



# VASUDHA PHARMA CHEM LIMITED

UNIT-V, Plot No-24,24A & 24B, APSEZ-DENOTIFIED Area, Rambilli (M), Atchutapuram-531 011,  
Visakhapatnam District, Andhra Pradesh, INDIA.

Phones : +91-8924-663666  
E-mail : mwu5@vasudhapharma.com

Website : www.vasudhapharma.com

To,  
The Member Secretary,  
AP Pollution Control Board,  
D.No. 33-26-14 D/2, Near Sunrise Hospital,  
Pushpa Hotel Centre, Chalamvari Street, Kasturibaipet,  
Vijayawada – 520 008

Location: Factory  
Date: 23-06-2020

Dear Sir,


Sub: Submission of CFO compliance Report – reg.

We are here with CFO compliance Report of Vasudha Pharma Chem Limited,  
Unit V having CONSENT ORDER NO: APPCB/VSP/VSP/409/HO/CFO/2019 Dated. 09/03/2019

This is for your information and records please.

Thanking you,

For Vasudha Pharma Chem Ltd., Unit – V,

  
Authorized Signatory,  
Ch.Subrahmanyam,  
Head, Mfg. works.

Encl: CFO compliance Report

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

**CONDITION WISE COMPLIANCE REPORT ON CONSENT ORDER FOR OPERATION ISSUED BY  
A.P.POLLUTION CONTROL BOARD**

TO

**M/S. VASUDHA PHARMA CHEM LTD (UNIT-V)**

**Ref: CONSENT ORDER NO: APPCB/VSP/VSP/409/HO/CFO/2019 Dt. 09/03/2019**

**Amendment to the CFO order No: APPCB/VSP/VSP/409/CFO/HO/2019 Dt. 25.06.2019**

**SCHEDULE – A**

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.	Agreed and shall be followed
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.	Complied. (The analysis and monitoring reports are being submitted to APPCB on monthly basis.)
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 shall be followed
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.	Agreed
6	The applicant shall submit Environment statement in Form V before 30 <sup>th</sup> September every year as per Rule No.14 of E (P) Rules, 1986 & amendments thereof.	Noted and Complied.



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7	<p>The applicant should make applications through Online for renewal of Consent (under Water and Air Acts) and Authorization under H&amp;OW (M&amp;TM) Rules, 2016 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 &amp; 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 &amp; 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.</p>	<p>Noted. CFO Order received in the month of 09/03/2019 with validity up to 31/01/2022</p>
8	<p>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.</p>	<p>Noted</p>



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**SCHEDULE-B**

1.	The industry shall send the pre treated effluent to CETP, JN Pharma city, till the CETP Atchutapuram is commissioned. If the capacity of CETP, JNPC is not sufficient in future, then the permission to send effluents to CETP of JNPC, will be withdraw.	Noted and Agreed																																	
<b>WATER POLLUTION</b>																																			
2.	<p>The source of water is APIIC Supply. The following is the permitted water consumption:</p> <table border="1" data-bbox="651 1016 1070 1912"> <thead> <tr> <th>S.No</th> <th>Purpose</th> <th>Quantity (KLD)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Process</td> <td>144.0</td> </tr> <tr> <td>2</td> <td>Washings (Reactor &amp; Floor washings)</td> <td>10.0</td> </tr> <tr> <td>3</td> <td>Scrubber</td> <td>10.0</td> </tr> <tr> <td>4</td> <td>R&amp;D, QC</td> <td>4.0</td> </tr> <tr> <td>5</td> <td>DM Plant Regeneration</td> <td>0.0</td> </tr> <tr> <td>6</td> <td>Boiler Feed</td> <td>50.0</td> </tr> <tr> <td>7</td> <td>Cooling Tower Makeup</td> <td>50.0</td> </tr> <tr> <td>8</td> <td>Domestic</td> <td>12.0</td> </tr> <tr> <td>9</td> <td>Gardening</td> <td>15.0</td> </tr> <tr> <td></td> <td>Total</td> <td>295.0</td> </tr> </tbody> </table>	S.No	Purpose	Quantity (KLD)	1	Process	144.0	2	Washings (Reactor & Floor washings)	10.0	3	Scrubber	10.0	4	R&D, QC	4.0	5	DM Plant Regeneration	0.0	6	Boiler Feed	50.0	7	Cooling Tower Makeup	50.0	8	Domestic	12.0	9	Gardening	15.0		Total	295.0	Being Complied
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3.	Digital flow meters with totalizers with necessary pipelines shall be provide so as to assess the water used for different purposes and maintain then properly maintain the records of the readings.	Noted and Being Complied																																	



