798 931">Boiler Feed</td> <td data-bbox="745 931 798 1256">50.00</td> </tr> <tr> <td data-bbox="686 315 738 427">4</td> <td data-bbox="686 427 738 931">Cooling Towers Makeup</td> <td data-bbox="686 931 738 1256">50.00</td> </tr> <tr> <td data-bbox="627 315 679 427">5</td> <td data-bbox="627 427 679 931">Scrubber</td> <td data-bbox="627 931 679 1256">5.00</td> </tr> <tr> <td data-bbox="568 315 620 427">6</td> <td data-bbox="568 427 620 931">QC Lab</td> <td data-bbox="568 931 620 1256">3.00</td> </tr> <tr> <td data-bbox="509 315 561 427">7</td> <td data-bbox="509 427 561 931">Domestic</td> <td data-bbox="509 931 561 1256">10.00</td> </tr> <tr> <td data-bbox="450 315 502 427">8</td> <td data-bbox="450 427 502 931">Gardening</td> <td data-bbox="450 931 502 1256">10.00</td> </tr> <tr> <td colspan="2" data-bbox="391 315 443 427"><b>Total</b></td> <td data-bbox="391 427 443 1256"><b>207.70KLD</b></td> </tr> </tbody> </table>			Sl. No	Purpose	Quantity (KLD)	1	Process	74.70	2	Washings	5.00	3	Boiler Feed	50.00	4	Cooling Towers Makeup	50.00	5	Scrubber	5.00	6	QC Lab	3.00	7	Domestic	10.00	8	Gardening	10.00	<b>Total</b>		<b>207.70KLD</b>
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3	<p>Digital flow meters with totalizers with necessary pipelines shall be provided so as to assess the water used for different purposes within 1 month and maintain them properly and also maintain the records of the readings.</p>	<p>We arranged analog flow meters to assess water used for different purposes.</p>																														



The LTDS effluents sent to CETP, Pharmacity shall not contain constituents in excess of the tolerance limits mentioned below, as per their MOU with Ramky Pharma City.

Outlet	Parameter	Concentration in mg/l
	pH	6.50 – 8.50
	Temperature °C	<45°C
	TDS	12,000 mg/l
	TSS	600 mg/l
	BOD	3,000 mg/l
	COD	8,000 mg/l
	Oil and Grease	20 mg/l
	Chromium Hexavalent (as Cr+6)	2 mg/l
	Chromium (total) (as Cr)	2 mg/l
	Ammonical Nitrogen (as N)	30 mg/l
	Cyanide (as CN)	0.20 mg/l
	Lead (as Pb)	1 mg/l
	Nickel (as Ni)	3 mg/l
	Zinc (as Zn)	15 mg/l
	Arsenic (as As)	0.20 mg/l
	Mercury (as Hg)	0.01 mg/l

(\* The industry shall segregate the HTDS and LTDS effluent streams and the effluents which are not meeting the above standards shall be treated as HTDS effluents and shall be sent CETP of Pharmacity for evaporation.)

5 The industry shall install and maintain Electro Magnetic flow meters with totalizers for effluent quantity measurement for HTDS & LTDS effluent immediately. The industry shall install and maintain web camera for flow meters and connect the same to the PCB immediately.

Noted and Complied

6 The LTDS and HTDS effluents shall be stored in above ground level collection tanks separately.

Noted and Complied

Agreed. The LTDS effluents sent to Ramky are well within the tolerance limits.



7	Effluents shall not be discharged on land or any water bodies or aquifers or outside under any circumstances. Floor washings shall be admitted into effluent collection system only and shall not be allowed to find their way into storm water drains or open areas.	Noted and Being Complied
8	The industry shall maintain rainwater runoff tank for collection and storage of first flush storm water. The industry shall maintain dry condition outside drains in non-rainy season.	Noted and Being Complied
9	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 after characterization.	Noted and Being Complied
10	The drums containing chemicals / solvents shall be stored under a roof on elevated platform with a provision to collect leakages / spillages in the collection pit.	Noted and Complied
11	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.	Noted and Being complied
12	The industry shall maintain proper manifest system for effluent transported to CETP. They shall submit monthly reports to the E.E., RO Visakhapatnam.	Noted and Being complied
13	The industry shall submit the details of quantity of High TDS and Low TDS effluents sent to CETP of Pharmacy every month to the RO, Visakhapatnam.	Noted and Being complied.

