

20th June 2023,
Visakhapatnam.

To,
The Environmental Engineer,
AP Pollution Control Board,
Regional Office,
Visakhapatnam.

Subject: Submission of 6 months' CFO compliance reports for the month of June-2023

Respected Sir,

We are here with submitting the 6 months CFO compliance report for the month of June-2023.
Kindly acknowledge the receipt of the same.

Thanking you,
Yours Truly,

For Torrent Pharmaceuticals Limited


20/06/2023

N Rajyalakshmi
(Manager-HSE)



21-6-23

**HALF-YEARLY COMPLIANCE TO THE CONDITIONS STIPULATED
IN CTO ISSUED BY APPCB/RO-VSP**

**VIDE ORDER NO: APPCB/VSP/135/HO/CTO/2021, Dated -
24/01/2023,**

Submitted By

**M/s. TORRENT PHARMACEUTICALS
LTD PLOT NO: 77, J.N. PHARMA CITY,
PARAWADA MANDAL, THANAM
VILLAGE, VISAKHAPATNAM - 531
021.**

Period: Jan, 2023 to June, 2023

COMPLIANCE REPORT

Prepared By

**M/s. TORRENT PHARMACEUTICALS LTD
PLOT NO: 77, J.N PHARMA CITY,
PARAWADA MANDAL, THANAM VILLAGE,
VISAKHAPATNAM**

COMPLIANCE TO THE CONDITIONS OF CFO

S. No	CFO Conditions	Compliance
Schedule-A		
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.	Condition noted any up-set condition in plant / activity of the industry, which result in, increased effluent / emission discharge and / or violation of standards stipulated in this order same will inform the board and take immediate action to bring down the discharge / emission below the limits.
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.	Yes, Analysis being carried out by external authorized agency for wastewater discharges and emissions through chimneys and duly submitted to the board. Complied.
3	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.	Condition noted and the same was accepted.
4	The industry shall ensure that there shall not be any change in the process technology, source & composition of raw materials and scope of working without prior approval from the Board.	Condition noted and the same was accepted.
5	The applicant shall submit Environment statement in Form V before 30thSeptember every year as per Rule No.14 of E (P) Rules, 1986 & amendments thereof.	Submitted form-V (Environmental statement/ Audit report) before 30 th of September every year. Complied
6	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.	Condition noted and accepted.

7	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.	Condition noted and accepted. Revised application for consent will be submitted if there any changes.
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	We are complying all rules and regulations of the Board.
9	The industry shall be liable to pay Environmental Compensation / Other Environmental Taxes, if any environmental damage caused to the surroundings, as fixed by the Collector & District Magistrate or any other competent authority as per the Rules in vogue	Condition noted and the same was accepted.
10	The industry may explore the possibility of tapping the solar energy for their energy requirements	Noted. WE are in the process of exploring the possibility of utilizing the solar energy for their energy requirements.
11	The industry should educate the workers and nearby public of possible accidents and remedial measures.	Condition noted and same was followed.
Schedule -B		
1	The industry shall comply with the SOP of CPCB and maintain vent of the condenser shall be passed through VOC absorption Media like Activated Carbon.	Vent of the condenser is passed through VOC absorption Media (Activated Carbon) Complied.
2	The industry shall connect online pH meters connected to the scrubbers & VOC meter to APPCB website within 1 month	We have connected the VOC meter with APPCB website and we connected the scrubber pH meters to APPCB.