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**TO**

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**Ref: CONSENT ORDER NO: APPCB/VSP/VSP/409/HO/CFO/2019 Dt. 09/03/2019**

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4. The LTDS effluents sent to CETP, Pharma city shall not contain constituents in excess of the tolerance limits mentioned below, as per there MoU with M/s Ramky pharma city.

Outlet	Parameter	Concentration in mg/l
2	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

Noted and Being Complied

The industry shall segregate the HTDS and LTDS effluents streams and the effluents which are not meeting the above standards shall be treated as HTDS effluents and shall be send to CETP of Pharm city for evaporation.



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5.	The industry shall install and maintain electromagnetic flow meters with totalizer for effluent quality measurement for HTDS & LTDS effluent immediately. The industry shall provide and maintain web camera and flow meters immediately. The data shall be connected to the APPCB and CPCB servers before starting operations.	Complied
6.	The LTDS and HTDS effluent shall be stored in above ground collection tanks separately.	Complied
7.	Effluents shall not be discharged on land or any water bodies or aquifers 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.	Agreed and shall be followed.
8.	The industry shall provide and maintain rainwater runoff tanks for collection and storage of first flush storm water for first 15 minutes of rain by the end of April-2019 as committed by the industry vide letter dt:28.02.2019. The industry shall maintain dry condition outside drains in non-rainy season.	Noted and Complied
9.	Container & Container liners shall be detoxified at the specified covered platform with dyke wall and wash waste water shall be routed to Low TDS collection tank after characterization.	Noted and Complied
10.	The industry shall comply with CPCB directions dated 05.02.2014/02.03.2015 and guideline 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
11.	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
12.	The industry shall submit the details of quantity of High TDS and Low TDS effluents sent to CETP of Pharma city every month to the RO, Visakhapatnam.	Noted and Being Complied



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<b>AIR POLLUTION:</b>								
13.	<p>The emissions shall not contain constituents in excess of the prescribed limits mentioned below:</p> <table border="1"> <thead> <tr> <th>Chimney No.</th> <th>Parameter</th> <th>Emission Standards</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Particulate matter</td> <td>115 mg/Nm<sup>3</sup></td> </tr> </tbody> </table>	Chimney No.	Parameter	Emission Standards	1	Particulate matter	115 mg/Nm <sup>3</sup>	Noted and Being Complied.
Chimney No.	Parameter	Emission Standards						
1	Particulate matter	115 mg/Nm <sup>3</sup>						
14.	<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>; SO2 - 80 micro gram/m<sup>3</sup>; NOx - 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-I, dated 18.11.2009. Noise Levels: Day time (6 AM to 10 PM) - 75 dB (A) Night time (10 PM to 6 AM) - 70 dB (A)</p>	<p>Complied. We are conducting Environmental Monitoring (Ambient Air Quality, Stack Monitoring, Noise level) every month by approved third party and submitting reports to ROVSP, APPCB on monthly basis.</p>						
15.	<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>	Noted and Being Complied						
16.	<p>The industry shall provide multi stage scrubbers to the process vents to control the process emissions. The industry shall provide and maintain on line pH measuring facility with auto recording system to the scrubbers by end of April-19 as committed by the industry vide letter dt: 28.02.2019.</p>	Noted and Complied						
17.	<p>The industry shall maintain multi stage scrubbers along with online pH meters.</p>	Noted and Complied						
18.	<p>The industry shall maintain auto recording system to the online pH measuring facility of the scrubber and report complains to Regional office, Visakhapatnam. Scrubber solution shall be recycled as far as possible and finally send to CETP of Pharma city for further treatment.</p>	Noted and Being Complied						

