

ANDHRA PRADESH POLLUTION CONTROL BOARD

D. No. 33-26-14 D/2, Near Sunrise Hospital, Pushpa Hotel Centre, Chalamalavari Street, Kasturibaipet, Vijayawada - 520 010 Website: www.pcb.ap.gov.in

CONSENT ORDER FOR ESTABLISHMENT

Order No.135/APPCB/CFE/RO-VSP/HO/2018

20/03/2020

Sub:APPCB - CFE - M/s. Torrent Pharmaceuticals Ltd., (Formerly M/s. Glochem Industries Ltd.,) Plot No.77, JN Pharmacity, Thanam (V), Parawada (M), Visakhapatnam - Consent for Establishment of the Board for Change of Product Mix under Sec. 25 of Water (P & C of P) Act, 1974 and Under Sec. 21 of Air (P&C of P) Act, 1981 - Issued - Reg.

Ref:

- 1. CFE (CPM) order dt.26.04.2018.
- 2. Industry's application received through A.P. OCMMS on 20.02.2020
- 3. R.O's inspection report dt.13.03.2020.
- 4. CFE Committee meeting held on 17.03.2020.
- 5. Industry's Ir. dt. 17.03.2020.

In the reference 2nd cited, an application was submitted to the Board seeking Consent for 1. Establishment (CFE) **Change of Product Mix** to produce the products with installed capacities as mentioned below, with increase in project cost of Rs.23.76 crores.

As per CFE order dt. 26.04.2018:

S. No.	Name of product	Quantity Kg/day
1	Esomeprazolemagnesium amorphous (or) Esomeprazolemagnesiumdihydrate	16.44
2	TRC 150094	19.73
3	Duloxetine HCL	16.44
4	TRC041266	19.99
5	Febuxostat API	9.86
6	TRC 160334	9.86
7	Esomeprazole Intermediate (Stage-III)	96.99
8	TRC 240138	2.99
9	Rivastigmine hydrogen tartarate	8.22
10	Candesartan Cilexetine	23.01
11	Olanzapine	9.99
12	Sildenafil Citrate	19.73
	Silodosin	5.00
14	OlmesartanMedoxomil	9.99
15	Pramipexole	2.01
	Lamotrigine	82.19
	RasagilineFumarate	2.99
	Sitagliptin Tartrate	9.99
19	Rabeprazole Sodium	16.44
20	Venlafaxine Hydrochloride	45.01

21	Perampanel	5.00
22	Lercanidipine	16.44
23	QuetiapineFumarate	9.99
24	Topiramate	9.99
25	Famotidine	32.88
26	Donepezile HCL	9.99
27	Nircorandil	13.15
	Alfuzosin Hydrochloride	2.01
	Raloxifine Hydrochloride	3.29
30	Vilazodone Hydrochloride	9.99
	Olanzapine Pamoate	2.99
	Sacubitril-valsartan	2.99
	Safinamdie	2.99
34	Roflumilast	0.99
	Sertraline HCL	9.86
	Ferric citrate Hydrate	14.99
	Telmisartan	2.99
	ClopidogrelBisulphate form-II	2.99
	Apixaban	2.99
	Levodopa	5.00
	TRC04186	5.00
	Prucalopride Succinate	5.00
	ClopidogrelBisulphate form-l	2.99
	Teneligliptinhemipentahydro bromide hydrate	2.99
	DarifenacinHydrobromide	0.99
	TapentadolHemipamoate	0.99
	AripiprazoleLauroxil	0.99
	Paliperidone	2.99
	Ormeloxifene HCL	5.00
	EsomeprazolemagnesiumTrihydrate	5.00
	LEVOCETIRIZINE DIHYDROCHLORIDE*	8.33
52	Validation batches/research and development	10.00
	Total	630.32

The industry shall manufacture either Levocetirizine Dihydrochloride (or) Clopidogrel BiSulphate form-II + Levodopa + Clopidogrel Bisulphate form-1 at any point of time, along with other products.

