



सत्यमेव जयते

**Government of India
Ministry of Environment, Forest and Climate Change**



Date: 27/03/2024

ACKNOWLEDGEMENT

This is to acknowledge that SYMED LABS LIMITED has provided the information on PARIVESH Portal in respect of Symed Labs Limited, Unit-1 in the format attached herewith under the provisions of Para 7(ii) b of EIA Notification, 2006 and its subsequent amendment S.O.980 (E), dated 02nd March 2021.

To claim exemption from obtaining Prior Environment Clearance under the provisions of Para 7(ii) b of EIA Notification, 2006 and its subsequent amendment S.O 980 (E) dated 02nd March 2021 in respect of any increase in production capacity with or without any change in (i) raw material-mix or (ii) product-mix or (iii) quantities within products or (iv) number of products including new products falling in the same category or (v) configuration of the plant or process or (vi) operations in existing area or (vii) In areas contiguous to the existing area specified in the environmental clearance of the project, the project proponent / SPCB or UTPCC shall follow the following process:

1. The project proponent shall inform the SPCB or UTPCC, as the case may be, in specified format along with: (i) 'No increase in Pollution Load' certificate from the Environmental Auditor or reputed institutions empanelled by the SPCB or UTPCC or CPCB or Ministry; (ii) last Consent to Operate certificate for the project or activity; and (iii) online system generated acknowledgement of uploading of intimation and 'no increase in pollution load' certificate on PARIVESH Portal.
2. Based on the submission of above information, the project proponent may carry on the proposed activity as per the submitted details. However, if on verification the SPCB or UTPCC, as the case may be, holds that the change or expansion or modernization will result or has resulted in increase in pollution load, the exemption claimed under this clause shall not be valid and it shall be deemed that the project proponent was liable to obtain Prior Environmental Clearance before under taking such changes or increase, as per the clause (a) of sub-paragraph (ii) of paragraph 7 of EIA Notification, 2006 and the provisions of Environment (Protection) Act, 1986 shall apply accordingly.

Encl: Attached the Information provided by the project proponent

[CAFForm 10](#)

Application for No Increase in Pollution Load - Form-10

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Basic Details

| | | |
|--------|--|-----------------------------|
| 1. | Whether Project /Activity accorded prior EC? | Yes |
| 1.1. | Proposal No. | SEIAA/TS/MDK-29/2015 |
| 1.2. | Name of Project | Symed Labs Limited (Unit-1) |
| 1.3. | Whether the Project Activity attracts the provisions under | 7(ii) (b) |
| 1.3.1. | Category | B1 |
| 1.3.2. | Whether Project/Activity falls in the category of Processing or Production or Manufacturing Sectors? | Yes |
| 1.3.3. | Whether multiple items (Components) as per the notification involved in the proposal? | No |

1.3.4. Item No. as per schedule to EIA Notification, 2006 for Minor Activity

| | | | |
|----------|---|---|---|
| 1.3.4.1. | Item No. as per schedule to EIA Notification, 2006 for Major Activity | 5(f) Synthetic organic chemicals industry | Bulk drugs and intermediates (located outside the notified industrial area) |
| 1.3.4.2. | Capacity | 260.04 | TPA |

| Activity | Sub Activity | Capacity | Unit |
|---|---|----------|------|
| 5(f) Synthetic organic chemicals industry | Bulk drugs and intermediates (located outside the notified industrial area) | 259.2 | TPA |

| | | |
|----------|---|----|
| 1.3.4.3. | Whether Project/Activity falls in 'B2' Category | No |
|----------|---|----|

| | | |
|----|---|-----|
| 2. | Whether the project proposed to be located in the Notified industrial area? | Yes |
|----|---|-----|

| | |
|------|-----------------|
| 2.1. | industrial_area |
|------|-----------------|

| | |
|---|---|
| Type of Industrial Area | |
| 2.2. Name of the Notified Industrial Area | IDA-Bonthapalli |
| 2.3. Whether the Industrial Area notified? | After 14th September, 2006 |
| 2.3.1. Notification copy of Industrial area in PDF | IDA Notification_ Bonthapally.pdf Preview |
| 2.4. Whether Prior Environmental Clearance available for Notified Industrial Area? | No |