**AIR POLLUTION:**

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

14	Chimney No.	Parameter	Emission Standards	Complied. Emissions are within the prescribed limits only
	1 & 2	Particulate matter	100 mg/NM <sup>3</sup>	
	3	Acid mist	35 mg/Nm <sup>3</sup>	



15	<p>The industry shall comply with ambient air quality standards of PM10 (Particulate Matter size less than 10 microns) - 100 micro gram/ m<sup>3</sup>; PM2.5 (Particulate Matter size less than 2.5 microns) - 60 micro gram/m<sup>3</sup>; SO<sub>2</sub> - 80 micro gram/ m<sup>3</sup>; NO<sub>x</sub> - 80 micro gram/m<sup>3</sup>, 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-1, dated 18.11.2009.</p> <p>Noise Levels: Day time (6 AM to 10 PM) - 75 dB (A) Night time (10 PM to 6 AM) - 70 dB (A)</p>	<p>Complied. Ambient air quality monitoring is being done every month by external agency and parameters are within the limits. The monitoring reports are being submitted to ROVSP, APPCB</p>
16	<p>The industry shall comply with emission limits for DG sets of capacity up to 800 KW as per the Notification G.S.R.520 (E), dated 01.07.2003 and G.S.R.448 (E), dated 12.07.2004 under the Environment (Protection) Act Rules. 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.</p>	<p>Noted and Agreed</p>
17	<p>The industry shall operate the two stage scrubber for scrubbing of process emissions at all emission sources.</p>	<p>Noted and Complied</p>
18	<p>The industry shall maintain multi stage scrubber with online pH meters to control gaseous emissions. The scrubbed solutions shall be recycled to the maximum extent. The details of chemicals consumption used in the scrubber shall be recorded and kept accessible for the inspection officials of the Board.</p>	<p>Noted and Being complied</p>
19	<p>The industry shall maintain auto recording system to the online pH measuring facility of the scrubber and report compliance to Regional Office, Visakhapatnam. Scrubber solution shall be recycled as far as possible and finally sent to CETP of Pharmacy for further treatment.</p>	<p>Noted and Complied</p>
20	<p>The industry shall maintain online VOC analyzer and the monitoring records shall be submitted to the RO-Visakhapatnam.</p>	<p>Noted and Complied</p>
21	<p>The evaporation losses in solvents shall be controlled by taking suitable measures, which include: i. Chilled brine circulation to effectively reduce the solvent losses into the atmosphere. ii. Transfer of solvents by using pumps and closed conveyance instead of manual handling.</p>	<p>i. In all processes we are using chilled water or chilled brine circulation for product cooler. ii. Transferring solvents by using centrifugal pumps in closed conveyance.</p>



	<p>iii. Closed centrifuges be used due to which solvent losses are reduced drastically.</p> <p>iv. The reactor vents connected with primary &amp; secondary condensers to catch the solvent vapours.</p> <p>v. All the solvent storage tanks are connected with vent condensers to prevent solvent vapours.</p>	<p>iii. We are using closed centrifuges</p> <p>iv. Reactor vents are connected primary condensers Primary and secondary condensers.</p> <p>v. Noted and We are in process to connect all solvent storage tanks with vent condensers.</p>
22	The industry shall not use odour causing substances such as Mercaptan or cause odour nuisance in the surroundings.	Noted and Taken all the measures to control the odour nuisance
23	The industry shall provide the hood on the top of the effluent storage tank within 3 months as committed in the CFO committee meeting held on 08.02.2019	Noted and complied.
24	The industry shall inform the APPCB, Regional Office during maintenance Air pollution control equipments.	Noted and Agreed
<b>GENERAL:</b>		
25	The industry shall update the information in OCEMS - Industry Information Data Entry Software for Compliance Reporting Protocol in PART-II (Sections F & G) Every Quarter on 1st January, 1st April, 1st July and 1st October through this software system.	Noted and Being Complied
26	The industry shall submit the information regarding usage of Ozone Depleting Substance once in six months to the Board.	Noted and Being Complied
27	The industry shall maintain online real time monitoring (web camera) facilities to flow meters as per CPCB guidelines.	Complied
28	The industry shall not manufacture any product, other than those mentioned in this order.	No other product is manufactured other than consent products.
29	<p>The industry shall maintain the following records and the same shall be made available to the inspecting officers of the Board:</p> <p>a. Daily production details (ER-1 Central Excise Returns).</p> <p>b. Quantity of Effluents generated, treated, recycled/reused and disposed to CETP.</p> <p>c. Log Books for pollution control systems.</p> <p>d. Characteristics of effluents and emissions.</p>	Being Complied. All the records are maintained.





