

### ANDHRA PRADESH POLLUTION CONTROL BOARD REGIONAL OFFICE, VIJAYAWADA.

Plot No.41, Sri Kanakadurga Officers' Colony, Gurunanak Road,Vijayawada – 8.

Phone No.:0866-2543542.

Date 56-12-2017

Τo

Sri S.K. Srivastava The Director, IA-II Division, Ministry of Environment, Forest & Climate Change, Indira Paryavaran Bhawan, Jor Bagh Road, New Delhi-110003

Sir.

Sub:- APPCB - RO - VJA - M/s. Sarvani Labs Pvt. Ltd., Jayanthipuram (V), Jaggalahpet (M), Krishna District, Andhra Pradesh -- Proceedings of the public hearing held on 22-12-2017 at 03.00 PM at Jayanthipuram (V), Jaggaiahpet (M), Krishna District, Andhra Pradesh - Minutes of the Public Hearing – submitted – Reg.

Ref:- 1. EIA Notification No. S.O. No. 1533, dated 14-09-06 and its amendments thereof, issued by the MoE&F, GOI.

- TOR F.No.J-11011/38/2017-IA-II(I), dt. 31-05-2017
- Public hearing held on 22-12-2017.

With reference to above it is to submit that Public Hearing was conducted on 22-12-2017 at Jayathipuram (V), Jaggaiahpet (M), Krishna District, Andhra Pradesh with respect to establishment of bulk drug and intermediate manufacturing unit proposed by M/s. Sarvan Labs Pvt. Ltd.

Copies of the Paper advertisements, Public Hearing attendance, minutes of the public hearing, Statement of representations received along with proponent's response and Videography are herewith enclosed for kind information and for taking necessary action.

Yours faithfully,

Encls:- 1. Approved Minutes of the Public Hearing

Paper Advertisements.

3. Statement of representations received and proponent's response

4. Copy of the Representations

5. Attendance of PH

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6. Videography of public hearing

Copy submitted to the Member Secretary, A.P.Pollution Control Board, Vijayawada for favor of kind information.

MINUTES OF THE ENVIRONMENTAL PUBLIC HEARING HELD ON 22.12.2017 AT JAYANTHIPURAM (V), JAGGAIAHPET (M), KRISHNA DISTRICT FOR THE PROPOSAL FOR MANUFACTURING OF BULK DRUGS AND INTERMEDIATES BY M/s. SARVANI LABS PVT., AT SY. NO. 109, JAYANTHIPURAM (V), JAGGAIAHPET (M), KRISHNA DISTRICT.

#### **PANEL MEMBERS:**

1. Sri B.R.Ambedkar,

Chairman,
District Revenue Officer &
Additional District Magistrate,
Krishna Dist.

Sri E.Satyanarayana, Environmental Engineer Rept. of A.P.Pollution Control Board, Regional Office, Vijayawada, Krishna Dist., Andhra Pradesh

#### **Industry Representatives:**

Sri K.Venkata Mahesh, Managing Director, M/s.Sarvani Labs Pvt. Ltd.,

#### **Environmental Consultants:**

Sri Yarlagadda Venkata Prasad, M/s. Rightsource Inudstrial Solutions Pvt. Ltd.

At the outset, the Environmental Engineer, APPCB, RO, Vijayawada welcomed the public gathered for the Environmental Public Hearing and briefed about the proposal of M/s. Sarvani Labs Pvt. Ltd., that they proposed to set up a unit for manufacturing of bulk drugs and intermediates at Jayanthipuram (V), Jaggaiahpet (M), Krishna Dist. with an investment of Rs.6.38 crores. He further informed that as per the Ministry of Environment, Forests & Climate Change, GOI Notification, dated 14.09.2006, for the projects listed in Category-A 5(f) of the Schedule, Environmental Public Hearing is mandatory to be conducted as part of obtaining Environmental Clearance (EC). In accordance with the procedure prescribed for the public hearing in the MoE&F notification dt. 14.09.2006, the AP Pollution Control Board, Vijayawada issued press advertisement in Eenadu (Telugu) and Indian Express (English) daily news papers on 20.11.2017 about the environmental public hearing inviting concerns of the public, comments, views, objections, apprehensions, clarifications and suggestions etc., if any, on the project proposal in writing from the public, bonafied residents, environmental groups and others located near the proposed project area likely to be

A.P. Pollution Control Board PLOT NO. 41, GURLINANAY CONTROL

affected for a minimum period of 30 days. He added that the copies of Draft Environmental Impact Assessment (EIA) report and the Executive Summary in Telugu & English were made available to the Public at the places mentioned in the advertisement. During the period of 30 days from the date of issue of advertisement, the AP Pollution Control Board received the representations from the following:

- Sri Sandala Srinivasa Rao, Jaggaiahpet, Krishna Dist.
- ii. Sri Kota Indira, Williampeta, Jaggaiahpet, Krishna Dist.
- iii. Sri D.John Paul, Jaggalahpet, Krishna Dist.
- Sri H.Madhubabu, President, Rural Environment Education and Health Awareness Society, Hyderabad (through mail).
- v. Sri V.Sunanda Reddy, NGO, Hyderabad (through mail).

The same were forwarded to project proponent for their response.

He added that the proceeding of the public hearing would be submitted to MoEF &CC, GOI., along with the statement of representations received and the proponents are response for taking further necessary action. He requested the District Revenue Officer & Additional District Magistrate, Krishna district to conduct the proceedings.

Sri B.R.Ambedkar, District Revenue Officer & Addl. District Magistrate, Krishna District while welcoming the public and press stated that the purposes of the public hearing is to obtain the views / suggestions / objections of the public and the officials would note down the public views. The Proceedings and video of the public hearing would be forwarded to MoEF, Gol for further course of action. He requested the public who attended the meeting to express their comments, views, objections, apprehensions, clarifications and suggestions etc., if any, on the project proposal. Then he requested the management of the project to explain in detail about the proposed bulk drug industry its environmental impacts and control measures proposed.

Sri K.Venkata Mahesh, Managing Director of M/s. Sarvani Labs Pvt., while briefing about the project informed that they proposed to establish a bulk drugs and intermediates manufacturing industry in an extent of 2.93 Acres at Sy No: 109, Jayanthipuram Village, Jaggayyapet Mandal, Krishna District, Andhra Pradesh with an investment of of Rs. 6.38 Crores which includes construction of the buildings, equipment, machinery and greenbelt development.

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ENVIRONMENTAL ENGINEER

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He informed that the project proposal was considered and appraised by the Expert Appraisal Committee (EAC) in its 20<sup>th</sup> Meeting held during 27<sup>th</sup> - 28<sup>th</sup> February, 2017. The MoEF&CC has given Terms of Reference vide F. No: J-11011/38/2017-IA II (I) Dated on 31<sup>st</sup> May 2017, to carryout EIA Study. The Environmental monitoring and analysis were carried out during the period of **March** – **2017 to May** – **2017** and Draft EIA Report was prepared and submitted for Public Consultation.

He assured the gathering that they would operate the unit after taking into confidence of the public in terms of pollution control measures. He assured that the management would allocate funds of Rs.32 lakhs for the welfare of surrounding villages under Corporate Social Responsibility (CSR). He appealed the public to understand the technical details of the project and to clarify their apprehensions. Then he requested their environmental consultant to brief about technical issues of the project.

Sri Yarlagadda Venkata Prasad, Representative of M/s. Rightsource Industrial Solutions Pvt. Ltd, informed that they have conducted Environmental Impact Assessment studies on the proposed project which includes baseline studies before establishment of the industry and impact assessment on the Environment after establishment and operation of the industry. He informed that the base line data were monitored and collected during the study period of March 2017 – May 2017.

Ambient Air Quality Monitoring (AAQM) was carried out at eight locations surrounding the proposed project and results obtained are observed to be well within CPCB standards. The Maximum concentration of Particulate Matter (PM<sub>10</sub>) is recorded to be 69.73 μg/ m³ at Dhrmavarappadu Tanda against the CPCB standard of 100 μg/ m³ and maximum concentration of Particulate Matter (PM<sub>2.5</sub>) is noted as 28.21 μg/ m³ at Jaggayapet against the CPCB standard of 60 μg/ m³. Sulpur dioxide (SO<sub>2</sub>) is observed to be maximum of 17.84 μg/ m³ at Dhramavarappadu Tanda, which is also well within the CPCB standard of 80 μg/ m³. Maximum concentrations of Oxides of Nitrogen (NOx) was observed to be 25.39 μg/ m³ prevailing at the time of sampling at Dhramavarappadu Tanda which is also well below the prescribed limit of 80 μg/ m³. The highest value of Carbon Monoxide (CO) is recorded as 0.85 mg/ m³ at the project site against the prescribed standard of 2 mg/ m³. The Highest value of

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Ammonia (NH<sub>3</sub>) is observed to be 26.24  $\mu$ g/ m<sup>3</sup> at Jaggayyapet, which is well below the prescribed limit of 400  $\mu$ g/ m<sup>3</sup>.