After Change of Product Mix:

S. N o	Name of product	Qty Kg/da y	No. of stag es	Starting key Raw material	Quanti ty Kg/day
1	ESOMEPRAZOLEMAGN ESIUM AMORPHOUS or ESOMEPRAZOLE MAGNESIUM TRIHYDRATE	16.44	5	2Chloromethyl 3 5Dimethyl4Methoxy Pyridine Hydrochloride	55.85
2	TRC 150094	19.73	7	5Methylindan4ol*	34.06
3	DULOXETINE HCL	16.44	3	SNNdimethyl3hydroxy32thienyl1propana mine	15.28
4	TRC041266	19.99	3	MSNH	44.43
5	Febuxostat API	2.74	3	Ethyl 23formyl4hydroxy phenyl4methyl13thiazole5carboxylate KSM	4.89
6	TRC 160334	1.37	2	TRC160334 stageII*	5.53
	ESOMEPRAZOLE INTERMEDIATE STAGEIII	60	3	2Chloromethyl35Dimethyl4Methoxy Pyridine Hydrochloride	47.42
8	TRC 240138	1.37	12	TRC240138 INT BAPI	1.96
9	RIVASTIGMINE HYDROGEN TARTARATE	5.48	5	31dimethyl amine ethyl Phenol HCL	10.59
10	CANDESARTAN CILEXETINE	16.44	5	3Nitro thalic acid KSM	28.08
11	OLANZAPINE	9.99	5	2Amino5Methylthiophene3Carbonitrile	29.78
12	SILDENAFIL CITRATE	19.73	4	4[2Ethoxy benzamido]1Methyl3NPropyl prazole52Caboximade	112.68
	Silodosin	5.00	4	3{5[2R2aminopropyl]7cyano23dihydro1Hi ndol1yl}propyl benzoate 2R3Rmonotartarate KSMI	15.48
14	OLMESARTAN MEDOXOMIL	24.66	3	41hydroxy1methylethyl2propylHimidazol e5carboxylic acid ethyl ester	1.19
15	PRAMIPEXOLE	2.01	4	± 26Diamino4567tetrahydrobenzothiazole	10.97
16	LAMOTRIGINE	68.49	2	23 DichloroBenzoylChloride	120.87
17	RASAGILINE FUMARATE	2.99	3	1Amino indane	18.75
	Sitagliptin Tartrate	1.37	2	3R3[tertButoxycarbonylamino]4245trifluor ophenylbutanoic acid KSM1	1.37
	RABEPRAZOLE SODIUM	10.96	3	2Chloromethoxyl43Methoxy Propoxy3Methyl pyridine Hydrochloride	15.54
20	VENLAFAXINE HYDROCHLORIDE	45.01	2	1[2Amino14methoxy phenylethyl] CyclohexanolHydrochlorideKSM	51.37

21	Perampanel	5.00	2	± 26 diamino	10.97
				2NDimethylN33diphenylpropyl1amino2propanol	18.67
	LERCANIDIPINE	10.96	2	26Diemthyl5methoxy carbonyl43nitrophenyl14dihydro pyridine3carboxylic acid	18.67
23	QUETIAPINE FUMARATE	9.99	2	RMQ1	9.05
24	TOPIRAMATE	9.99	2	DFructose	12.95
25	Famotidine	5.48	2	N[4[[Aminoiminomethylthio]methyl]2thiaz olyl]guanidine dihydrochloride	8.58
26	DONEPEZILE HCI	9.99	3	56dimethoxy 1indanone	0.90
27	NIRCORANDIL	13.15	3	Nicotinic Acid	32.51
1	ALFUZOSIN HYDROCHLORIDE	2.01	3	4amino2chloro67dimethoxy quinazoline	1.99
29	RALOXIFINE HYDROCHLORIDE	3.29	6	3Methoxy thiophenolThiol	10.26
30	Vilazodone Hydrochloride	9.99	2	5piperazin1yl benzofuran2carboxamide KSMI	9.93
31	OLANZAPINE PAMOATE	2.99	1	Olanzapine IP	1.34
32	SacubitrilValsartan	2.99	3	NR4tbutoxycarbonylpphenylphenylalanin e carboxaldehyde KSMI	8.96
33	Safinamide	2.99	3	4Hydroxy benzaldehyde KSMI	2.76
34	Roflumilast	0.99	2	3Cyclopropylmethoxy4difluoro methoxy benzoic acid KSMI	1.08
35	SERTRALINE HCL	2.74	4	Tetralone	14.20
36	Ferric Citrate Hydrate	5.48	2	Ferric chloride hexahydrate KSM1	6.84
-	Telmisartan	2.99	2	Methyl4nButryl Amino 3— Methyl5NitroBenzoate	3.73
38	CLOPIDOGREL BISULPHATE FORMII	2.99	60	Thiophene2Ethyl amine	5.42
39	Apixaban	5.00	3	3Morpholin4yl1[42oxopiperidin1ylphenyl] 56dihyro1Hpyridin2one	4.50
40	LEVODOPA	5.00	3	S2Amino334 Dihydryphnylpropanoic acid	5.00
41	TRC04186	5.00	2	MSNH	4.98
42	Prucalopride Succinate	2.99	3	4amino5chloro23dihydro1benzofuran7ca rboxylic acid KSMI	4.14
43	CLOPIDOGREL BISULPHATE FORMI	2.99	2	Thiophene2Ethyl amine	10.65
44	Teneligliptinhemipentahy dro bromide hydrate	0.99	2	13Methyl1phenyl1Hpyrazol5yl piperazine	1.64
	DARIFENACIN HYDROBROMIDE	0.14	2	23dihydro1benzofuran5yl acetic acid	0.80
46	TAPENTADOL HEMIPAMOATE	0.99	1	Tapentadol Hydrochloride	0.15
47	AripiprazoleLauroxil	2.99	2	Aripiprazole or 7{4[423Dichlorophenylpiperazin1yl]butox y}34dihydroquinolin21Hone	1.12
48	PALIPERIDONE	5.00	4	3Benzyloxy2amino pyridine	5.95