3. Details of Consent under Air (P&CP) Act, 1981 & Water (P&CP) Act, 1974

| Consent No/Application No | Date | Valid Up to | Copy of Consent order |
|---------------------------|------------|-------------|-----------------------|
| 210822799010 | 02/07/2021 | 30/03/2025 | CFO copy.pdf Preview |

4. Details of Authorization under Hazardous & Other Waste Management Rules, 2016 and subsequent amendment

| Authorization No./ Application No | Date | Valid Up to | Copy of Authorization order |
|-----------------------------------|------------|-------------|-----------------------------|
| 210822799010 | 02/07/2021 | 30/03/2025 | CFO copy.pdf Preview |

Product Details

1. Details of products & by-products including changes in product mix

| List of products/by-products permitted under EC / CTO with CAS Number | Quantity permitted under EC / CTO | Unit | List of products/by-products proposed under clause 7(ii)(b) with CAS Number | Quantity proposed under clause 7(ii)(b) | Unit | Remarks if any |
|---|-----------------------------------|------|---|---|------|--|
| Carvedilol | 3.67 | TPM | Carvedilol | 0 | TPM | Dropping in CPM |
| Levosulpiride | 0.50 | TPM | Levosulpiride | 0 | TPM | Dropping after CPM |
| Tizanidine Hydrochloride | 0.05 | TPM | Tizanidine Hydrochloride | 0.05 | TPM | No change in CPM |
| Fluconazole | 1.60 | TPM | Fluconazole | 1.20 | TPM | Continue after CPM by decreasing the production capacity |
| Thalidomide | 0.05 | TPM | Thalidomide | 0.05 | TPM | No change in CPM |
| Ritonavir | 0 | TPM | Ritonavir | 0.25 | TPM | Proposed in CPM |
| Mosapride Citrate Dihydrate | 0.20 | TPM | Mosapride Citrate Dihydrate | 0 | TPM | Dropping after CPM |

| List of products/by-products permitted under EC / CTO with CAS Number | Quantity permitted under EC / CTO | Unit | List of products/by-products proposed under clause 7(ii)(b) with CAS Number | Quantity proposed under clause 7(ii)(b) | Unit | Remarks if any |
|---|-----------------------------------|------|---|---|------|--|
| Iron sorbitol citric acid dextrin complex | 0.10 | TPM | Iron sorbitol citric acid dextrin complex | 0.10 | TPM | No change after CPM |
| Ketorolac tromethamine | 2.00 | TPM | Ketorolac tromethamine | 0 | TPM | Dropping after CPM |
| Retigabine | 0.04 | TPM | Retigabine | 0.04 | TPM | Continue after CPM |
| Prucalopride | 0 | TPM | Prucalopride | 0.015 | TPM | Proposed in CPM |
| Vortioxetine hydrobromide | 0 | TPM | Vortioxetine hydrobromide | 0.25 | TPM | Proposed in CPM |
| Hydroxychloroquine sulfate | 0 | TPM | Hydroxychloroquine sulfate | 5.00 | TPM | Proposed in CPM |
| Levocetirizine Dihydrochloride | 1.00 | TPM | Levocetirizine Dihydrochloride | 1.00 | TPM | No change after CPM |
| Pregabalin | 1.50 | TPM | Pregabalin | 0 | TPM | Dropping after CPM |
| Tapentadol Phosphate | 0 | TPM | Tapentadol Phosphate | 0.75 | TPM | Proposed in CPM |
| Adiphenine Hydrochloride | 0 | TPM | Adiphenine Hydrochloride | 0.10 | TPM | Proposed in CPM |
| Itopride Hydrochloride | 3.90 | TPM | Itopride Hydrochloride | 3.90 | TPM | No change after CPM |
| Rivaroxaban | 0.45 | TPM | Rivaroxaban | 0.60 | TPM | Continue after CPM by increasing the production capacity |
| Topiramate | 0.45 | TPM | Topiramate | 0.45 | TPM | No change in CPM |
| Idrocilamide | 0 | TPM | Idrocilamide | 0.25 | TPM | Proposed in CPM |
| Ezetimibe | 0 | TPM | Ezetimibe | 1.50 | TPM | Proposed in CPM |
| Validation and R & D products | 0 | TPM | Validation and R & D products | 0.03 | TPM | Proposed in CPM |
| Bilastine | 0 | TPM | Bilastine | 0.50 | TPM | Proposed in CPM |
| Tapentadol hydrochloride | 0 | TPM | Tapentadol hydrochloride | 0.042 | TPM | Proposed in CPM |
| Linezolid | 9.00 | TPM | Linezolid | 9.00 | TPM | No change after CPM |
| Modafinil | 0 | TPM | Modafinil | 0.416 | TPM | Proposed in CPM |
| Ondansetron hydrochloride dihydrate | 0.075 | TPM | Ondansetron hydrochloride dihydrate | 0.075 | TPM | No change in CPM |
| Stanozolol | 0.04 | TPM | Stanozolol | 0.04 | TPM | No change in CPM |
| Tofisopam | 0.06 | TPM | Tofisopam | 0.25 | TPM | Continue after CPM by increasing the |