3	The source of water is JNPC Supply. The following is the permitted water consumption:	Our Water consumption is within the permitted value. Complied.
4	The LTDS effluents sent to CETP, Pharmacity shall not contain constituents in excess of the tolerance limits mentioned below, as per their MOU with M/s. Ramky Pharma. City.	Our Effluent parameters are as per APPCB norms. Complied.
4(1)	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.	We have segregated the HTDS & LTDS Effluent and disposing the effluent based on Effluent Parameters. Complied.
5	The industry shall maintain Electro Magnetic flow meters with totalisers for water consumption, effluent generation mentioned in the Order	We have provided Electro Magnetic flow meters with totalisers for water consumption-19 Nos. Effluent generation -02 Nos. & effluent disposal -02 Nos. Complied.
6	The LTDS and HTDS effluents shall be stored in above ground collection tanks separately.	We are storing the LTDS and HTDS effluents in separate above ground collection tanks. Complied.
7	The industry shall maintain tank in tank for collection of effluent and washings from production blocks. Free space shall be maintained around the tank in tank to observe leakages if any	We have provided tank in tank for collection of effluent and washings from production blocks and Free space is being maintained around the tank in tank to observe leakages. Complied.
8	The industry shall maintain proper manifest system for effluent transported to CETP and maintain records for quantity of High TDS and Low TDS effluents sent to CETP of Pharmacity.	We are maintaining Online manifest system for effluent transported to CETP and maintaining records for quantity of High TDS and Low TDS effluents sent to CETP of Pharmacity. Complied.
9	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.	We are not discharging effluent on land or any water bodies or aquifers. Floor washings is directed into effluent collection system. Complied.
10	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	Containers detoxification facility available at Hazardous storage shed. Container & Container liners are being detoxified as per the detoxification SOP NO: VASF-028 at the specified covered platform with dyke walls & washed wastewater is being routed to low TDS

		collection tank. Complied.
11	The industry shall maintain web camera and flow meters provided for HTDS & LTDS pumped to CETP, JNPC, properly and same connected to CPCB & APPCB servers, as per CPCB directions dt. 05.02.2014 / 02.03.2015.	We are maintaining web camera and flow meters provided for HTDS & LTDS pumped to CETP and same connected to CPCB & APPCB servers as per CPCB directions. Complied.
12	Rain water shall not be allowed to mix with either trade or domestic effluents. Industry shall maintain storm water drains, properly	Rain water harvesting pit is provided. Complied.
Air Pollution		
13	The emissions shall not contain constituents in excess of the prescribed limits mentioned below:	Complied.
14	The industry shall comply with ambient air quality standards of PM10 (Particulate Matter size less than 10mm) - 100 mg/ m ³ ; PM2.5 (Particulate Matter size less than 2.5 mm) - 60 mg/ m ³ ; SO ₂ - 80 mg/ m ³ ; NO _x - 80 mg/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 6 AM to 10 PM) - 75 dB (A) Night time (10 PM to 6 AM) - 70 dB (A)	We are complying with ambient air quality standards. Complied.
15	The industry shall comply with emission limits for DG sets of capacity upto 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), 09.07.2002 at serial dated no.96, under the Environment (Protection) Act, 1986.	We are complying with emission limits for DG sets. Complied.
16	The industry shall provide a sampling port with removable dummy of not less than 15 cm diameter 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.	We have provided sampling port with removable dummy of not less than 15 cm diameter 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. Complied.
17	The industry shall operate the multi stage scrubbers for scrubbing of process emissions at all emission sources. The industry shall maintain online pH meters to the scrubbers. Scrubbed liquid shall be recycled as far as possible and finally sent to CETP of Pharmacity for further treatment.	We are operating the multi stage scrubbers for scrubbing of process emissions at all emission sources and maintaining online pH meters to the scrubbers. Scrubbed liquid is recycled and finally sent to CETP of Pharmacity. Complied.
18	The evaporation losses in solvents shall be controlled by taking the following measures: <ul style="list-style-type: none"> • 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 are 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. 	Complied.
19	The industry shall not use odour causing substances such as Merceptain or cause odour nuisance in the surroundings.	We are not using or generating odour causing substances such as Merceptain in our process operations. Will ensure the same in due course. Complied.
General		
20	The industry shall not manufacture new products and not exceed the consented capacity without CFE/CFO of the Board.	Noted and will follow the same
21	The effluent discharged and emissions shall comply with the tolerance limits mentioned in MoEF notification dated 09.07.2009 prescribed for Pharmaceutical (Manufacturing and Formulation) industry and G.S.R. 541(E) dt. 06.08.2021 for Bulk Drug and Formulation (Pharmaceutical).	Noted and will follow the same
22	The industry shall provide hood with scrubbers on the top of the effluent storage tanks to control odour nuisance at effluent	We have provided hood with scrubbers on the top of the effluent storage tanks to control odour nuisance. Complied.

