

Natco Pharma Limited

Regd. Off.: 'NATCO HOUSE', Road No. 2, Banjara Hills, Hyderabad-500 034. Telangana, INDIA. Tel: +91 40 23547532, Fax: +91 40 23548243 CIN: L24230TG1981PLC003201, www.natcopharma.co.in





26th November' 2021

To

Deputy Director General of Forests (C),

Ministry of Environment, Forest, and Climate Change,
Integrated Regional Office-Hyderabad,
3<sup>rd</sup> Floor, Room No. 309, Aranya Bhavan,
Opp. Reserve Bank of India, Saifabad,
HYDERABAD – 500 004

Dear Sir,

Sub: Submission of Six-monthly compliance report for the period April-2021 to September-2021 for EC – Expansion Order F. No. J – 11011/181/2015-IA. II (I); Dated: 02<sup>nd</sup> May' 2017 – reg;

Please find herewith the enclosed six-monthly compliance report for the period April'2021 to September'2021 for the conditions stipulated in the Environmental Clearance accorded to us vide F. No. J – 11011/181/2015-IA.II (I); Dated: 02<sup>nd</sup> May' 2017 (EC- Expansion)

As advised, by notification No.SO 5845(E) dated 26.11.2018 soft copy of the compliance report sending by e-mail (eccompliance-tg@gov.in) and hard copies not sending to your good office.

This is for your kind information and for your kind perusal.

Thanking you sir,

Yours faithfully,

For NATCO Pharma Limited - Chemical Division

**Authorized Signatory** 

Copy to:

1. CPCB Zonal Office, Bengaluru (by e-mail)

2. TSPCB, Sanathnagar, Hyderabad (Hard copies)

3. TSPCB - Regional Office, Nampally, Hyderabad (Hard copies)

**Manufacturing Site :** Chemical Division (ISO 14001 : 2015 and ISO 45001 : 2018 Certified) Mekaguda (Village), Nandigama (Mandal), Rangareddy Dist., Telangana, India, Pin : 509 223. Tel : +91 8542 226600, 226601, 226602, 226603, 226604, Fax : +91 8542 226614



Mekaguda Village, Nandigama Mandal, Rangareddy District, Telangana Sate, India (Formerly in Kothur Mandal, Mahaboobnagar District, Telangana State)

Half yearly compliance report for the period April'2021 to September'2021 on the conditions specified in Environmental Clearance issued by Ministry of Environment and Forests & Climate Change.

### Ref: Ministry's EC Letter No: F. No. J - 11011/181/2015-IA. II (I); Dated: 02nd May' 2017 (EC- Expansion)

#### A. SPECIFIC CONDITIONS:

S. No.	Conditions	Compliance Details
i	Multi cyclone separator and bag filter with a stack of height of 40m & 30m shall be installed for controlling the particulate emissions (within statutory limit of 115 mg/Nm³) for proposed 10 & 4 TPH coal fired boilers respectively. Adequate stack height shall be provided to DG Set.	Complied.  Multi Cyclone Separator followed by Bag filters provided for coal fired boilers.
		Adequate stack heights (13mts) provided as per CPCB guidelines for all DG sets.
ii	Chilled brine circulation system should be	Complied.
	provided to condensate solvent vapors and reduce solvent losses. It should be ensured that solvent recovery should not be less than 95%.	Secondary condensers with chilled water/brine circulation system installed to reduce the solvent losses there by improving the solvent recovery.
		Breather valves with nitrogen blanketing system and vent condensers installed for all solvent storage tanks.
		Low boiling solvent storage tanks are insulated.
	2	Sprinkler system installed for solvent storage tanks.
		Vent condensers with chilled water circulation system installed for process equipment.
	10	Automatic solvent unloading, dispensing and closed transfer system provided to minimize the human intervention and manual handling errors.
		Solvent management review committee is constituted with cross-functional team for close monitoring of solvent handling operations.