49	ORMELOXIFENE HCI	3.00	1	Intermediate of OrmeloxifeneHClStV	5.80
50	ESOMEPRAZOLEMAGN ESIUM TRIHYDRATE	9.86		2Chloromethyl35Dimethyl4Methoxy Pyridine Hydrochloride	8.58
51	Validation batches/Research and development	13.15	1		-
52	Montelukast Sodium	19.73		2[2[3S[3[27Chloro2quinolinylethenyl] phenyl]3hydroxypropyl] phenyl2propanol	21.92
	ZolpidemHemitartrate	27.40	3	6methyl24methylphenylimidazo[12a]pyrid in3yl]acetonitrile. Zolpidem KSMI	25.67
54	Pantoprazole sodium sesquihydrate	54.25	1	5Difluoromethoxy1Hbenzimidazole2thiol	37.66
55	Rosuvastatin Calcium	16.44	2	Advance Intermediate	29.98
56	Ropinirole	0.27		42bromoethyl3chloro 13dihydro2Hindole2one	1.05
57	LevocetrizineHCl	1.37	3	Piperazine Condensate	1.19
58	Pencyclovir	0.2739 72	5	2amino6chloro purine	34.20
		630.32			
	Total	Kg/da y			

The industry shall manufacture any 58 products at any given point of time with a maximum production capacity of 630.32 Kg/day.

- 2. As per the application, the above activity is to be located within the existing industry premises located at Plot No.77, JNPC, Thanam (V), Parawada, Visakhapatnam in an area of 5.23 acres.
- 3. The industry was inspected by the Asst. Environmental Engineer I, Regional Office, Visakhapatnam, A.P Pollution Control Board on 13.03.2020 and observed that the site is surrounded by

North: M/s. Suven Life Sciences

South : Internal road followed by M/s. Mahidhara Chemicals

East : KRR Drugs

West : Internal road followed by Vacant plots

- 4. The Board, after careful scrutiny of the application and verification report of the Regional Officer, hereby issues CONSENT FOR ESTABLISHMENT FOR CHANGE OF PRODUCT MIX to the project under Section 25 of Water (Prevention & Control of Pollution) Act 1974 and Section 21 of Air (Prevention & Control of Pollution) Act, 1981 and the rules made there under. This order is issued to manufacture the products as mentioned at para (1) only.
- 5. This Consent Order now issued is subject to the conditions mentioned in the Annexure.
- 6. This order is issued from pollution control point of view only. Zoning and other regulations are not considered.

7. This order is valid for a period of 7 years from the date of issue.

Encl: Annexure.