	storage area.	
23	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.	We have dedicated Hazardous waste storage area for storing the hazardous waste/ drums containing chemicals / solvents. Complied.
24	The industry shall maintain the following records and the same shall be made available to the inspecting officers of the Board: <ul style="list-style-type: none"> • Daily production details. • Quantity of Effluents generated, treated, recycled / reused and disposed to CETP. • Log Books for pollution control systems. • Characteristics of effluents and emissions. • Hazardous/non-hazardous solid waste generated and disposed. • Inspection book. • Manifest copies of effluents / hazardous waste. 	Complied.
25	The industry shall maintain records on source of intermediates for each product-wise along with invoice copies of the intermediates outsourced	Noted and will follow the same
26	The industry shall comply with the SOP issued by CPCB for Solvent Recovery units dated 22.03.2021. The total cumulative losses of solvents shall not be more than 5% of the solvent on annual basis from storage inventory.	Noted and will follow the same
27	The industry shall comply with SOP's issued by CPCB time to time for all the wastes.	Noted and will follow the same
28	The industry shall maintain valid PLI policy which includes Environmental Relief Fund (ERF) and submit copy to RO, Visakhapatnam on yearly base.	We have Valid PLI policy up to 30.09.2023. Complied.
29	The industry shall comply with the Regulation of Persistent Organic Pollutants Rules, 2018 notified by the MOEF&CC Notification vide G.S.R. 207 (E) dated 30.05.2018. As per the notification, the following 7 chemicals are prohibited to manufacturer, trade, use, import and export: <ol style="list-style-type: none"> I. Chlordecone, II. Hexabromobiphenyl, 	We are not using the said chemicals in any of our production activities. Complied.

	<p>III. Hexabromodiphenyl ether and heptabromodiphenyl ether (commercial octa- BDE),</p> <p>IV. Tetrabromodiphenyl ether and pentabromodiphenyl ether (commercial penta- BDE),</p> <p>V. Pentachlorobenzene</p> <p>VI. Hexabromocyclododecane and vii.Hexachlorobutadine</p>	
30	The industry shall submit the information regarding usage of Ozone Depleting Substance once in six months to the Board.	We are submitting the data once in six months to the Board. Complied.
31	The industry shall develop green belt with native species in all the vacant places. In future, excess green belt over and above 33% of total area can be utilized for industrial activity as per requirement of industry. In any case, the minimum greenbelt shall be 33% of the total area.	Complied.
32	The industry shall install digital display boards at publicly visible places at the main gate indicating the products manufactured Vs permitted quantities, Treated effluent concentrations Vs discharge standards, Stack emission & AAQ concentrations Vs standards, hazardous waste generation, disposed, stock Vs permitted quantities and validity of CTO; and exhibit the CTO order at a prominent place in the factory premises, as per Hon'ble Supreme Court order	We have provided digital display boards at publicly visible places at the main gate indicating the products manufactured Vs permitted quantities, Treated effluent concentrations Vs discharge standards, Stack emission & AAQ concentrations Vs standards, hazardous waste generation, disposed, stock Vs permitted quantities and validity of CTO. Complied.
33	The industry shall submit Half yearly compliance reports to all the stipulated conditions in Environmental Clearance (EC), Consent to Establishment (CTE) and Consent to Operation (CTO) through website i.e., https://pcb.ap.gov.in by 1st of January and 1st July of every year. The first half yearly compliance reports shall be furnished by the industry and second half yearly compliance reports shall be the audited through MoEF & CC recognized and National Accreditation Board for Laboratory Testing (NABL) accredited third party.	We are submitting the CFO/CFE compliance on Half yearly basis. Complied.