#### CHEMICAL DIVISION

S. No	Conditions	
iii	Process emissions like HCl, SO <sub>2</sub> , NH <sub>3</sub> , Cl <sub>2</sub> . Diethyl amine, Mono methyl amine, HBr., CO <sub>2</sub> & CO vents from the reactor shall be connected to dual scrubber with suitable chilled or room temperature liquid to scrub the emissions effectively. Scrubbed liquid will be sent to ETP for treatment or recovered as by-product.	Process emission vents from the process equipment (reactors, centrifuges, etc.) are being connected to two stage scrubbers with automatic pH adjustment and recording
iv	Fugitive emissions in the work zone environment, product, raw materials storage area etc. should be regularly monitored. The emissions should confirm to the limits stipulated by SPCB.	Fugitive emissions in the week
	Total freshwater requirement from ground water and tankers source shall not exceed 763 m3/day and prior permission shall have obtained from the CGWA/SGWA.	Obtained the ground water permission from SGWA.  We are ensuring that the freshwater consumption shall be within the stipulated limits.  Water meters provided and closely monitoring the water consumption to ensure the compliance.  Water conservation initiatives are implemented.



S. No	Conditions	
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vi	Effluent shall be segregated into High TDS & High COD stream, Low TDS & Low COD stream and Lean Effluent stream. High TDS & High COD stream shall be sent to Stripper followed by Multi Effect Evaporator (MEE), Agitated Thin Film Drier (ATFD), Biological and Reverse Osmosis Plant. The organic distillate from the stripper is sent to incinerator for thermal destruction and aqueous bottom is sent to 1st MEE followed by 1st ATFD. Condensate from MEE and ATFD are sent to Biological (Secondary) treatment followed by tertiary treatment. Low TDS	Complied. All the Effluents are being segregated into High TDS & High COD stream, Low TDS & Low COD stream, Domestic & Utility effluent stream (Lean effluent stream).  Implemented the zero liquid discharge system (ETP-ZLD) for treatment and recycling of effluents within the premises.  High TDS & high COD stream is treated in Priamry treatment followed by Stripper, MEE-1 & ATFD-1. Distillate from Striper is disposed to cement industries for coprocessing/incinerator as per HWM authorization order. Condensate from MEE-1 & ATFD-1 are sent to biological
	& Low COD stream shall be treated in ETP and clarifiers are sent to Decanter Centrifuge feed tank followed by Paddle Dryer to collect the dry sludge for disposal to TSDF.	treatment followed by tertiary treatment.  Low TDS & Low COS stream, Domestic & Utility effluent streams are passed through primary treatment followed by ECOT treatment and two stage biological treatment. Treated effluent is passed through tertiary treatment consists of three stage RO system followed by MEE-2&ATFD-2. Permeate water from RO plants and condensate from MEE-2&ATFD-2 are passed through secondary RO plant to recover pure water and recycled or cooling towers.  Salts from ATFDs are disposed to TSDF for secured landfill.
		Sludge generated from all the clarifiers are passed through sludge decanters followed by sludge dryer. Dried sludge is disposed to TSDF/Pre-processing followed by coprocessing facilities as per HWM authorization order.
vii	and no effluent shall be discharged outside the premises.	Complied.  Implemented the zero liquid discharge system (ETP-ZLD) for treatment and recycling of effluents within the premises.
		Ensuring that no effluent is discharged within or outside the premises.





S. No.	Conditions	Compliance Details
viii	Treated effluent should be passed through guard pond. Online pH meter, flow meter and TOC analyzer should be installed.	Complied.
ix	The company should obtain authorization for collection, storage and disposal of hazardous waste under the Hazardous and Other Wastes (Management and Trans-Boundary Movement) Rules, 2016 for management of hazardous wastes and prior permission from SPCB should be obtained for disposal of solid / hazardous waste in the TSDF. The concerned company should undertake measures for firefighting facilities in case of emergency.	Obtained the Haz.waste Authorization order from TSPCB.  Fire hydrant system, sprinkler systems & first aid firefighting fire extinguishers provided for the haz. Waste
X	The by-products which fall under the purview of the Hazardous Waste Rules, be handled as per the provisions of the said Rules and necessary permissions shall be obtained under the said Rules.	Complied.  Gypsum & Succinamide are the by-products and are included in the Haz.waste arborization order and are being disposed as per HWM authorization order.
xi	(perennial trees) in 40 % i.e., 13.67 Ha.	Complied.  40% of land (13.67 hectares) is dedicated for green belt and developed the green belt with native species and with fruit bearing trees as per CPCB guidelines. Ensured the 10mt wide green belt around the compound wall.
	one Environmental Manager having post graduate qualification in Environmental Sciences / Environmental Engineering.	Complied.  A dedicated Environment Management Cell with a Manager having PG in Env. Science is in place with a total strength of about 50 employees and headed by General Manager – EHS. All EHS activities are being directly overseen by the Director & Board Member.