Ground water samples and surface water samples were collected at 8 locations in the study area. The analysis results of the samples collected were studied and found to be acceptable limits of IS-10500, for parameters TDS, Total hardness, Total Alkalinity, Calcium, Magnesium and Chlorides.

Noise level monitoring was carried out at eight locations and the noise levels at all the locations were below the permissible limits.

On data obtained, the soil quality around the site is appropriate and normal in terms of soil contaminants.

The predicted ground level concentrations when added to Baseline scenario, the overall scenario levels of PM, SO<sub>2</sub> and NO<sub>x</sub> are well within the permissible limits as specified by NAAQ Standards.

He briefed about the project details and Environmental Management Plant as follows.

- The total production capacity of Bulk drugs and Intermediates will be 9.00
   TPM consisting of five products. Solvents will be recovered upto 95% using distillation column with necessary cooling condensers.
- Total water requirement of the project will be 38.50 KLD for Process, washings, Boiler Makeup, cooling towers makeup, scrubber, domestic and greenbelt purpose. The waste water generation will be 10.64 KLD which is from process, floor & reactor washes, cooling tower blow down, boiler blow down, scrubber, DM plant and domestic usage. The waste water is segregated into HTDS effluent and LTDS effluent.

Zero Liquid Discharge (ZLD) concept will be adopted for treatment and disposal of effluent. The Effluent Treatment system consists of steam stripper, MEE system with 10 KLD capacity & ATFD. Further the Biological Treatment with 15 KLD capacity and Reverse Osmosis plant will be installed for treatment of effluents generated from plant operations.

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From ZLD system 8.87 KLD of water will be recovered and reused for plant operations. Hence, the fresh water requirement will be 29.63 KLD and also informed that the project authorities obtained permission for with drawl of ground water from the SGWD.

- Power requirement for the project is 500 KVA for plant operations. A DG Set of 320 KVA will be installed.
- 3 TPH Coal Fired Boiler will be installed, provided with Cyclone Separator followed by Bag filter and the stack height of 30 Mtrs for good dispersion.

The Predicted process emissions are  $SO_2$ ,  $O_2$ ,  $H_2$  & HCI from manufacturing process of proposed products and these emissions will be mitigated using two stage scrubber.

The industry will take measures for reduction of fugitive emissions emanating out of process reactions by providing vent condensers.

- The Solid waste and Hazardous waste generated will be disposed as per the
  rules. There will not be any leakages / spillage from the raw-materials storage.
   The generated hazardous waste will be stored on floor with suitable packing
  and this dedicated area will be covered with the roof.
- Extensive oiling, lubrication and preventive maintenance will be carried out for the machineries and equipments to reduce noise generation. Further, green belt development also reduces the noise pollution.
- It is proposed to develop 4329,25 Sqm (i.e 36.87 %) of green belt in the total site area of 11843 Sqm.

He further informed that M/s. Sarvani Labs Pvt Ltd has committed to implement all the pollution control measures to protect the surrounding environment by adopting Zero-Liquid-Discharge System for all its Effluents, by controlling process emissions and Safe-Disposal of all Solid Wastes generated either as process wastes or packing wastes. The Environmental management Plan budget for proposed project is Rs. 100 Lakhs and recurring cost is Rs. 19 Lakhs per annum.

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The District Revenue Officer, Krishna District requested the public to express their concerns, opinion, suggestions, views etc. on the proposed project.

### 1. Srí Malaavath Venkateswar Nalk, Jayanthi puram:

He welcomed the industry in Jayanthipuram village and opined that more industries should come in this area.

#### 2. Sri Islavath Srinu, Janyanthipuram village:

He supported the industry coming up in this village which will reduce the unemployment of the youth. He suggested tree plantation shall be taken up in the villages to reduce the pollution and it should be at the beginning of the construction of industry.

#### 3. Sri V.Mallikarjuna Rao, Sarpanch, Jayanthipuram village:

He welcomed the project and informed many more industries like this should come in this village which is the only solution of unemployment.

#### 4. Sri Ch. Guravayya, Jayanthipuram village:

He also supported the industry coming up in this area and informed that it would helpful to the youth for employment. He referred about the CSR Activities which should be spent in the surrounding villages only. He further informed that by establishing the industries the Panchayath also get beneficiated financially. He suggested that there shall not be any odour nuisance from the proposed industry and the villagers shall not get affected due to odour.

#### 5. Sri Narikella Nagabhushana Rao, Jayanthipuram village:

While welcoming the industry, he informed that employment should be given on priority to local educated youth. The industry management should be helpful to the poor people of the village.

#### 6. Sri I.Nageswara Rao, K.Agraharam:

He also welcomed the industry coming up in this area. He also suggested to give priority to local villagers for employment and development activities for the surrounding villagers.

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#### 7. Sri Gundla Krishna Rao, K.Agraharam:

 While welcoming the project, informed that employment on priority to local youth. Further he suggested that there shall not be any pollution problems in the surrounding villages.

#### 8. Sri Bandla Gynana Prakash Rao, Jayanthipuram village:

While welcoming the project, he referred about the employment to the local educated youth.

#### 9. Sri Kota Raja Rao, Jaggalahpeta:

He welcomed the CSR fund to be spent by the Managing Director. He suggested that spending of CSR fund should not be limited to Jayanthipuram village, it should be extended to Jaggaihpeta and other villages. Environmental conditions in Jaggaihpeta should be improved by taking up of tree plantation and their protection which would control the temperatures in Jaggaihpeta.

#### 10. Sri Muliangi Rama Krishna Reddy, Sarpanch, Pochampally:

He informed that the industries in this area are not extending any help to Pochampally village though it is existing very close to industries. He requested the industries to extend their help on par with the villages where the industries are located. The surrounding villages shall also be developed financially. While welcoming the project he suggested that if at all any pollution problems / damage to the villagers, the industry should be closed accordingly a GO should be issued by the Government.

#### 11. Sri Sunandha Reddy, NGO:

He welcomed the Project and supported for issuing of license. He suggested the following to be taken up by the Proponent.

- Rain water harvesting structure shall be constructed for raising of ground water table.
- ii. He welcomed the 36% of greenbeit as proposed by the proponent. He suggested that the greenbelt shall have medicinal plants and fruit bearing trees.

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PLOT NO. 41. G. C. C. C. C. C. C.

- The industry management shall impart training to local youth for skill development.
- iv. Water, air and soil shall not be polluted in the surrounding villages.

#### 12. Sri Y. Chenna Kesava Reddy, NGO, Hyderabad:

While welcoming the project he suggested the following.

- Employment shall be given to local youth only.
- CSR funds shall be spent to villages within 10 kms from the project site.
- iii. STP and water treatment plants shall be established.
- iv. Medical camps shall be taken up in the surrounding villages.

#### 13. Sri Dhundigala Anjayya, NGO, Nalgonda:

He welcomed the project and it would be helpful for giving employment to the locals. He suggested that CSR funds shall be spent to the surrounding villages.

#### 14. Sri Perika Krishnayya, NGO, Hyderabad:

He supported the project and suggested that employment shall be given on priority to local youth and CSR fund shall be spent for local poor people.

#### 15. Sri Vijaya Reddy, NGO, Hyderabad:

He mentioned that the study on agricultural sector, animal husbandry, human life period was not carried out in EIA report. He suggested the above points shall also be included in EIA. Though the chemical industries adopted ZLD the pollution of Rivers are not stopped. He referred about the sustainable development and the industries should adopt the systems accordingly. He also referred about the release of pollutants like SO2 and NOx in huge quantities from the proposed industry which would affect the environment. He mentioned that the CSR fund allocated by the proponent is not covered under CSR GO.

#### 16.Sri Lavanam Chandhra Shekar, NGO, Nalgonda:

He welcomed the project and suggested that employment shall be given to local youth.

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The **District Revenue Officer** asked the Project Management to respond on the issues raised by the public.

Sri K.V.Mahesh, Managing Director while inviting the public response on welcoming the project, stated that they would voluntarily allocate a fund of Rs.32 lakes to spent under CSR. He assured that the local educated youth would be given preference in employment for local villages. Further they would extend their guidance / help to local youth for development of skills for employment. He was very much thankful to the public who attended the public hearing for the support of industry.

The **Environmental Engineer** informed that 16 nos. of written representations received during the public hearing and the same were communicated to the Project proponent for their response. All the written representations along with the response of the project proponent would be tabulated and will be submitted along with minutes.

**The District Revenue Officer,** While concluding the public hearing summed up the public opinion expressed and informed that the minutes recorded along with the response of the project proponent on the points raised shall be submitted to MOEF & CC, GOI for taking a decision.

The Environmental Engineer, AP Pollution Control Board proposed vote of thanks for the Chair.

District Revenue Officer & Additional District Magistrate Krishna Dist.