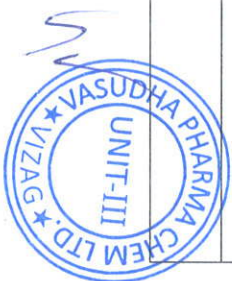
	e. Hazardous/non-hazardous solid waste generated and disposed. f. Inspection book g. Manifest copies of effluents / hazardous waste.																	
30	The industry shall submit AAQ monitoring reports conducted by Authorized Agency every month.	Complied. Submitting AAQ monitoring reports to RO VSP, APPCB on monthly basis																
	The industry shall dispose solid waste (NON HAZARDOUS ) as follows:																	
31	<table border="1"> <thead> <tr> <th>S. No.</th> <th>Name of the Solid Waste</th> <th>Quantity</th> <th>Disposal</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Coal ash</td> <td>3.8 TPD</td> <td>Disposed to Brick Manufacturers</td> </tr> <tr> <td>2.</td> <td>Paper, cotton waste &amp; packing materials i.e. wood, carton &amp; ropes etc.</td> <td>500 Kgs/ month</td> <td>Sale to outside agencies/recyclers</td> </tr> <tr> <td>3.</td> <td>Metal scrap (MS, SS, GI &amp; Aluminium)</td> <td>2 TPM</td> <td></td> </tr> </tbody> </table>	S. No.	Name of the Solid Waste	Quantity	Disposal	1.	Coal ash	3.8 TPD	Disposed to Brick Manufacturers	2.	Paper, cotton waste & packing materials i.e. wood, carton & ropes etc.	500 Kgs/ month	Sale to outside agencies/recyclers	3.	Metal scrap (MS, SS, GI & Aluminium)	2 TPM		Complied
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32	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 1 month.	Complied. At present we have green belt at site and also along the boundary of the industry. Due to space constraint in the plant we have developed greenery in 3 acres at various areas in Lalankoduru Village, Rambilli mandal, Visakhapatnam, Andhra Pradesh. Hence, We request you to kindly consider the above information.																



**SCHEDULE - C**  
[See rule 6(2)]

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

S.No	CONDITION	Vasudha Response
1	The authorized person shall comply with the provisions of the Environment (Protection) Act, 1986, and the rules made there under.	Noted and Agreed
2	The authorization shall be produced for inspection at the request of an officer authorized by the State Pollution Control Board.	Noted and Agreed
3	The person authorized shall not rent, lend, sell, transfer or otherwise transport the hazardous and other wastes except what is permitted through this authorization.	Noted and Agreed
4	Any unauthorized change in personnel, equipment or working conditions as mentioned in the application by the person authorized shall constitute a breach of his authorization.	Noted and Agreed
5	The person authorized shall implement Emergency Response Procedure (ERP) for which this authorization 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.	Noted and Being complied.
6	The person authorized 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".	Noted and Agreed
7	It is the duty of the authorized person to take prior permission of the State Pollution Control Board to close down the facility.	Noted and Agreed
8	An application for the renewal of an authorization shall be made as laid down under these Rules.	Noted and Agreed
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.	Noted and shall be followed
<b>Specific Conditions:</b>		
10	Annual return shall be filed by June 30th for the period ensuring 31 <sup>st</sup> March of the year.	Noted and Being Complied



11	The industry shall enter an agreement with the Cement industries for disposal of incinerable waste or shall dispose to Alternative Fuel Raw material facility (AFRF) OR to TSDF for co-incineration.	Noted and Agreed
12	The industry shall transport the hazardous waste to cement industries through GPS vehicle.	Noted and Being complied
13	The industry shall not store hazardous waste for more than 90 days as per the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016.	Noted and Being complied
14	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.	Noted and Being complied
15	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.	Noted and Agreed. As per APPCB instructions we are transporting and disposing hazardous waste through APPCB Online manifest system through online.
16	The industry shall maintain proper records for Hazardous and Other Wastes stated in Authorization 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.	Noted and Being complied
	The industry shall submit the condition wise compliance report of the conditions stipulated in Schedule A, B & C of this Order on half yearly basis to Board Office, Vijayawada and concerned Regional Office.	Noted and Being complied