All the recommendations made in the risk assessment report should satisfactorily implemented.  Complied.  Fire hydrant system with foam monitors installed all around the solvent storage tank farm.  Medium velocity sprinkler system installed for all tanks of solvent storage tank farm.  Dike walls constructed for all solvent storage tanks.  Breather valve with nitrogen blanketing system provided for all solvent storage tanks.  Vent condensers installed for all solvent storage tanks.  Spill control kits provided for all chemical container storage area and spill control procedure in place and all employees have been trained on handling spills.	S. No.	Conditions	Compliance Details
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			installed at up wind/ downwind & cross wind directions and is being monitored continuously and connected to TSPCB





S. No.	Conditions	Compliance Details
xvi	Detectors for process emission detection shall be installed.	
xvii		Complied.  All haz. Wastes are being disposed as specified in the Hazardous Waste Authorization issued by TSPCB.  Evaporation Salts, ETP Sludge and Process Inorganic Salts are being disposed to TSDF (Hyderabad Waste Management Project-HWMP) for secure landfilling during the period: April'2021 to September'2021.  Spent carbon sent to TSDF for incineration during the period: April'2021 to September'2021.  Organic Liquid / Solid waste being sent to cement industries (M/s. Bharathi Cements) for co-processing and distillation bottom residues sent to Bharathi cements and to pre-processing followed by coprocessing unit (GGEPIL, Vikarabad district, Telangana state) during the period: April'2021 to September'2021.  Boiler ash is being sent to Brick manufacturer (M/s. Chennakesava Ankamma Bricks (Srihari Naidu), Vattinagulapally Village, Rajendra Nagar Mandal, R.R. District, Telangana during the period: April'2021 to September'2021.





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S. No.	Conditions	Compliance Details
xviii	All the commitment made regarding issues raised during the earlier Public Hearing / consultation meeting held on 21st December 2016 shall be satisfactorily implemented.	Complied  Implementation of roads & upgradation of hospital are completed.
		Providing medical facilities for the nearby villagers. E-vidya center established at Mekaguda and is operational.
		Extending educational support to the surrounding village children by establishing "Natco High School with XCEED syllabus and CBSE.
		Established after school tuition centers, Vocational training & Career guidance centers.
		Providing safe drinking water by installing RO plants in the villages of Mekaguda, Inmulnarva, Sangiguda, Pitlaguda and for the hamlets of Kolbai Thanda, Jyothia Thanda and Dharmaiah Thanda.
		Veterinary Doctor appointed for providing the medical assistance to the villagers for their cattle health.
		Nutrition centers for pregnant women and build the Anganvadi centers at Mekaguda, Inmulnarva, Rangapur, Chalivendragudem villages.
		Social Forestry in the surrounding villages under "Telangana ku Harithaharam" Project.
	8	We are committed and will extend full cooperation to support the local bodies for implementation of village levelopment.





S. No.	Conditions	Compliance Details
xix	At least 5 % of the total cost of the project shall be earmarked towards the Enterprise Social Commitment based on Public Hearing issues and item-wise details along with time bound action plan shall be prepared and submitted to the Ministry's Regional Office.	Complied. 5% of the project cost is earmarked and as per the action plan the following activities are being implemented:  1. Extension of Hospital at Mekaguda Village – completed.
		<ol> <li>Construction of Eye Hospital at Kothur in coordination with LV Prasad eye institute, Hyderabad – Completed.</li> </ol>
		3. Laying of Road from National Highway to Mekaguda village – Completed and planted tress both sides of road with gourd arrangement.
	(4)	4. Extended road from Mekaguda to Kolbai Thanda completed.
		<ol> <li>Providing Mobile ambulance with Doctor for serving surrounding villagers. – on going – Mobile ambulance &amp; doctor is in place and serving the villagers</li> </ol>
		<ol> <li>Providing salaries for additional teachers appointed in Mekaguda School. — Ongoing.</li> </ol>
	T T	7. Associated with gram panchayat and implemented the "Haritha haram at Mekaguda village and planted 5000 tree saplings and provided the tree guards and maintaining.
		8. Newly 1000-litre capacity RO plant was installed at Buchiguda village, Nandigama Mandal, R.R Dist.
		9. Conducted a free screening camp for breast & cervical cancer in Mekaguda





Mekaguda Village, Nandigama Mandal, Rangareddy District, Telangana Sate, India (Formerly in Kothur Mandal, Mahaboobnagar District, Telangana State)