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## GIST OF REPRESENTATIONS RECEIVED BEFORE AND DURING PUBLIC HEARING WITH PROPONENT RESPONSES

S. No	Name and address of the Persons	Gist of the Representations	Response of the Project Proponent
1.	Sri S. Srinivasa Rao, Ayyappa Nagar Jaggaiahpet , Krishna Dist	He asked about the land ownership of proposed site and land conversion before project establishment. He mentioned about existing pollution problems caused by the existing industries in the surrounding areas.	We have entered in to a sale agreement with the land owners pertaining to Sy.No:109 in an area of 2.93 Acres on 15.09.2016. 2.00 Acres land was purchased on 14/03/2017 and
2.	Sri D.John Paul Social Engineer Muktyala Road, Jaggaiahpet , Krishna Dist	of 5 kilometers already polluted by the industries MCL - Jayanthipuram, Amoda Iron and Steel Industries and other cement industries of this area.  • Most of the villagers are suffering from respiratory diseases which cause TB and other chest diseases, the infant babies are prone to respiratory diseases like	We ensure that due to our industry there will not be any air pollution to the surrounding area. We are taking necessary steps to prevent air pollution.     The emissions released from process are neutralized in the scrubber using caustic lye solution and chilled water. Hence our industry will not create any pollution to the surrounding area.
3.	Smt. Kota Indira Williampeta, Jaggaiahpet , Krishna Dist	nights by the MCL, M/s. Jaypee Industries at Budavada damaging all crops thus affecting the cultivation and farming community.  Feeding grass/fodder becomes scarcity, the domestic animals like goats and sheeps, Buffalos, cows unable to get good strengthy	<ul> <li>The generated liquid effluent will be treated in stage wise in Zero Liquid Discharge system. The treated water is used again in the plant.</li> <li>The particulate Matter/ Dust released from 3 TPH boiler will pass through the cyclone separator and bag filters to reduce the emission levels.</li> <li>Our industry will not cause any diseases to the surrounding area people. Particulate Matter is well within the limits and gas emissions are neutralized in the scrubber.</li> <li>The generated gas emissions are SO2 &amp; HCI are scrubbed in the scrubber to neutralize the same. Hence, no gas emissions into air.</li> </ul>

S.	Name and address of	Gist of the Representations	Response of the Project		
No	the Persons	climatic conditions as a result the people in this area likely to prone skin cancers and other Dermatological diseases.  The monkey rehabilitation centre nearby this area severely affected by the harmful gasses and polluted water released by pharmaceutical companies were observed by the ground water and got polluted.	Proponent		
4.	Sri H. Madhubabu, REEHAS, President, Musheerabad, Hyderabad	He welcomed the establishment proposed project and given some suggestion to the project proponent.	Thanked him for his support about project establishment. The possible suggestion given by him will be implemented.		
5.	Sri V. Sunanda Reddy, President, Dharithri Paryavarana Parirakshana Samastha , Shivaji Nagar, Nalgonda Disrict, Telangana State.	He expressed his support for the establishment of this industry in terms of local employment & development and gave few suggestions for Ecological balance.	Thanked him for his support and we will implement the possible suggestions.		
6.	Sri Thota Hussain Naidu , BJP, huzurnagar Constituency, Mellacheruvu (V & M), Suryapet (Dt), Telangana State	He welcomed the proposed project with some suggestions as mentioned below  Suggested some plant species for green belt development to mitigate air emissions and odour problems.  Installation of ETP plant for treatment and reuse of wastewater generated from plant.  Development of Green Belt to control Noise pollution and to maintain noise levels within the limits i.e 65 dB (A).  Infrastructure Development and employment generation within the surrounding areas.	Thanked him for his support. We will develop the greenbelt with native plant species to mitigate air emissions and odour problems. We install ZLD system to treat and reuse the generated effluents.		
7.	Sri Y. Chenna Kesava Reddy, N.G.O	He welcomed the proposed project and given below mentioned Suggestions & References  CSR fund to be allotted only to the effected villages.  Regular medical camps  Skill development  Employment to the locals.  CSR fund to be spent in the	Thanked him for his support. We will allocate the CSR funds to the effected villages and we will develop avenue plantation.		

S. No	Name and address of the Persons	Gist of the Representations	Response of the Project Proponent
_		villages of 10 Km radius.  Installation of Effluent treatment Plant.  Road side plantation.	
8.	Sri Krishna Murthy, N.G.O, Hyderabad	He welcomed the proposed project with some suggestions as mentioned below  Control of Air pollution from the plant operations.  Waste water generated from the plant operations to be treated in ZLD system and prevent water pollution.  He suggested that noise pollution will be controlled by developing Green Belt and providing acoustic enclosure to the DG Sets.  Proper management of Solid waste to prevent soil pollution.  He suggested developing green belt to prevent pollution problems.  Employment to the locals.  CSR funds to be spent in the surrounding areas.	Thanked him for his support. We are going to erect ZLD system to treat the generated effluents and to reuse the treated water. We will dispose the solid/hazardous waste as per the rules. We will develop greenbelt in 36 % of the total project area.
9.	Sri Y. M.N. Reddy, DANDA Kondamma Charitable Trust, T.Sunkesula ( V & P), Yerraguntla Mandal, Y.S. R. District, Andhra Pradesh.	He welcomed the proposed project and given below mentioned Suggestions & References  References Rainwater Harvesting Structure to be developed.  Skill development. Employment to the Local people.	Thanked him for his support. We will develop rainwater harvesting structures at nearby villages and roof water harvesting structures in the plant area. Maximum employment will be given to the local people.
10.	Sri Ravi Kumar Nandipati, Environment Volunteer & Senior Journalist, H.No. 6-197/24, Laxma Reddy Palem, hayatnagar, Hyderabad	He welcomed the project and stated that the establishment of new industries will helps in financial growth and development of the State.  He congratulated the project management and the consultant for their EIA report.  He suggested the CSR fund allocation to the below mentioned works.  • Special Skill training programmes to the local unemployed people.  • Health camps in the local	Thanked him for his support.  We will impart training programmes and career guidance programmes to the local un employed people.  We will provide career guidance to the youth for their better job opportunities.

S. No	Name and address of the Persons	Gist of the Representations	Response of the Project Proponent
		villages.  • Green belt development to reduce noise pollution.	
11.	Sri I Madhu and Sri B V Reddy, Aashraya Rural Development Society	They stated that their society has no objection for the establishment of the proposed project.  He suggested the management to provide the local employment, allocation of CSR funds to the surrounding areas and development of green belt for protection of environment.	Thanked him for his support. We assured that maximum employment will be given to the local unemployed people.
12.	Sri S. Venkateswarulu , N.G.O Rastra Paryavarana Parirakshana Gramina Vikasa Vedika, H.No: 11-262, Naidupeta Street, Mellachrvu-508246, Suryapeta District, Telangana State	He welcomed the project. He suggested that the project authorities should take all the Environment protection measures to control pollution. Take all necessary measures to control the Air pollution and water pollution. Provide common infrastructure measures like Drinking water, Education and Health to the local villages.	Thanked him for his support. We will take all necessary measures to control the pollution from plant operations. We will provide RO water plant for drinking water to the Jayanthipuram village and to the villages near to the project.
13.	Sri S. V Krishna , N.G.O, Neethaa Swachanda Seva Society, Sanjeeva Sadan, Abdulla Khan Estate, Kurnool	<ul> <li>While welcoming the project he has given the below mentioned suggestions to the project proponent.</li> <li>CSR fund to be allotted only to the effected villages.</li> <li>Local employment to given by providing skill development training.</li> <li>Green belt development.</li> </ul>	Thanked him for his support. CSR funds will be spent to the effected villages. We assured that maximum employment will be given to the local unemployed people.
14.	Sri Lavanam Chandra Sekhar, President, Sri Vamshi Arts Academy, H.No:5-48, Meruwada, Ramannapet, Nalgonda District, Telangana State	He stated that he has no objection if the project gets approval for the establishment. If the project gets approved unemployment problem will be solved. CSR funds will be spent in the local villages for development.  Green belt should be developed.	Thanked him for his support. We will allocate the CSR funds to the effected villages and we will develop avenue plantation.
15.	Environmental Control Organization for Anti Pollution (ECOFAP) (NGO)	They requested the MoEF & CC to grant approval to the Industry on behalf of their organisation. Suggested the project authorities to provide employment to the local people.	Thanked him for his support. We assured that maximum employment will be given to the local unemployed people.
16.	Sri Chepuri Raju, State	He welcomed the project and	Thanked him for his support.