VIVEK YADAV IAS, MS(VY), O/o MEMBER SECRETARY-APPCB MEMBER SECRETARY

To M/s. Torrent Pharmaceuticals Ltd., (Formerly M/s. Glochem Industries Ltd.,) Plot No: 77, JN Pharmacity, Thanam (V), Parawada (M), Visakhapatnam manishparikh@torrentpharma.com sheshagiriraotirlangi@torrentpharma.com

Copy to: 1. The JCEE, Z.O: Visakhapatnam for information and necessary action.

2. The E.E., R.O: Visakhapatnam for information and necessary action.

Annexure

- 1. The proponent shall obtain Consent for Operation (CFO) from APPCB, as required Under Sec.25/26 of the Water (P&C of P) Act, 1974 and under sec. 21/22 of the Air (P&C of P) Act, 1981, before commencement of the trail runs.
- 2. The applicant shall provide separate energy meters for Effluent Treatment Plant (ETP) and Air pollution Control equipments to record energy consumed. An alternative electric power source sufficient to operate all pollution control systems shall be provided.
- 3. The industry shall construct separate storm water drains. No effluents shall be discharged in to the storm water drains.

Water:

4. The source of water is JNPC and the maximum permitted water consumption is as following:

S. No.	Purpose	Qty as per CFE order dt.26.04.2018 (KLD)	Qty after Change of Product Mix (KLD)
1.	Industrial cooling	32.28	16.00
2.	Boiler feed		16.28
3.	Domestic	31.84	16.22
4.	Gardening		15.62
5.	Process and wash, DM plant.	101.64	85.22
6.	Scrubber system		0.94
7.	Periodical equipment cleaning		1.86
8.	Detoxification of containers		13.46
9.	Floor washings		0.16
	Total	165.76	165.76

Separate meters with necessary pipe-line shall be provided for assessing the quantity of water used for each of the purposes mentioned above.

5. The maximum waste water generation shall not exceed the following:

S. No	Purpose	Quantity as per CFE (CPM) order dated 26.04.2018 (KLD)			Proposed after CPM (KLD)		
		HTDS	LTDS	Total	HTDS	LTDS	Total
1.	Process & Washings	25.05	27.015	52.065	25.05	27.015	52.065
2.	Boiler Blow down	0.20	14.88	15.08	0.20	14.88	15.08
3.	Cooling towers Blow Down	0.00	10.00	10.00	0.00	10.00	10.00

4.	Scrubber System	0.90	0.00	0.90	0.90	0.00	0.90
5.	Domestic	0.00	13.07	13.07	0.00	13.07	13.07
6.	Floor washings	0.00	0.16	0.16	0.00	0.16	0.16
7.	Periodical Equipment cleaning	0.00	1.86	1.86	0.00	1.86	1.86
8.	Detoxification of containers	0.00	11.47	11.47	0.00	11.47	11.47
Total		26.15	78.455	104.605	26.15	78.455	104.605

Treatment & disposal:

Source	Treatment	Mode of final disposal		
HTDS	Pretreatment (Neutralization)	To M/s. Ramky Pharmacity for forced evaporation.		
LTDS		To CETP of M/s. Ramky Pharmacity for further treatment and disposal		
Domestic waste water		The overflow of the Septic tank shall be sent to the CETP for further treatment.		

- 6. Effluents shall not be discharged on land or into any water bodies or aquifers under any circumstances.
- 7. The industry shall properly operate and maintain online real time monitoring system along with web camera facilities and shall ensure that it is connected to APPCB / CPCB websites as per CPCB directions.
- 8. Floor washing shall be admitted into the effluent collection system only and shall not be allowed to find their way in storm drains or open areas. All pipe valves, sewers, drains shall be leak proof.

Air:

9. The Air pollution Control equipment shall be maintained properly to comply with the following for controlling air pollution after Change of Product Mix:

S. No	Details of Stack	Stack 1	Stack 2	Stack 3
a)	Attached to:	Boiler	Thermic Fluid Heater	D.G. Set
b)	Capacity	2.0 TPH	2 Lakh. Kilo calories	2 X 380 KVA (1 standby)
c)	Fuel:	Coal / Briquette		Diesel
d)	Stack height:	30 m		10 m
e)	Control Equipment:	Cyclone & Bag filter		Acoustic enclosures

10. A sampling port with removable dummy of not less than 15 cm diameter shall be provided in the stack at a distance of 8 times the diameter of the stack from the nearest constraint such as bends etc. A platform with suitable ladder shall be provided below 1 meter of sampling port to accommodate three persons with instruments. A 15 AMP 250 V plug point shall be provided on the platform.