#### B. GENERAL CONDITIONS:

S. No. Conditions  The project authorities must strictly adhere to the stipulations made by the State Pollution Control Board (SPCB), State Government and any other statutory authority.  All stipulations made by the Telangana Statutory authority.  Control Board are being compiled from Valid consent order is in place and is 31.03.2025.  The project authorities must strictly adhere to the stipulations made by the Telangana Statutory authority.  Complied.  Complied.  Complied.  Complied.  Complied.  We will ensure that no further expansion of apart from the permitted EC-Expansion or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.  The locations of ambient air quality monitoring stations shall be decided in	State Pollution
to the stipulations made by the State Pollution Control Board (SPCB), State Government and any other statutory authority.  All stipulations made by the Telangana State Control Board are being compiled from Valid consent order is in place and is 31.03.2025.  No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.  The locations of ambient air quality monitoring stations shall be decided in	State Pollution
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to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.  In case any deviations / alterations to project will be submitted to the Ministry.  The locations of ambient air quality monitoring stations shall be decided in	imbuy.
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environmental protection measures required, if any.  The locations of ambient air quality monitoring stations shall be decided in	me proposed
iii The locations of ambient air quality monitoring stations shall be decided in	
monitoring stations shall be decided in	
monitoring stations shall be decided in	
consultation with the State Pollution As per the suggestions of TSPCB, onlin	e continuous
Collifor Board (SPCB) and it shall be ambient air monitoring gyrotom installat	
that at reast one station is instance	
well as where maximum ground level concentration is anticipated and connected concentrations are anticipated.	to CPCB &
concentrations are anticipated. TSPCB servers.	
	5 7 -
Engaged an external NABL & MoEF & (	CC approved
laboratory for monitoring of ambient	air in three
locations in the plant as per CPCB guideline	
Three continuous ambient VOC monitor	ring stations
installed at up wind/ downwind & cross wi	na directions
and connected to TSPCB server.	
iv The National Ambient Air Quality Complied. Emission Standards issued by the Ministry	
vide G.S.R. No. 826 (E) dated 16 <sup>th</sup>	
November, 2009 shall be followed. Engaged an external NABL & MoEF & O	CC approved
laboratory for monitoring of ambient a	air in three
locations in the plant as per CPCB guidel	
No. 826 (E) dated 16 <sup>th</sup> November 2009)	ines (GCD
110. 020 (L) dated 10 110VeIIIDEF 2009)	ines (G.S.R.
	ines (G.S.R.



S. No.	Conditions	Compliance Details
v	The overall noise levels in and around the	Compliance Details Complied.
	plant area shall be kept well within the standards by providing noise control measures including acoustic hoods silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall confirm to the standards prescribed under Environment (Protection) Act, 1986	Noise levels are within the stipulated limits. Noise monitoring is being carried out in house at regular intervals and engaged an external NABL & MoEF & CC approved laboratory.
	Rules, 1989 viz. 75 dBA (daytime) and 70 dBA (nighttime).	fitted with silencers and acoustic enclosures to control the noise levels. Air Compressors are enclosed with acoustic panels to ensure the Noise levels are being
		monitored daytime and nighttime by in-house sound level meter and being monitored by external NABL & MoEF & CC approved laboratory.
vi	The company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and use the same water for the process activities of the project to conserve fresh water.	Complied Rainwater harvesting and recharge system implemented for the entire campus under the guidance from Mr. Ayyappa Masagi of Water Literacy Foundation & Rainwater Concepts Pvt Ltd. with a capital cost of 125 Lakhs (Rainwater run off collection, storage and reuse system, run off collection and recharge structures, harvesting pits, check dams and bore well recharge structures constructed).  Water conservation initiatives implemented (such as low flow taps, Low flush urinals & water closets, hydro jets for equipment cleaning, etc.)
vii	regular basis. Training to all employees on handling of chemicals shall be imparted.	Complied Training calendar & training modules developed to cover all employees and training are being conducted at regular intervals on water conservation, handling of wastes, Environment protection, Emissions control, Fire safety, process safety, electrical safety, gas cylinders handling, Static electricity, safe handling of flammable & hazardous chemicals, safe handling of toxic chemicals, etc.  Pre-employment medical checkup and periodical
		medical examinations are being conducted for all employees.