Ş. No	Name and address of the Persons	Gist of the Representations	Response of the Project Proponent
	Secretary, Telangana State, Dalitha Bahujana Party, Flat No. 303, 3 <sup>rd</sup> Floor, Mogal Apartment, Deccan Towers, Basheerbagh, Hyderabad.	asked project proponent, to provide employment to the local unemployed people, control water pollution and protect animals & Birds from pollution.	We assured that maximum employment will be given to the local unemployed people. We will take all necessary measures to control the pollution.
17.	Srì Cherukori Venu Gopal ,FFAAP	He submitted a representation having a set of suggestions about the proposed project.	Thanked him for his suggestions and we will incorporate the possible modifications with the final EIA report.
18.	Sri A. Sudarshan, Director, Cheyutha Rural Development Society, Door No: 1-191, Gandhi Nagar, Wadapally, Damaracherla Mandal,	He welcomed the establishment of the proposed project. He asked to spend the CSR funds to the education and Health purpose, employment to the local people, follow the MoEF & CC rufes and Regulations and Develop 30 % green belt.	Thanked him for his support. We will develop 36 % green belt within the plant premises.
19.	Sri Govindu Kumara Swamy, President, Sri Rama Goo Samrakshana Shala	While welcoming the project he asked the project proponent, to provide employment to the local unemployed people, to Develop Green Belt, to control water pollution and protect animals & Birds from pollution.	Thanked him for his support. We will provide employment to the local people. Greenbelt will be developed in an area of 1.08 Acres.
20.	Sri Sanku Sreenivasulu, Sate General Secretary, D.No: 4-54, Near Central Bank of India, Vikas Nagar, Dilsukhnagar, Hyderabad-500060	He welcomed the project. Asked the Project proponent to provide employment to the local people, provide common infrastructure measures like Drinking water, Education and Health to the local villages. Provide Drinking water facility to the local villages.	Thanked him for his support.  We will provide maximum employment to the local people.  RO water plants will be established in the Jayanthipuram village and other nearby villages to provide drinking water facilities to the villagers.
21.	Sri P. Krishnaiah, Paryavarana Parirakshana Samithi, NGO, Office:9-7/1, Road No:7 A, Dwarakapuram, Dilsukhnagar, Hyderabad	They welcomed the project and suggested not to affect the surrounding villages and people by their production operations and also they have to follow central pollution rules and guidelines.  They stated that they are supporting on behalf of NGO members to give permission to the project.	Thanked him for his support. We will take all necessary measures to control the pollution and we will follow the relevant rules and guidelines.

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## బారతీయ జనతా పాల్టి హుపాలేనగర్ నియోజకవర్గం



### BARATIYA JANATA PARTY **HUZURNAGAR CONSTITUENCY**

మేళ్ళచెర్ను గ్రామం & మం., సూర్యాపేట జిల్లా. తెలంగాణ

## తోట హాస్బేన్ నాయుడు

Cell: 8247539242

: 9666233410

A.M.I.E., M.B.A,

ప్రధానమంత్రి మనరల్ కమిటి హుజార్నగర్ నియోజకవర్గ కన్సీనర్

Date-19-12-17,

కేంద్రప్రభుత్వ అభికృద్ధి కార్యక్రమాల ప్రచార కన్వీసర్

జాతీయ పర్యావరణ, గనులు, భూగర్జ జలాల పలిరక్షణ సంస్థ చైర్మన్ ( N G 0 1983)

భాంక్స్ క్లిక్ కి క్లో జిల్లు ట్రికింట్ కాంట్ పంటిక్ట్ టంర్ అల్స్ స్ట్రామునకు పై - ಅರು ಸರಕು ಹಾರಿ ಸಮನ್ಯಾರವಾಟ

ರಿಷ ೧ರು ಶು −ೆ೦%- ದ/ ತರ - 12 - 2017 ಕೊ ಎಎ ೯೧ ಕೆ) ಮೆ ಒಡು - ಜಗ್ಗ ೧೮೮) ಪ್ರೇ ಕೂ ಇರಾಂಡ್ನ ಹೊಳು (ಅಭಾಕ್ಕಾರ್ ಕೂರ್ನ್ನ ಎಂಕ್ಸ್ಟ್ ಪಂಕ್ಲ್ಯಾ ರ್ಲ್ಫ್ ವರ ಟ (ಸಬಾಭ (ಎಂ೦೦೦ ಸೆತರ ಆಕು ಸಂಪೂರ್ಣ ಮಾಧ್ಯ ಆ೦ किल्लं) ना द्वारा क्रिक्टी स्पर्व क्षित्र क्रिक्ट क्षित्र क्रिक्ट क्षित्र क्षत्र क्षित्र क्षित्र क्षित्र क्षित क्षित्र क्षित्र क्षित्र क्षित ಋ.

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೨೦೦೦ ಕಂಟಗೊ-್ಲಿಂ ಕಂಚನು ಅವುಕ್ತಿಸಮಯನ್ನು ಜನಂತೆ ಕಾಯುತ್ತಾ ಸ್ರ್ರಕರಿಕ್ಷಮುಲನು ನಿಯಂ ಆತಿಂದುಟಿಕು (1) ಹಿತಪಾಲ ವೆಎಸ್ಟ್ರಿ あり 智の配のの 変で(3) 野盛(1) 20 m(2) まるに (c) ありか 生だれ &xx ಉಗು ಹಿಂಬ್ ಕ್ರಮ ಕಂಪ ಹರಿಯು ತಾಲಪ್ರಂ ಆಗಿ Coz ಸು ನಿರ್ವಿಕಿಯ ಮುಚ್ಚೆ ಸ್ತ್ರಾಮ ಹಾಯು ತಾಖಪ್ರತಿಯಾಗೆ ಪ್ರಭಿ ಹಾಸನೆಯ ನಿರ್ವಹರ್ಧಿ ಮು ಹೆ ಹಿ ರ್ಷವಾಗ & \$6 ಸ್ಟ್ರಾಯಾನಿ ಮಿರ್ಡು ತುಂಥ ಹೆಸ್ತಾಯ

(PTO)

## ျှစ်တာ జనతా పాల్ల

*ාංజార్*నగర్ నియోజకవర్గం



### BARATIYA JANATA PARTY **HUZURNAGAR CONSTITUENCY**

మేళ్ళచెర్ను గ్రామం & మం., సూర్యాపేట జిల్ల. తెలంగాణ

## తోట హాస్పేన్ నాయుడు

A.M.I.E., M.B.A,

ప్రధానమంత్రి మినరల్ కమిటి హుజార్చగర్ నియాజకవర్గ కన్వీనర్ కేంద్రప్రభుత్వ అభివృద్ధి కార్యక్రమాల ప్రచార కన్పీనర్ జాతీయ పర్యావరణ, గనులు, భూగర్థ జలాల పలరక్షణ సంస్థ చైర్మన్ ( NGOI983 ) Cell: 8247539242

: 9666233410

Date 19-12-17

ಕ್ಟು ಇದಾಶ್ (ಶಾಕುನ್ನು ಕ್ಷರು) ಶ್ರೀತ್ರಾಹಿ ೧೯೧೯ ಭಾಗಿ υνογοο (Water Treatment Plant) 300 - 32 ώο (3 మ) రీంటర్గట్ ఆవసరములు - వాంరిట్ ప్రవములు పెండుట్ కు యు *ಕು* ಹೆಯಾರಿ ೧ ೦ ಬಳ್ಳ ಲಕು

శ్రహ్హారలడ్స్ ము (ధ్విన్రాలడ్సం) ఉంకట్టుట్ను ఈంక్రమనములు ఎంచిగాం పెంచడం ందుంకకములు ర్మిని (ప్రమాంధిని 6508 (న్లోబ్లుల్స్) మింబు దము ర ఈ రంథు భాశక ఆ (ప్రభు ఆక్టిం ఎక్టే కంబున 65 DBe ను ఉృగా కార్యాత్సర్ లో బ్రీ రింగుల డేవలెనుం.

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### ంరతియు జసతా వి పంజుర్నగర్ నియోజకవర్గం



# HUZURNAGAR CONSTITUENCY

మేళ్ళచౌర్కు గ్రామం & మం., సూర్యాపేట జల్లా. తెలంగాణ

తోట హాస్బేన్ నాయుడు

Cell: 8247539242

: 9666233410

Date - 19-12-17

ప్రధానమంత్రి మనరల్ కమిటి హుజార్నగర్ నియోజకవర్గ కన్నీనర్ కేంద్రప్రభుత్వ అధివృద్ధి కార్యక్రమాల ప్రచార కన్పిపర్

వాతీయ పర్యావరణ, గనులు, భూగర్ధ జలాల పరిరక్షణ సంస్థ చైర్హన్  $\left( N40.1.9.83 \right)$ 

ಸಮಗ್ದ ಯರ್ಕಾಸುವ್ರಮು ಏರೀತಕು ಎರಂಗಾ ಅಮಿಲ್ಲವು ಗರ್ಲಿಯನ ಇಟ್ಟ (ಕರವಣಿಲ್) జ్స్ మాంట వారం చూర్చా వరల (పజా శా (పాంయ నే కథలకు సంపూర్ణ మధ్య కు తెలుదు) -ಹಿಯಾದು ಆ10 ಆಗಳನ ರಮಮಾರಾಟ ೮೪೦ಬಾಲಾ

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#### DANDA KONDAMMA CHARTABLE TRUST

### T. SUNKESULA (VILLAGE & POST), YERRAGUNTLA MANDAL,

Y.S.R. DISTRICT KADAPA,

CORRESPONDENT RESIDENCE ADDRESS : H NO : 5-6-329/1, SWAPNA MADHAVI ARACADE VAIDEHINAGAR,

VANASTMALIPURAM, RANGAREDDY DIST HYD -500070

CELL NO: 9491883019

**REG NO: BOOK IV NO: 06/2011** 

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A Select Even report of the grant of the selection of the

J. M.N. Roser. Gl. 9968917127 From

Ravi Kumar Nandipati, Environment Volunteer & Senior Journalist 6-197/24, Laxma reddy Palem, Hayat Nagar, Hyderabad

Cell: 089787 42750

Mail: nandipatiravikumar@gmail.com.