**Date: 23-06-2020**



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19.	The industry shall maintain online VOC analyzer and the monitoring records shall be submitted to the RO-Visakhapatnam.	Noted and Being Complied (Annexure Attached)
20.	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.	i. In all processes we have chilled water and chilled brine circulation for product coolers.
ii.	Transfer of solvents by using pumps and closed conveyance instead of manual handling.	ii. We are transferring solvents by using centrifugal pumps.
iii.	Closed centrifuges be used due to which solvent losses are reduced drastically.	iii. Complied
iv.	The reactor vents connected with primary & secondary condensers to catch the solvent vapours.	iv. Reactors vents are connected with primary, secondary and tertiary and condensers.
v.	All the solvent storage tanks are connected with vent condensers to prevent solvent vapours.	v. Noted and Work under process
21.	The industry shall not use odour causing substances such as Mercaptan or cause odour nuisance in the surroundings.	Noted and Taken all the necessary measures to control the odour nuisance.





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<b>Solid Waste:</b>		
The industry shall dispose solid waste (NON HAZARDOUS ) as follows:		
S.No	Name of the solid waste	Quantity
1.	Boiler Ash	9400 Kgs / Day
		Disposal
		To Brick Manufacturers
		Noted and Being Complied
<b>General:</b>		
23.	The industry shall evaluate the performance of solvent recovery system for each stream-wise and shall furnish plan of action to maintain the efficiency of solvent recovery more than 95% for each stream wise.	Noted and Being complied
24.	The industry shall dispose the spent solvents / mixed spent solvents to APPCB authorized recyclers / recovery within the premises.	Noted and Being complied
25.	The industry shall enter into an agreement with the cement industry for disposal of incinerable waste or shall dispose to Alternate Fuel Raw material facility (AFRF) OR TSDF for co-incineration.	Noted and Complied
26.	The industry shall transport the hazardous waste to cement industries through GPS vehicle.	Noted and Complied
27.	The industry shall not manufacture any product, other than those maintain in this order.	Noted and Being Complied



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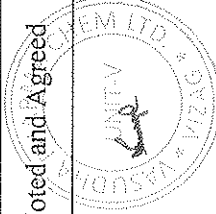
28.	The industry shall maintain the following records and the same shall be made available to the inspecting officers of the board.	Noted and Being Complied.														
	<table border="1"> <tr> <td data-bbox="438 1892 470 1937">a.</td> <td data-bbox="438 907 470 1892">Daily production details (ER-I Central Excise Returns).</td> </tr> <tr> <td data-bbox="470 1892 550 1937">b.</td> <td data-bbox="470 907 550 1892">Quantity of effluents generated, treated, recycled / reused and disposed to CETP.</td> </tr> <tr> <td data-bbox="550 1892 582 1937">c.</td> <td data-bbox="550 907 582 1892">Log books for pollution control systems</td> </tr> <tr> <td data-bbox="582 1892 614 1937">d.</td> <td data-bbox="582 907 614 1892">Characteristics of effluents and emissions.</td> </tr> <tr> <td data-bbox="614 1892 662 1937">e.</td> <td data-bbox="614 907 662 1892">Hazardous / non Hazardous solid waste generated and disposed.</td> </tr> <tr> <td data-bbox="662 1892 694 1937">f.</td> <td data-bbox="662 907 694 1892">Inspection book</td> </tr> <tr> <td data-bbox="694 1892 758 1937">g.</td> <td data-bbox="694 907 758 1892">Manifest copies of effluents / hazardous waste.</td> </tr> </table>	a.	Daily production details (ER-I Central Excise Returns).	b.	Quantity of effluents generated, treated, recycled / reused and disposed to CETP.	c.	Log books for pollution control systems	d.	Characteristics of effluents and emissions.	e.	Hazardous / non Hazardous solid waste generated and disposed.	f.	Inspection book	g.	Manifest copies of effluents / hazardous waste.	Noted and Being Complied.
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f.	Inspection book															
g.	Manifest copies of effluents / hazardous waste.															
29.	The industry shall submit AAQ monitoring reports conducted by Authorized Agency every month.	Noted and Being Complied.														
30.	The industry shall green belt in the remaining area of 4898 Sq. M so as to achieve 22% greenery by end of June -2019.	Noted and Agreed At present we completed 11%. Remaining we'll develop phase wise. So please take into consideration.														
31.	Any other directions / circulars / notices issued by CPCB, MoEF & CC and APPCB shall be followed from time to time.	Noted and Agreed														