- 11. The industry shall properly operate and maintain the monitoring system to all the stacks / vents in the plant. Regular monitoring shall be carried out and report shall be submitted to the Regional officer.
- 12. The industry shall properly operate and maintain multi-stage scrubbers to the process vents to control the process emissions. The industry shall ensure that online pH measuring facility with auto recording system is connected to the scrubbers.
- 13. The industry shall properly operate and maintain VOC monitoring system with auto recording facility.
- 14. The industry shall implement adequate measures to control all fugitive emissions from the plant.
- 15. The proponent shall ensure compliance of the National Ambient Air quality standards notified by MoEF, Gol vide notification No. GSR. 826 (E), dated. 16.11.2009 during construction and regular operational phase of the project at the periphery.
 - The generator shall be installed in a closed area with a silencer and suitable noise absorption systems. The ambient noise level shall not exceed 75 dB(A) during day time and 70 dB(A) during night time.
- 16. The proponent shall not use or generate odour causing substances or Mercaptans and cause odour nuisance in the surroundings.
- 17. The industry shall send the used / spent solvents to the recyclers (or) process them at their own solvent recovery facility within the premises.
- 18. The evaporation losses in solvents shall be controlled by taking the following measures:
 - i. Chilled brine circulation shall be carried out to effectively reduce the solvent losses into the atmosphere.
 - ii. Transfer of solvents shall be done by using pumps instead of manual handling.
 - iii. Closed centrifuges shall be used to reduce solvent losses.
 - iv. All the solvent storage tanks shall be connected with vent condensers to prevent solvent vapours.
 - v. The reactor vents shall be connected with primary & secondary condensers to prevent escaping of solvent vapour emissions into atmosphere.

Solid / Hazardous Waste:

19. The industry shall comply with the following for disposal of Solid waste/ Hazardous waste:

S. No.	Description	Quantity As per CFE (CPM) order dated 26.04.2018	After Change of Product Mix	Mode of Disposal
1.	Process residue and Organic residue from Distillation bottom	641.65 TPA	641.65 TPA	Sent to TSDF, Parawada, for incineration/ Authorised Cement plants for co-
2.	Spent Carbon + Hyflow	62.18 TPA	57.77 TPA	processing.
3.	Inorganic process salts	241.19 TPA	241.19 TPA	Sent to TSDF, Parawada, for
4.	ETP Sludge	25.0 TPA	25.0 TPA	secured land filling.
5.	Spent solvents	9803.87 Kg/day	9803.87 Kg/day	Shall be sent to APPCB authorized agency
6.	Used Oils	5000 LPA	5000 LPA	Authorized reprocessors/recyclers
7.	Container and container liners of hazardous waste	20,000 nos. per Annum	20,000 nos. per Annum	After complete detoxification shall be disposed to outside agencies for recycling.
8.	Used lead acid batteries	150 nos. per Annum		Shall be sent back to suppliers on buy back basis.
9.	Mixed solvent	4977.6 Kg/day	4977.6 Kg/day	Shall be sent to APPCB authorized agency
10.	Spent acids	2739.8 Kg/day	2739.8 Kg/day	Shall be sent to APPCB authorized agency
11.	Contaminated Sand (used for spill collection & control)	2.0 TPA	2.0 TPA	Sent to TSDF, Parawada, for secured land filling.
12.	Rejected raw material	Actuals	Actuals	
13.	Rejected Products	Actuals	Actuals	
14.	Hepa Filters	3.0 TPA	3.0 TPA	Sent to TSDF, Parawada, for incineration
15.	Insulation wool	0.99 TPA	0.99 TPA	
16.	Thermocol	0.50 TPA	0.50 TPA	
17.	Contaminated glassware	20,000 nos. per Annum	20,000 nos. per Annum	After complete detoxification shall be disposed to outside agencies.
18.	PPEs	3.50 TPA	3.50 TPA	Sent to TSDF, Parawada, for incineration.
19.	Sodium Hydride bags	0.50 TPA	0.50 TPA	Sent to TSDF, Parawada, for incineration.