To, The Regional Officer, AndhraPradesh Pollution Control Board, Vijayawada.

AndhraPradesh State

Sub: Welcoming the "Sharvani Labs Pvt Limt "Jayanthipuram Village,

Jaggayapet (M), Krishna Dist. AndhraPradesh State.

Ref: Environmental public hearing meeting on 22.12.2017.

Sir,

I Nandipati Ravikumar Environment Volunteer & Senior Journalist, welcoming "Sharvani Labs Pvt Limt" Jayanthipuram Village, Jaggayapet (M), Krishna Dist. AndhraPradesh state government is supporting new and upcoming industries, and giving so many incentives, and also setup special industrial complexes it helps the "AndhraPradesh State Government Financial growth". In AndhraPradesh, with this project local area unemployed youth get job appuratunites and it helps State financial growth with the help of and duties. We congratulate the management and the consultant for their EIA report.

We are recommending some works with help of community social responsibility funds.

- 1. Special skills training programmes for local un-employment youth.
- 2. Special health campus for rural villages.
- Take much care about Greenbelt, it helps reducing the noise pollution
   Hence we are request to take necessary steps to sanction central Govt.
   Environment, forest, weather change department permissions.

Thanking you Sir,

J. Revision,

( RAVIKUMAR NANDIPATI )

## AASHRAYA RURAL DEVELOPMENT SOCIETY

KAMBADUR - ANANTAPUR Dist. ( + +>) 

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ఇంటి నెం. 11-262, నాయుడుపేట వీధి, **మేక్కదెర్పు - 508 &46.** సూర్యాపేట జిల్లా, తెలంగాణ.

**ಸಲ್ಟು ವಿಂಕಟೆ ಕ್ಯ**ರ್ಗ್ಲ B.A.,

Ja 22-12-2017

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చేతు కుండలం. అమంటి ప్రభావంగాకుంటి కనిష్ఠాశుల్లు జగ్గమ్స్ట్ లాజ్స్ట్ పైలెచిటెడ్ వారికెన్ నెర్మేనెం - 109 గల చాది ప్రజాబి అపాచు సేకేకాకాకు. సంప్పిద్ధ మర్వట్లు కెటాంము తేముచుగున్నాయి. మరిత్రము ఎర్మాటు కెపిస్ట్ అదువాకు సంప్పర్థ

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cell 8340971486

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Chief Functionary: S.VENKATESHWARLU. PH: 92 92 50 53 50

Date: 22-12-2017.

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SARVANI LABS PUT LTD. Sy No: 109 Jayan THI puram (V) Taggayyapet (10) Khishmaler) AP.

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AIR POLLUTION. NOISE POLLUTION. SOLID WASTE, LIQUID EFFLUENTS.

#### Queries and Comments on EIA

for

#### Sarvani Labs Pvt Ltd, Jayanthipuram

M/s\_Sarvani Labs are proposing a new pharmaceuticals plant near Janthipuram, Krishna district. Draft REIA is prepared by Rightsource Industrial Solutions Pvt Ltd, Hyderabad. As usual this EIA also has several shortcomings and errors including copy-paste. It is unfortunate that our regulatory system is incapable of checking unethical practices and improve the quality of the EIA reports. Public hearing is scheduled on 22 December 2017 at the plant premises.

I am listing below some mistakes and manipulations of data while preparing the draft EIA report. Based on these observations a list of questions are raised for reply by the proponent in writing.

Coal: Coal consumption of 7.5 TPD for a 3 TPH steam boiler is absurd. For Indian coal with 47% ash content coal required for 1 TPH boiler is about 4.8 TPD. So the coal requirement should be 4.8 x 3 = 14.4 TPD.

#### 2. Emissions:

Data given in table 2-10 is used as basis

#### Sulphur Dioxide:

Boiler capacity : 3.0 TPH

Coal consumption : 7.5 TPD

Sulphur Content of coal (%) : 0.5

Sulphur dioxide generated : 7.5 x  $1000 \times 0.5 / 100 \times 64/32 \times 1/24 \times 1000 / 3600$ 

 $: 75/(24 \times 3.6) = 0.868 \text{ g/s}$ 

Diameter of the stack : 0.5 m

Cross sectional Area of stack :  $3.14 \times 0.5^2/4 = 0.19625 \text{ m}^2$ 

Flue gas velocity in the stack : 16 m/s

Volumetric flow of flue gas  $: 0.19625 \times 16 = 3.14 \text{ m}^3/\text{s}$ 

Temperature of flue gas : 180 C = 273 + 180 = 453 K

Flue gas flow rate at STP :  $3.14 \times 273 / 453 = 1.89 \text{ m}^3/\text{s}$ 

Sulphur dioxide in flue gas

 $: 1.89 \text{ m}^3/\text{s} \times 110 \text{ mg/Nm}^3 \times 1/1000 \text{ g/mg}$ 

= 0.208 g/s

Based on proper estimate of coal consumption of 14.4 TPD

Sulphur dioxide generated

: 14.4 x 10<del>00</del> x 0.5 / 1<del>00</del> x 64/32 x 1/24 x

(1000/3600)

: 144/(24 x 3.6)

: 1.667 g/s

Sulphur dioxide rate in flue gas taken is 1.2 g/s (Table 2-10). How this number is arrived at is unknown. It is 28% less than the probable emission rate.

The emission concentrations of SO<sub>2</sub> and NOx taken to calculate the emission rate of these gases from the stack have no basis. Calculating the flue gas flow rate based on an assumed stack gas velocity is wrong. Flue gas flow rate should be arrived at from combustion calculations for coal. Concentrations of SO<sub>2</sub> and NOx taken as 110 mg/Nm³ and 120 mg/Nm³ as shown in Table 2.10 (Page 44) cannot be attained without incorporating processes such as FGD and SCR for removal of these gases.

#### Solvent Loss:

"The industry will take measures for reduction of fugitive emissions by providing Chilled brine circulation to the condensers, which ensures the recovery of 95% and also controlled by closed operations and handling methods." (Page 230)

"The above management will results in recovery of solvent more than or equal to 95%." (Page 260)

But the loss shown in material balances presented in chapter 2 and others is a uniform 2% for all solvents. This is false. Losses of acetone and Toluene cannot be same as their volatilities vary widely.

Jimmy Peress, "Estimate storage tank emissions" Chemical Engineering Progress, p44-45, Aug 2001 presents method of estimation of solvent losses from storage tanks and presents the results for several solvents at ambient temperature. From the data below it is clear that the extent of loss of solvents differ widely. There are printing errors in the Notes below the table. Temperatures within the brackets are C and not F. These losses are at temperature less than 13 C. But at the plant site the temperatures could be as high as 40 C or more in summer.

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		Toble.	Comparison of a	horcut procedur	e mel CPA meth	áil.			
Dryanie Liquid	EPA Method			Simplified Malliad			Discrepancy		
	Working Losses, Myr	Breathing Losses, Ih/yı	Total Louisa, ihiyi	Working Losses, Ib/yr	Breathing Lauses, th/yr	Total Losses (b/yr	Working Losses	Brenthing Losses	Total Lusses
Toluane	603.9	319.7	923 6	584.3	317.2	901.6	-32%	-0.8%	-2.4°°
c-Xylene	147.1	<b>65</b> 1	232.2	141 2	75.7	217.9	-4.0%	-9.9%	-62%
Methanol	915.0	413.8	1,329.7	885.4	461.0	1,38G,4	-3.3%	+19.2%	+2.6%
Curnens	113.9	65.5	177.4	107.1	58.2	165.3	-43%	-111%	-6.6%
Acatona	3,443.7	1,338.3	4,762.0	3,300.4	1.025.7	5,180.1	-24%	+36.4%	+8.5%
n -Dichlorobenzene	£2.3	25 1	67 4	40,4	22.0	62.4	-4.5%	-12.4%	-7.4%

#### Notes:

- 1. Storage tank is 40 ft high x 20 ft dia., and on average is half full.
- 2. Total annual throughput is 939,967 gal/yr (125,664 ft<sup>3</sup>/yr).
- 3. Daily average temperature is 54.55°F (12.53°F).
- 4. Daily average temperature range is 15.3°F (8.5°F).

Solvent losses have an impact on occupational exposure to workers in terms of workroom concentrations in the plant. Draft REIA report has not presented any data on occupational exposure from workroom concentrations. Especially thionyl chloride has a STEL value of 1 ppm. Means exposure at 1 ppm for 15 minutes could be fatal.

#### 3. Chemical Exposure Limits:

Chemical Exposure Limit values presented in Table 7.7 Page 193 are outdated and far above the actual limits. Data collected from authentic sources is presented to show the errors.