**SCHEDULE – C**

**[See rule 6(2)]**

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

1	The authorized person shall comply of 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, shell, transfer or otherwise transport the hazardous and other waste except what is permitted through this authorization.	Noted and Agreed



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4	Any unauthorised change in personnel, equipment or working conditions as mentioned in the application by the person authorised shall constitute a breach of his authorisation.	Noted and Agreed
5	The person authorised shall implement Emergency Response Procedure (ERP) for which this authorisation is being granted considering all site specific possible scenarios such as spillages, leakages, fire etc. and their possible impacts and also carry out mock drill in this regard at regular interval of time	Compiled and we are attaching a copy of mock drill conducted recently as an annexure.
6	The person authorised shall comply with the provisions outlined in the Central Pollution Control Board guidelines on "Implementing Liabilities for Environmental File No.APCB-11022/32/2019-TEC-CFO-APPCB Damages due to Handling and Disposal of Hazardous Waste and Penalty".	Noted and Agreed
7	It is the duty of the authorised person to take prior permission of the State Pollution Control Board to close down the facility.	Noted and Agreed
8	The imported hazardous and other wastes shall be fully insured for transit as well as for any accidental occurrence and its clean-up operation.	Noted and Agreed
9	The record of consumption and fate of the imported hazardous and other wastes shall be maintained.	Noted and Agreed
10	The hazardous and other waste which gets generated during recycling or reuse or recovery or pre-processing or utilisation of imported hazardous or other wastes shall be treated and disposed of as per specific conditions of authorisation.	Noted and Agreed
11	An application for the renewal of an authorisation shall be made as laid down under these Rules.	Noted and Agreed
12	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 Agreed
13	Annual return shall be filed by June 30th for the period ensuring 31st March of the year.	Noted and Being Complied
14	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



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15	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 Agreed
16	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 Being complied. At present as per APPCB instructions we sending our wastes through online manifest system. Manifest copies are submitting to the concerned Regional office, APPCB.
17	The industry shall maintain proper records for Hazardous and Other Wastes stated in Authorisation in Form-3 i.e., quantity of Incinerable waste, land disposal waste, recyclable waste etc., and file annual returns in Form-4 as per Rule 20 (2) of the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016.	Noted and Being complied





VASUDEHA PHARMA CHEM LIMITED  
UNIT-V

## MOCK DRILL REPORT

Date of Mock Drill : 19.06.2020

Area of Mock Drill : Production Block-III

Nature of Emergency : Toxic Gas Release (Ammonia)