S. No.	Conditions	Compliance Details
viii	The company shall also comply with all	Complied
	the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, risk mitigation measures and public hearing relating to the project shall be implemented.	We are ensuring the compliance to all the applicable rules and regulations, environmental protection measures mentioned in the Environmental Management plan to protect the environment.
ix	The company shall undertake all relevant	Complied.
	measures for improving the socio- economic conditions of the surrounding area. CSR activities shall be undertaken by involving local villages and administration.	The following Socio-economic development measures are being implemented in the surrounding area through our Natco Trust.
		Safe drinking water supply by installing RO plants at all villages and are being maintained by us.
	,	<ul> <li>Providing high quality education by our Natco High School from KG to 10<sup>th</sup> Std.</li> </ul>
		Providing additional teachers in Govt. schools and paying salaries to them.
		Conducting skill development programs for the local youth through our Vocational training centers.
		Providing nutritional food, the poor pregnant women through our Nutrition centers.
		<ul> <li>Providing medical facilities through our hospitals and through mobile ambulance services.</li> </ul>
		Providing veterinary medical services to the villagers through our Veterinary Doctor.
	,	Supporting village development programs.
*1		<ul> <li>Provided Anganwadi School (which was previously a government school and converted with the help of NATCO Trust) at Mekaguda Rangpur and Pitlaguda village.</li> </ul>





S. No.	Conditions	C. II. D. II.
X	TIL.	Compliance Details
	The company shall undertake eco- developmental measures including community welfare measures in the project area for the overall improvement of the environment.	The Company had taken up eco development measures
		"Vana Yagnam" to increase the green belt in the nearby community.
		Taken up the "Haritha Haram" initiative and received the "Haritha Mithra" Award from Telangana State Government for the year 2016.
		Donated tree sapling & tree guards for plant protection around Nandigama Mandal, Rangareddy District (Formerly Kothur Mandal, Mahaboob Nagar District).
	2	Conducting several health camps, free medicines, nutrition programs, community outreach programs are being conducted.
		Environmental management Programmes for environment and eco-development are being taken up at our Natco School, Rangapur.
xi	Cell equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.	Complied.  A dedicated Environment Management Cell with a Manager having PG in Env. Science is in place with a total strength of about 50 employees and headed by GM-EHS. All EHS activities are being directly overseen by the Director & Board Member.
		Dedicated Env. Laboratory is in place and is equipped with all infrastructural facilities to carry out the analysis of effluents on daily basis. Online continuous monitoring systems installed for pH, EC, TOC, COD, TDS, flow, stack emission monitoring and ambient air monitoring.



Mekaguda Village, Nandigama Mandal, Rangareddy District, Telangana Sate, India (Formerly in Kothur Mandal, Mahaboobnagar District, Telangana State)

S. No.	Conditions	Compliance Details
xii	The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment and Forests as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environmental management / pollution control measures shall not be diverted for any other purpose.	Sufficient Funds earmarked for Environmenta Management Systems Implementation. The funds so provided is not diverting for any other purpose and no constraints for budget.
xiii	A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zilla Parishat / Muncipal Corporation, Urban local body and the local NGO, if any, from whom suggestions/representations, if any, were received while processing the proposal.	Complied.  A copy of the EC order submitted to Gram Panchayat on 18.05.2017 and Zilla Parishad office on 17.05.2017.
xiv	including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six-monthly compliance status report shall be posted on the website of the company.	Complied.  Six monthly compliance reports soft copy being submitted to MOEF&CC regional office, CPCB Zonal office through e-mail (as per the notification No: SO5845(E), dated:26.11.2018, hard copies not sending to regional office)  Also uploaded on company website.
ΚV		Copy of this condition wise compliance report and EC order (Expansion EC order received on 02 <sup>nd</sup> May'2017) uploaded on our company website.
	V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment	Environmental Statement in Form-V for the financial year ending 31 <sup>st</sup> March-2021 is submitted on 23 <sup>rd</sup> September-2021. Also uploaded on company website.

NANDIGAMA (M). RANGA REDDY DIST



S. No.	Conditions	Compliance Details
xvi	The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at Website of the Ministry at <a href="http://moef.nic.in">http://moef.nic.in</a> . This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional Office of the Ministry.	Project Clearance (EC) Notification given in two local leading newspapers (Eenadu & Deccan Chronicle) on 17.05.2017 about the Environmental Clearance accorded by the Ministry and the copies of advertisement was submitted to MoEF&CC Regional Office through company letter dated: 17.05.2017 by speed post on 18.05.2017& soft copies sent by mail on 19.05.2017
xvii	The project authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.	Project activities completed and obtained the CFO from TSPCB and the plant is operational.