Chemical	Data Presented in Table 7.7			ACGIH 2005			
· '	ACGIH TLV	OSHA	NIOSH IDLH	ACGIH TLV	OSHA PEL	NIOSH	
		PEL	<b>]</b>			IDLH•	
Acetic Anhydride	5	5	1000	5	5	200	
Acetone	750	1000	20000	250	1000	2500	
Carbon	10	20	500	1	20	500	
disulphide							
Chiorine	i	1	10	0.5	1	10	
Ethyl	400	400	10000	400	400	2000	
Acetate	]						
Iodine	0.1	0.1	2	0.01	0.1	. 2	
Methanol	200	200	6000	200	200	6000	
Methylene Chloride	50	500	5000	50	25*	2300	
Monochloro benzene <sup>s</sup>	10	75	2400	10	75	1000	
Nitric Acid	2	2	100	2	2	25	

Phosphorous	0.2	0.2	25	0.2	0.5	25
Trichloride		i	<u></u>			
Toluene	50	200	2000	20	200	500

· Ceiling Limit Value

@ NIOSH Pocket Guide 2007

# California OSHA PEL - Latest data on OSHA website does not give any PEL values for MDC. <a href="https://www.osha.gov/dsg/annotated-pels/tablez-2.html">https://www.osha.gov/dsg/annotated-pels/tablez-2.html</a>

\$ MCB is a class 2B carcinogen

OSHA: PELs are outdated as they are not being updated.

NIOSH: "no detectable exposure levels for proven carcinogenic substances"

**4. Air Quality:** Only two sources of pollution are considered for air quality deterioration. One is the 3 TPH boiler and the other 320 KVA generator. From the evidence presented in sections 1 & 2 above, it is clear that the quantity of pollutants is much below the actual and erroneous. Air quality change predicted from false data cannot present the correct impacts.

| Application | Month | Month | Buy | Phile |

Above air quality data is from the EIA report for VBC Fertilizers and Chemicals measured during December 2014 – February 2015 at jayanthipuram. Sarvani labs is adjacent to VBC project site. This project obtained EC from MoEF and is in the pipeline. In such cases the EIA for Sarvani Labs should include proposed emissions from this plant also and all other plants that are in progress to come out with a

cumulative impact assessment. It is another matter that VBC produced all false data for emissions and yet managed to get EC based on a copy pasted EIA report.

TABLE 3.12: AMBIENT AIR QUALITY, STATION: JAYANTHIPURAM (A5)

Date	Week	PM 10	PM 2.5	SO₂	NOx	со	NH3	voc
06.03.2017	1	55.29	21.34	11.34	15.24	0.42	12.94	BOL
07.03.2017	1	54.61	20.68	11.29	15.37	0.48	13.64	8DL
13.03.2017	2	55.08	21.09	10.35	15.29	0.39	14.09	BDL
14.03,2017	2	54.91	22.37	10.57	14.07	0.37	15.27	BDL
20.03.2017	3	55.03	22.91	11.06	15.38	0.50	14.83	BDL
21:03.2017	3	55.67	21.58	11.38	15.6	0.42	14.67	BDL
26.03.2017	4	56.81	21.3	10.94	14.92	0.48	15.08	BDL
27.03.2017	4	57.03	21.64	10.58	14,51	0.51	15.34	BDL
03.04.2017	5	56.91	22.14	11.49	15.35	0.48	16.01	BDL
04.04.2017	5	57.04	22.08	11.08	15.62	0.43	15.84	BDL
10.04.2017	6	57,38	21.67	11.34	14.98	0.47	15.27	BDL
11.04.2017	6	56.19	22.06	10.69	15.06	0.42	15.83	BDL
17.04.2017	7	56.82	23.54	10.48	15.27	0.51	14.98	BOL
18.04.2017	7	56.37	22.59	10.54	14.92	0.38	14.76	BDL
24.04.2017	8	55.99	24,16	11,37	15.04	0.39	15.04	BDL
25.04.2017	8	56.28	23.51	11.06	14.68	0.42	14.28	BOL
02.05.2017	9	55.49	22.41	11.59	15.73	0.41	14.37	BDL
03.05.2017	9	57.34	22.81	11.08	15.28	0.38	15.06	BDL
08.05.2017	10	56.60	23.30	11.50	14.60	0.55	14.50	BDL
09.05.2017	10	57.90	24.50	12.30	15.30	0.41	15.30	BDL
12.05.2017	11	58.30	21.60	11.70	16.50	0.52	14.90	BDL
13.05.2017	11	59.10	22.80	12.50	15.80	0.48	15.60	BDL
18.05.2017	12	58.80	23.60	13,10	17.40	0.39	16.20	BDL
19.05.2017	12	56.10	24.10	12.00	16.60	0.42	15.80	BDL
Minimum		54.61	20,68	10.35	14.07	0.37	12,94	0.00
Maximum 59		59.10	24.50	13.10	17.40	0.55_	16.20	0.00
Average			22.49	11.31	15.35	0.44	14.98	0.00
98 <sup>th</sup> Percent	98 <sup>th</sup> Percentile		24.34	12.82	17.03	0.54	16.11	0.00

It may be noted that concentrations of pollutants are higher in winter months compared to summer due to changes in mixing heights with season. The air quality for each of the pollutants measured in summer of 2017 are close to concentrations measured in winter of 2014-15. If the ground level incremental concentrations are calculated including the emissions from the VBC plant also then NAAQS will be exceeded. Incremental GLCs computed for VBC with heavily manipulated emission rates gave considerable incremental values. The table with those values from their EIA is reproduced below.

Table 4.3 Overall Scenario of GLCs predictions

	Maximum Incremental Levels ( · g/m²)				
Description	PM	\$O <sub>2</sub>	NO <sub>*</sub>		
Predicted maximum GLCs values	6,68	24.2	5 18		
Maximum concentrations observed during Baseline study	7100	15.50	21 60		
Resultant concentrations	73.41	62.4	32.42		

One can clearly notice the error in calculation of resultant concentrations. Simple additions are not done properly. The consultants get away with any nonsense because the regulatory system is sick

Once the VBC plant comes on stream, the air quality in the area could exceed NAAQS to begin with in winter and then throughout the year.

#### Questions:

- 1. AP state is building a new capital Amaravathi downstream of the industrial hub near Jaggayyapeta. All the effluents from the industries are likely to end up in Krishna River and impact drinking water quality for the people of the capital city and other cities nearby. It is a repetition of the mistake committed in Hyderabad. Fate of Musi and other water bodies is well known. ZLD has proven to be a tool to beat regulation and has not eliminated pollution. ZLD being very expensive it cuts into the profits of the company. ZLDs are complex systems and their operation is difficult and takes intensive attention. With lax and incompetent regulation groundwater everywhere the pharma industries are located has been poisoned. Who is designing and supplying the ZLD system? What is their expertise in this field?
- Proponent to give details on how they calculated the Indian coal requirement for a 3 TPH boller and arrived at 7.5 TPD?
- Give details on obtaining concentration values of 110 mg/Nm³ for SO, and 120 mg/Nm³ for NO, in the stack gas.
- 4. As demonstrated in section 2 above the emission rates for SO, are incorrect. Proponent to provide details of calculations for emission rates of SO<sub>2</sub> and NO<sub>2</sub> and reproduce the numbers given in Table 2.10.
- 5. What is the validity of incremental GLC values obtained from air quality modeling when the inputs for pollutant flow rates are erroneous?
- 6. Fugitive emissions from the storages and process operations are not quantified and presented. Losses of solvents shown in Chapter 2 are mere assumptions that have no basis. What are the actual losses for all the solvents? And where do they end up?

7. There is hardly any EIA report that has no copy paste content from other sources. This report too has considerable plagiarism. How does the proponent justify unethical practices in preparing documents whose quality has consequences on the people? For example entire section 4.1 Introduction is copy pasted from other reports.

8. Groundwater is proposed for all uses in the plant with the claim that there is adequate quantity. Groundwater quality at the project site is not presented in the EIA. GW1 in Table 3.16 is shown as at a distance of 5.2 km from the project site. How does a sample taken at a distance of 5.2 km from the site represent the groundwater quality at the project site? This sample has 560

mg/l of TDS.

Dr K Babu Rao Chief Scientist (Retd)
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### **SRI VAMSHI ARTS ACADEMY**

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Govt. Regd. No. 3575/95.

Ref:

Date: 22= 10=2017

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PRESIDENT /
Sri Vainshi Arts Academy
(MijiRamannapet-508 133, Diet; Niu

# ORGANISATION FOR ANTI-POLLUTION (ECOFAP)

Regd. No. 1969-2016 Office: H.No.7-134/2, Sri Nagar Colony, (VI): Kunloor, (M): Abdullapurmet, R.R.Dist.

RINGU RAMBABU

State President

Cell: 9666987484

Date: 22-12-17

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#### **CHEPURI RAJU**

State Secretary, Telangana Cell : 9030699836 Date: 22 12 2017

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## PARYAVARANA PARIRAKSHANA SAMITHI (NGO)

#

(REGD. NO. 626/2010)

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Gen. Secretary : • P.DURGA

Joint Secretary : M. SHOBHAN YADAV

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K.RAVI RAJ
M.RAMULU
K.JAI RAJ
T. DHAN RAJ
M. MUKESH
R. RAVINDER

Date: 22/12/2017

To

The Envirolement Engineer
Krishne (distict) A.P.