Incident observed by : K.Thowdu Babu

Time of observance : 15:12

Time of information given to Incident Controller: 15:12

Time of emergency declaration : 15:13

Time of emergency call given : 15:14

Functioning of Mega Phone : OK

Time of arrival by Incident Main Controller / SMC: 15:17

Name of the Incident Main Controller : CH.Subramanyam

Time of arrival by First Aid team : 15:15

Names of First Aid team members : a. M.Govind  
b. S.Sivayya

Time of arrival by Fire fighters : NA

Names of Fire Fighters : NA

Time of arrival by Rescue team members: 15:12

Names of Rescue team members : K.Thowdu Babu

Names of Evacuation Team members : a. D.Somasekhar  
b. S.Thirapathayya

Other key personnel arrival time: Name: D.Srinivasa Varma Time: 15:15  
Name: D.Vamsi Time: 15:16  
Name: CH.Subramanyam Time: 15:17

In case of Fire : NO

No. of Fire Extinguishers brought : NA



VASUDHA PHARMA CHEM LIMITED  
UNIT-V

## MOCK DRILL REPORT

No. of Fire Hydrant posts operated : NA  
No. of Foam monitors operated : NA  
Whether evacuation declared : 15:18  
Head count taken by : D.Vamsi  
Whether any person missing : No  
Whether Search party deputed & names: NA  
Time of finding of missed person : NA  
Whether any person injured : Srinivas  
Is First Aid given to injured person : Yes  
Time of arrival of Ambulance : 15:15  
Time of sending injured persons to the hospital : 15:16  
Time of Emergency controlled : 15:28  
Emergency call off (All Clear) siren given time : 15:29  
How much time taken to the total scenario : 17 Minutes

Remarks by observers: 1. SCBA not wearing properly  
2. Vehicles movement observed

### OBSERVERS:

1. Name: R. Viswanatha Reddy

Designation: Manager

Signature: R. Viswanatha Reddy  
19/06/2020

2. Name: Ch. Gopi

Designation: Manager

Signature: Ch. Gopi 19/06/2020

MOCK DRILL OBSERVATION CHECKLIST

(ASSEMBLY POINT)

Incident description : TOXIC gas release [ Ammonia gas ]  
Date & Time of mock drill : 19/06/2020 15:12 hr  
Name of observer : CH Gopi  
Department / Company of observer : production

S.No.	Evaluation Points	Remarks
1	Time of Siren	15:12 hr
2	Time of start to employees arrival to assembly point	15:13 hr
3	Did employees reached assembly point in orderly manner	✓
4	Did contractor employees report at assembly point	✓
5	Time of Completion of head count of employees	15:18 hr
6	No. of persons (including contract workers) attended for duty	62
	No. of persons reached assembly point	58
	No. of persons not reached the assembly point	2
	Time of completion of total head count	15:30 hr
7	Was there any commotion/problem	- No -
8	Time of siren for all clear	15:31 hr
9	Time of leaving the assembly point	15:32 hr
10	Overall performance Good/Average/Bad	Good
Comments of Observer: ① Ambulance reached Right time ② Employees reach assembly point slowly.		

CH Gopi 19/06/2020  
Signature of Observer



MOCK DRILL OBSERVATION CHECKLIST

(SITE OF INCIDENT)

Incident description : Toxic gas release at SSR-302  
 Date & Time of mock drill : 19/06/2020 15:09  
 Name of observer : R. Viswanadha Raddy  
 Department / Company of observer : production

S.No.	Evaluation Points	Remarks
1	Time of Siren	15:13
2	Name of Site controller	Subrahmanyam
3	Time of arrival of site controller	15:17:51
4	Time of arrival of Emergency Response Team (ERT)	15:22:20
5	Did site controller give instruction to bring all operations in the department to safe level	Yes
6	Did site controller given instruction for plant shut down	Yes
7	Did site controller send emergency response team for rescue/search of missing people	-
8	Time of EHS Manager/In-charge arrival	15:15:21
9	Time of completion of emergency	15:28
10	Time of all clear siren	15:29
11	Overall performance Good/Average/Bad	Good

Comments of Observer: 1) SCBA not practically used.  
 2) Telephone not working at the time of site controller giving calls to others.  
 3) vehicle movement observed on stands  
 4) Segregation but head count is good.  
 5) Head count at assembly point (Accuracy stands overall good).