34	Any other directions / circulars / notices issued by CPCB, MoEF & CC and APPCB shall be followed from time to time.	Noted and will follow the same
35	The conditions are stipulated without prejudice to the rights and contentions of this Board in any Hon'ble Court of Law.	Noted.
36	The industry shall possess a valid NOC issued by the Andhra Pradesh State Disaster Response and Fire Service Dept., (APSDRFSD) at concerned Regional Office, APPCB	We have Valid Fire NOC up to 26.12.2023 issued by the Andhra Pradesh State Disaster Response and Fire Service Dept. Complied.
37	The industry shall prepare a safety report and carry out an independent safety audit report of the respective industrial activities including chemical storages/ isolated storages by an expert not associated with such industrial activity as required under Rule 10 of MSIHC Rules, 1989 and get it approved by the Factories Dept., and submit the compliance along with copy of the safety report, safety audit report and safety certificate at concerned Regional Office, APPCB.	We have completed third party safety audit-2022 and submitted the same at APPCB. Complied.
38	The industry shall extend training to the working personnel for the prevention of accidents and necessary antidotes to ensure safety, as per the MSIHC Rules, 1989.	Noted and will follow the same
39	The industry shall carryout calibration of safety equipment and leak detection systems at regular intervals and shall certify the same with the Factories Department. That certified copy shall be submitted to the APPCB, Regional Office.	We are performing the calibration of safety equipment and monitoring the leak detection systems at regular intervals. Complied.
40	The industry shall install fluorescent Wind Vane at the highest point in the industry premises.	We have installed fluorescent Wind Vane at various location Z block, SRS, Engg, E block & Gas cylinders storage area. Complied.
41	The industry shall submit Risk analysis and risk assessment covering worst scenario clearly describing impact within the industry premises and outside the industry premises and emergency response system.	Worst case scenarios are covered in HARA report. Complied.
42	The industry shall submit the copy of the safety audit report and On-Site / Off Site Emergency Plans as applicable after being certified by the	We have completed third party safety audit report and OSEP is in place. We will submit to APPCB. Complied.

	Factories Department to the APPCB, Regional Office from time to time, if the storage quantity of hazardous chemicals is equal to or, in excess of the threshold quantities specified in schedule 2 & 3 of MSIHC Rules, 1989.	
Schedule - C		
1	The authorised person shall comply with the provisions of the Environment (Protection) Act, 1986, and the rules made there under.	Noted and will follow the same
2	The authorisation shall be produced for inspection at the request of an officer authorised by the State Pollution Control Board.	Noted and will follow the same
3	The person authorised shall not rent, lend, sell, transfer or otherwise transport the hazardous and other wastes except what is permitted through this authorisation.	Noted and will follow the same
4	Any unauthorized 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 will follow the same
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;	Noted and will follow the same
6	The person authorised 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 will follow the same
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 will follow the same
8	An application for the renewal of an authorisation shall be made as laid down under these Rules.	Noted and will follow the same
9	Any other conditions for compliance as per the Guidelines issued by the Ministry of Environment, Forest and Climate Change or	Noted and will follow the same

	Central Pollution Control Board from time to time.	
Specific Conditions:		
10	The industry shall comply with the provisions of HWM Rules, 2016 in terms of interstate transport of Hazardous Waste and manifest document prescribed Under Rule 18 and 19 of the HWM Rules, 2016.	Noted and will follow the same
11	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 will follow the same. We are disposing the hazardous waste as per the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016.
12	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.	We have dedicated Hazardous waste storage area for storing the hazardous waste/Used oil/ drums containing chemicals / solvents and disposing the waste to authorized vendors. Complied.
13	The industry shall transport the hazardous waste to cement industries only through vehicle fitted with GPS tracking system.	Noted and will follow the same
14	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.	We are maintaining the manifest system as per the APEMC. Complied.
15	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.	We are maintain Form-III & submitting Form-IV. Complied.