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#### CHEYUTHA RURAL DEVELOPMENT SOCIETY

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Director: A.Sudarshan

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### SRI RAMA GOO SAMRAKSHANA SHALA

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Govindu Kumara Swamy B.Com President P-22-12-2017

भिक्रिक इ००६० २००६ (कान्सिकी

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### DALITHA BAHUJANA

Journalist's Association

Reg.No. 378

D.No. 4-54, Near Central Bank of India, Vikas Nagar, Dilsukhnagar, Hyderabad-500 060. Cell . 9440569092

#### SANKU SREENIVASULU

B.A., CL.B

Date 22-12-2017

State General Secretary

2000-3/2012 DOG HOUR BY SOURS !



MONDAY 20.1007



#### ANDHRA PRADESH POLLUTION CONTROL BOARD

REGIONAL OF ICL P. OT NO. 47 Opp. SBI Sti Kanakadarga Officer's Colony. VLJAYAWADA-5

#### NOTICE OF ENVIRONMENTAL PUBLIC HEARING

in accordance with the Notification No. S.O.1533 dated 14th September, 2006 and the circulars issued thereof of the Ministry of Environment, Forest & Climat Change (MOEF&CC), Government of India, the A.P. Pollution Control Soard hereby issue public hearing notice for proposed to establish an industry for manufacture of bulk drugs and intermediales with a production capacity of 9000 kg/month by M/s. Sarvani Labs Pvt. Ltd., located at Sy.No.109, Jayanthipurem (V), Jaggaiahpet (M), Krishha District, Andhra Pradesh.

tion of the Project/Extent  e of the Authorized Person to	Sy. No. 109, Jeyanthipuram (V), Jaggalahpet (M), Krishna District, Andhra Pradesh Extent : 2.93 Acres K. Sriniyasa Raju
e of the Authorized Person to	K. Srinivasa Raju
entacted with address and e No.	P.No.406, E-Block, Vertax Pride Apartments, Jayabharath Nagar, Nizampat Road, Kukatpally, Hyderabad-85 Ph: 9290055441, 040-48509135
ct Cost	Rs. 6.36 crores
of Activity	Bulk Drugs and Intermediates
& Time	22-12-2017, 3.00pm Jayanthipuram (V), Jaggalahpet (M), Krishna District.
	& Time e of Public Hearing

- Places of availability of Executive Summary & EIA Report, which are kept open for pu
- 1. Office of the District Collector Mechilipstnam, Krishna District.
- 2. Office of the Chief Executive Officer, Zilleparished, Machilipatnem, Krishna District.
- 3. Office of the General Manager, District Industries Center, Vijeyewada.
- 4. Office of the Member Secretary, APPCB, Head Office: Kesturibalpet, Chalemalaveri Street, Vijayawada
- Office of the Principal Secretary, EFS&T Department, A.P. Secretariet, Ameravath
- Office of the Joint Chief Environmental Engineer, APPCB, Zonaf Office, Plot No.41, Opp. S8H, Gurunanal Road, Sri Kanakadurga Officer's Colony, Vijayawada

- Road, Sri Kanakadurga Officer's Colony, Vijayaweda
  Grampencheyst Officer of 1)Ohermavarampedu Thanda, 2)Chilekelku, 3)Vededri, 4)Jayanthipuram,
  5)Gowravaram, 6)Pochampalli, 7)Kavuthavari Agraharam of Jaggalahpet (M), Kriahna District.
  Office of the Tahalidar, Jaggalahpet, Jaggalahpet Mandal, Kriahna Dist.
  Municipal Office, Jaggalahpet, Jaggalahpet Mandal, Kriahna Dist.
  Office of the Environmantal Engineer, APPCB, Regional Office, Plot No.41, Opp. SB), Gurunanek Road, Sri
  Kanakadurga Officer's Colony, Vijayawada.

In accordance with MOEF&CC Notitication No. S.O. 1533, serial No.7 (I)stage (III) (ii) a & b, dt.14 09-2006, suggestions, views, comments and objections of the public if any on the above project are invited on or before 30 days. All the persons can also make written suggestions to the under signed officer of the Andhra Pradesh Poliution Control Board. All the persons can participate in public hearing on the date and venue specified above.

Date: 19-11-2017 Place: Vijayawada

**ENVIRONMENTAL ENGINEER** A.P. Pollution Control Soard, Vijayawada

#### ಆಂಧ್ರಪ್ರದೆನ್ ಕಾಲುಷ್ಟ ಸಿಯಂತ್ರಣ ಮಂಹರಿ

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#### పర్యాపరణ సంబంధిత ప్రజాఖప్రాయ సీకరణ ప్రకటస

కేంద్ర పర్మావరణ, అదేవైలు మరియు వాతావరణ మార్చు మంథ్రిక్క శాఖ ప్రకటన నెం ఎస్.ఓ. 1633, తేది: 14.09.2006 అనునరించి అంధ్రప్రవిడేశ్ కాలుష్య నియంత్రణ మందరి, విజయవార వారు అందుమాలముగా తెలియకేయునది ఏమనగా మెగ్కర్స్ కర్వాతీ ల్యాట్స్ [సైవేట్ నిమిలెద్, సర్వే నెం.109, జయంతిపురం గ్రామం, జగ్గయ్యమేల మందలం, కృష్ణి తల్ల, అంధ్రప్రవేశ్ వారి ప్రశిపారిత అర్మిట్స్ మరియు అంటరేమీడియట్స్ 9000 కేజి/నిలకు ప్రొదక్షన్ చేయు కర్మాగారము నెలకొల్పుటకు పర్మావరణ ప్రజాభిస్తారు. ప్రతిపారు ప్రభిమేయ అందేచేయున్నానది. ప్రశిపారిత కార్య కలాపాల వివరములు ఈ త్రింద వివరించనమైనది. ప్రశిపారిత కార్య కలాపాల వివరములు ఈ త్రింద వివరించనమైనది.

-	activity from the part of the state		
L	కంపెనీ పేరు, టెలిఫోన్ నెం. మరియు లిరునామా	మేన్ఫర్స్ శర్వాత బ్యాక్స్ (సైవేట్ విమిశిద్ సి–1-86, సందాయితీ ఆఫీసు ఎదురుగా, సుబ్బాయిగూదెం (గ్రా). సెనుగందిభోలు (మ), శృష్టి ఉల్ల, ఆంధ్రప్రదేశ్–521190	
1	ప్రాతిశ్శ భుదేశము / విస్తీర్ణం పర్యే నెం. 109, జయంరిషరం క్రామం, జగ్గయ్మపేట మండలం, శృస్తే ఉల్ల, ఆంధ్రభుదేశ విస్తీక్షల : 2.98 ఎకరాలు		
3.	పెద్దనా అననరమైన ఎదల		
4	ప్రసిపాదిన కార్యకలాపాలను రూ. 8.88 కోట్ల కేలాయించిన పెట్టుబడి		
В.	ప్రశిపాధిత కార్యకలాపాల వినరములు		
8.	డ్రువాలిప్రాయ్ నీటిరం విర్వహించు కేదీ & నమయం : 35-15-3017, మధ్యాస్వాం 8 గంగంత ట్రవేశము, కేది మరియు సమయము (ట్రవేశము : అయంతిప్రరం గ్రామం, జగ్గయ్మమీ మందలం, శృవ్ధి ఉద్దా.		
7.	ప్రజల పరిశీలనార్థం దిగువ ప్రదేశములందు ఉంచదమైనది.		
1	జిల్ల కరెక్టరు వారి కార్యాలయం, మదిలీపట్నం, కృష్ణి జిల్లా,		
2	ముఖ్య కార్మనిక్వరాబాధికారి రారి కార్యాలయం, ఉల్ల పరిషశ్, మరిలిపట్నం, కృష్ణి ఉల్ల.		
3			
4	మెంబర్ పెక్రటలీ వారి అండ్రప్రవేశ్ కాలుష్య నియంత్రణ మండలి భవాన కార్మలయము కన్నూరికాయినీట, చలనులవారి వీధ్, విజయవార		
5	డైప్పెపల్ సెక్రకుల్ వార్ కార్యాలయం, ఇ.ఈస్.ఎస్. ఓ టీ డిపార్ట్మైంట్, ఎ.పి. స్మెకటిరియట్, అమరావతి.		
в	జాయింట్ దీథ్ ఎన్వికానెమెంటల్ ఇంజనీర్, ఉండ్రక్కదేశ్ కాలుష్ఠ నియండ్రణ నుండర్, జోనల్ కార్మాలయం, స్టాట్ నెం.41, యస్.బి.ఐ ఎదురుగా, గురువానక్ లోద్, డ్రీ కవకదుర్గా అఫీసర్స్ కాలనీ, విజయవాడ-620008.		
7	గ్రామ సంచాయితే కార్యాలయములు, 1) ధర్మనరస్వాదు తండా గ్రామం, 2) దిలశల్లు గ్రామం, 3) గౌరవరం గ్రామం, 4) వేద్యాని గ్రామం, 5) జయంతీషురం గ్రామం, 6) శాతవారి ఆగ్రహారం గ్రామం, 7) పోచంపల్లి, జగ్గర్యూపీట సందలం, శృష్టి జిల్లా,		
8	రహాల్మార్ వారి కార్యాలయం, జగ్గయ్మహేట, జగ్గయ్మామీట మండలం, కృష్ణా ఉన్నా.		
9	మువ్పవల్ కార్యాలయం, అగ్గయ్యవీట, ఆగ్గయ్యవీట మందలం, కృష్ణి జిల్లా,		