R. Viswanadha Raddy  
 19/06/2020

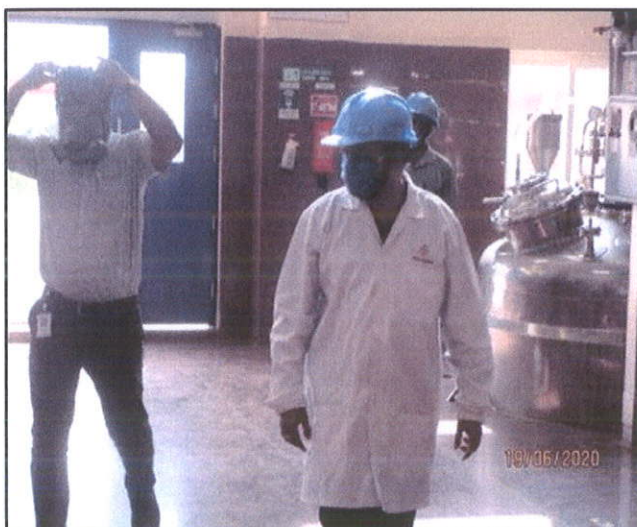
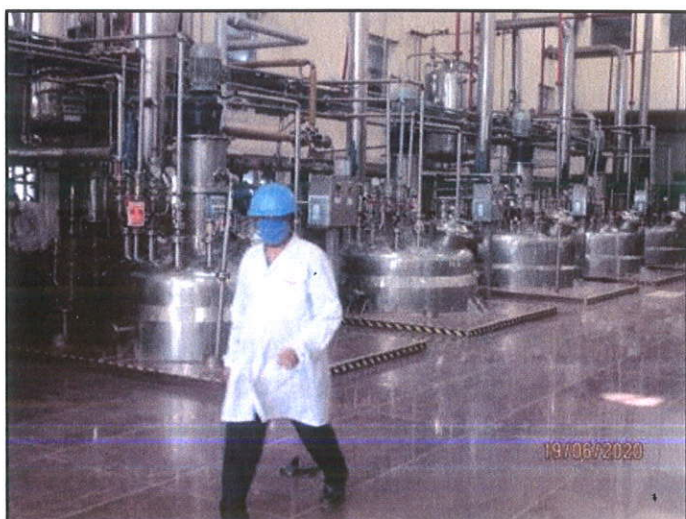
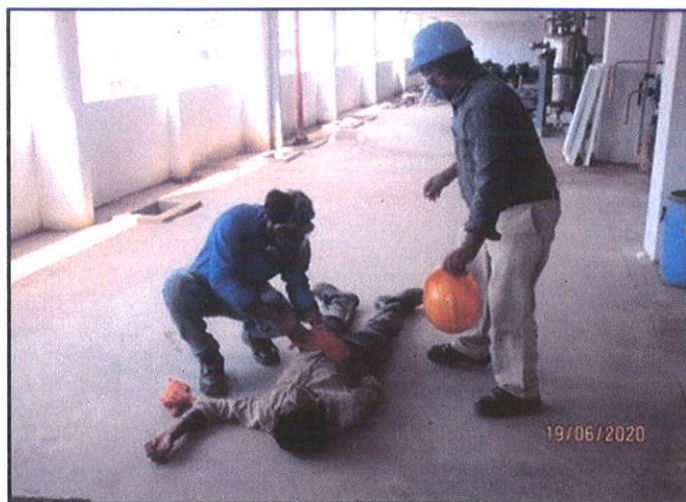
Signature of Observer





VASUDHA PHARMA CHEM LIMITED, UNIT-V

MOCK DRILL / EXERCISE REPORT





# VASUDHA PHARMA CHEM LIMITED, UNIT-V

## MOCK DRILL / EXERCISE REPORT