20.	HDPE Bags	8.78 TPA	8.78 TPA	Sent to TSDF, Parawada, for incineration / for recycling to authorized recyclers.
21.	Expired Laboratory chemicals	1.0 TPA	1.0 TPA	Sent to TSDF, Parawada, for incineration.
	Filtration bags	500 nos. per Annum		Sent to TSDF, Parawada, for incineration.
23.	Coal Ash	251 TPA	251 TPA	Disposed to local Ash Bricks manufacturers.
24.	Cooling Tower Sludge	10 TPA		Sent to TSDF/CWMP, Parawada, Visakhapatnam District for incineration.
25.	Cooling Tower Packing material	2.0 TPA		Sent to TSDF/CWMP, Parawada, Visakhapatnam District for incineration.
26.	Foam	1.0 TPA		Sent to TSDF/CWMP, Parawada, Visakhapatnam District for incineration.
27.	Discarded Samples (Products and raw materials)	2.0 TPA	2.0 TPA	Sent to TSDF/CWMP, Parawada, Visakhapatnam District for incineration.
28.	Oil Contaminated Waste(DG Set oil filters)	1.0 TPA	1.0 TPA	Sent to TSDF/CWMP, Parawada, Visakhapatnam District for incineration.
29.	General Waste	25.0 TPA	25.0 TPA	Sent to TSDF/CWMP, Parawada, Visakhapatnam District for incineration.

- 20. The proponent shall provide shed for storage of coal and boiler ash.
- 21. The proponent shall place the chemical drums and / or any drums in a shed provided with concrete platform only. The Platform shall be provided with sufficient dyke wall and effluent collection system. The industry shall provide containers detoxification facility. 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.
- 22. The following rules and regulations notified by the MoEF&CC, Gol shall be implemented.
 - a) Regulation of Persistent Organic Pollutants Rules, 2018.
 - b) Hazardous waste and other wastes (Management and Transboundary Movement) Rules, 2016.
 - c) Plastic Waste Management Rules, 2016.
 - d) Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989
 - e) Fly Ash Notification, 2016.
 - f) Batteries (Management & Handling) Rules, 2010.
 - g) E-Waste (Management) Rules, 2016.
 - h) Construction and Demolition waste Management Rules, 2016.
 - i) Solid Waste Management Rules, 2016.
 - j) The Public Liability Insurance Act, 1991 and its amendments thereof.

Other Conditions:

- 23. The industry shall comply with the directions of Revocation of closure order dt.31.03.2015 issued by the Task Force. The industry shall represent to Member Secretary (i.e. UH-2) regarding return of BG of Rs.5.0 Lakhs.
- 24. Existing green belt shall not be disturbed due to the proposed Change of Product Mix. Thick green belt shall be maintained all along the boundary & vacant spaces with tall growing trees with good canopy and it shall not be less than 33% of the total area. Plantation shall be completed along the periphery, internal roads etc., by the end of July, 2020 as informed in the CFE Committee meeting.
- 25. The industry shall submit the information regarding usage of Ozone Depleting Substance once in six months to the Regional Office and Zonal Office of the Board.
- 26. Concealing the factual data or submission of false information / fabricated data and failure to comply with any of the conditions mentioned in this order attracts action under the provisions of relevant pollution control Acts.
- 27. Notwithstanding anything contained in this conditional letter or consent, the Board hereby reserves its right and power Under Sec. 27(2) of Water (Prevention and Control of Pollution) Act, 1974 and Under Sec.21(4) of Air (Prevention and Control of Pollution) Act, 1981 to revoke the order, to review any or all the conditions imposed herein and to make such modifications as deemed fit and stipulate any additional conditions.
- 28. 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 such authority (hereinafter referred to as the Appellate Authority) constituted under Section 28 of Water (Prevention and Control of Pollution)Act, 1974 and Section 31 of the Air (Prevention and Control of Pollution) Act, 1981.

VIVEK YADAV IAS, MS(VY), O/o MEMBER SECRETARY-APPCB MEMBER SECRETARY

To

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