10 ఎన్సూనెమెంటల్ ఇంజరీర్, అంక్రస్తుదేశీ కాటుప్ల నియంత్రణ కుండరి, జోనల్ కార్మాలయం, ప్లేట్ నెం. 41, యస్. బి.ల ఎదురుగా, గంటరానశ్ రోడ్, జ్రీ కనకమర్లా ఆఫీసర్స్ కాలనీ, విఆయవాడ-520008. ఈ ప్రతిపాదిత కార్మకలాపాల పలన సర్వాసరణ వరంగా ఇబ్బందులనెటర్యాను వారు (కేంద్ర సర్వాసరణ, అరషల మరియు వాణావరణ మార్పుల మంత్రిత్వరాల, కారత ప్రభుత్వం వారితే జారీచేయందిన సర్మాసరణ ప్రఖాస అంచనా ప్రభటన నెం.యస్. ఒ. 1638, సిరియలే నెం. 7(1) స్టేజ్ (iii) (శ) అపికి తేది 14.08, 2009 మరియు తమవరి నవరణలను అమనరిప్పూ) కమ అభిప్రాయాలు, నూచనలు, ఇబ్బందులు, వ్యాఖ్యలు ఏవేని ఉన్న యెదల ఈ ప్రభటన మెలువదిన 30 లోజులలోపు విధిక పూర్వకంగా త్రించి సంతరంభారునకు తెలియవరచిమని కోరశమైనది లేదా మైన పేరానైకుండిన తేది, నమయము, చేదిక నెందు ప్రజాధిపూడు సేకరణ కార్యాతమములో స్వయముగా పాల్గిని తమ అభిప్రాయాలు, నూచనలు,

బృందులు, బ్యాబ్జలు శిలియతీయవచ్చును.

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వర్యావరణ ఇంతనీడ

ತೆದ : 18–11–2017 ಜ್ಞನೆಕಂ: ರಿಆಯರಾಜ





## OPINIONS EXPRESSED DURING PUBLIC HEARING AND RESPONSE FROM PROJECT PROPONENT

S.No	Name of the Person and Opinion Expressed during Public Hearing	Response from the Project Proponent
1.	Malaavath Venkateswar Naik, Jayanthipuram He welcomed the industry in Jayanthipuram village and opined that more industries should come in this area.	Thanked him for his support
2.	Islavath Srinu, Janyanthipuram Village He supported the industry coming in this village which will reduce the unemployment of the youth. He suggested tree plantation shall be taken up in the villages to reduce the pollution and it should be at the beginning of the construction of industry.	Thanked him for his support.  We will provide maximum possible employment to the local people.  We will initiate plantation program during construction phase only.
3.	B.Mallikarjuna Rao, Sarpanch, Jayanthipuram Village He welcomed the project and informed many more industries like this should come in this village which is the only solution of unemployment.	Thanked him for his support. We assure that our company will contribute for the local employment generation.
4.	Ch. Guruvayya, Jayanthipuram Village He also supported the industry coming up in this area and informed that it would helpful to the youth for employment. He referred about the CSR Activities which should be spent in the surrounding villages only. He further informed that by establishing the industries the Panchayath also get beneficiated financially. He suggested that there shall not be any odour nuisance from the proposed industry and the villagers shall not get affected due to odour.	Thanked him for his support. We assured that maximum employment will be given to the local unemployed youth. We will allocate the CSR funds to the surrounding villages. We assure that we will take all possible measures to control the odour pollution.
5.	Narikella Nagabhushana Rao, Jayanthipuram Village While welcoming the industry, he informed that employment should be given on priority to local educated youth. The industry management should be helpful to the poor people of the village.	Thanked him for his support. We assured that maximum employment will be given to the local unemployed educated youth.
6.	I. Nageswara Rao, K. Agraharam He also welcomed the industry coming up in	Thanked him for his support. We assured that maximum

	this area. He also suggested to give priority to	employment will be given to the
	local villagers for employment and	local unemployed youth.
	development activities for the surrounding	We will provide RO water plant
	villagers.	for drinking water to the
		Jayanthipuram village and to the
		villages near to the project.
	Gundla Krishna Rao, K.Agraharam	Thanked him for his support.
	While welcoming the project, informed that	We assured that maximum
	employment on priority to local youth. Further	employment will be given to the
7.	he suggested that there shall not be any	local unemployed youth and We
	pollution problems in the surrounding villages.	will take all necessary measures
		to control the pollution from
		plant operations.
	Bandla Gnana Prakash Rao, Jayanthipuram	Thanked him for his support.
	Village.	We assured that maximum
8.	While welcoming the project, he referred	employment will be given to the
	about the employment to the local educated	local unemployed educated
	youth.	youth.
	Kota Rao, Jaggaihpeta	
	He welcomed the CSR fund to be spent by the	Thanked him for his support.
	Managing Director. He suggested that	We assure that we will spend an
	spending of CSR fund should not be limited to	amount of 32 lakhs under CSR
9.	Jayanthipuram Village, it should be extended to Jaggaihpeta and other Villages.	funds to the local villages and
	to Jaggaihpeta and other Villages.  Enviromental conditions in Jaggaihpeta	we will develop avenue
	should be improved by taking of tree	plantation.
	plantation and their protection which would	
	control the temperatures in Jaggaihpeta.	
	Mullangi Rama Krishna Reddy, Sarpanch,	
	Pochampally	
	He informed that the industries in this area are	
	not extending any help to Pochampally village	
	though it is existing very close to industries.	
	He requested the industries to extend their	We assure that we will take all
4.0	help on par with the villages where the	possible measures to control the
10.	industries are located. The surrounding	pollution from the proposed
	villages shall also be developed financially.	project.
	While welcoming the project he suggested	
	that if at all any pollution problems / damage	
	to the villagers, the industry should be closed	
	accordingly a GO should be issued by the	
	Government.	
11.	Sunandha Reddy, NGO	Thanked him for his support.

	He welcomed the Project and supported for issuing of license. He suggested the following to be taken up by the Proponent.  I. Rain water harvesting structure shall be constructed for rising of ground water table.  II. He welcomed the 36% of greenbelt as proposed by the proponent. He suggested that the greenbelt shall have medicinal plants and fruit bearing trees.  III. The industry management shall impart training to local youth for skill development.  IV. Water, air and soil shall not be polluted in the surrounding villages.	We will develop rain water harvesting structures within in project site and nearby villages to conserve the ground water table.  We assure that the local educated youth would be given preference for employment for local villages. Further we will extend their guidance / help to local youth for development of skill for employment.  We assure that we will not cause any water, air and soil pollution to the surrounding areas.
12.	<ul> <li>Y.Chenna Kesava Reddy, NGO, Hyderabad.</li> <li>While welcoming the project he suggested the following.</li> <li>I. Employment shall be given to local youth only.</li> <li>II. CSR funds shall be spent to villages within 10 kms from the project site.</li> <li>III. STP and water treatment plants shall be established.</li> <li>IV. Medical camps shall be taken up in the surrounding villages.</li> </ul>	Thanked him for his support. We assure that the local educated youth will be given preference for employment. We will allocate the CSR funds to the surrounding villages and ZLD system will be installed to treat and reuse the generated effluents. We have noted your suggestion to conduct Medical camps.
13.	Dhundigala Anjayya, NGO, Nalgonda He welcomed the project and would be helpful for giving employment to the locals. He suggested that CSR funds shall be spent to the surrounding villages.	Thanked him for his support. We assured that maximum employment will be given to the local unemployed youth. We will allocate the CSR funds to the surrounding villages.
14.	Perika Krishnayya, NGO, Hyderabad He supported the project and suggested that employment shall be given on priority to local youth and CSR fund shall be spent for local poor people.	Thanked him for his support. We assured that maximum employment will be given to the local unemployed youth and we will allocate the CSR funds to the surrounding villages.
15.	Vijaya Reddy, NGO, Hyderabad He mentioned that the study on agricultural	We have prepared EIA report as per Granted ToR.

	sector, animal husbandry, human life period	Emissions from our proposed
	was not carried out in EIA report. He	project will be well within the
	suggested the above points shall also be	limits of standards.
	included in EIA. Though the chemical	
	industries adopted ZLD the pollution of Rivers	
	are not stopped. He referred about the	
	sustainable development and the industries	
	should adopt the systems accordingly. He	
	also referred about the release of pollutants	
	like SO <sub>2</sub> and NOx in huge quantities from the	
	proposed industry which would affect the	
	environment. He also referred about the CSR	
	fund allocated by the proponent which is not	
	covered under CSR GO.	
	Lavanam Chandhra Shekar, NGO, Nalgonda	Thanked him for his support.
	He welcomed the project and suggested that	We assured that maximum
16.	employment shall be given to local youth.	employment will be given to the
		local unemployed educated
		youth.