| List of products/by-products permitted under EC / CTO with CAS Number | Quantity permitted under EC / CTO | Unit | List of products/by-products proposed under clause 7(ii)(b) with CAS Number | Quantity proposed under clause 7(ii)(b) | Unit | Remarks if any |
|---|-----------------------------------|------|---|---|------|---------------------|
| | | | | | | production capacity |
| Tamsulosin hydrochloride | 0.10 | TPM | Tamsulosin hydrochloride | 0.10 | TPM | No change in CPM |

2. Details of Raw materials including water consumption and fuel consumption including changes in the raw material mix

| List of raw materials envisaged under EC / CTO with CAS Number | Quantity permitted under EC/CTO | Unit | List of raw materials proposed under clause 7(ii)(b) | Quantity proposed under clause 7(ii)(b) | Unit | Remarks if any |
|--|---------------------------------|------|--|---|------|--|
| 2.0 TPH X 1 & 3.0 TPH X 1 Coal fired Boilers | 12.50 | TPD | Nil | 0 | TPD | No change in CPM |
| Washings water consumption | 5.00 | TPD | Washings water consumption | 5.00 | TPD | No change in CPM |
| Process water consumption | 15.57 | TPD | Process water consumption | 15.31 | TPD | Decreasing water consumption after CPM |
| Cooling towers make up water consumption | 110.00 | TPD | Cooling towers make up water consumption | 110.00 | TPD | No change in CPM |
| DG sets of 1 x 1000 KVA | 0.374 | TPD | 0 | 0 | TPD | No change after CPM |
| Domestic water consumption | 3.00 | TPD | Domestic water consumption | 3.00 | TPD | No change in CPM |
| Scrubbing system water consumption | 1.00 | TPD | Scrubbing system water consumption | 1.00 | TPD | No change in CPM |
| Boiler make up water consumption | 30.00 | TPD | Boiler make up water consumption | 30.00 | TPD | No change in CPM |
| Gardening water | 6.00 | TPD | Gardening water | 6.00 | TPD | No change in CPM |
| 2.1. Approval for additional water consumption if applicable | | | | | | No |

3. Details of Effluent Generation

3.1. Quantity

| Propose | Quantity of existing effluent generation in KLD (as per EC/CTO) | Quantity of effluent generation after the proposed change in product or raw material mix in KLD | Mode of Disposal Ultimate Receiving Body |
|---------|---|---|--|
| Washing | 5.00 | 5.00 | ZLD system |
| Other | 3.00 | 3.00 | ZLD System (DM plant regeneration) |
| Cooling | 20.00 | 20.00 | ZLD system |
| Other | 1.00 | 1.00 | ZLD System (Scrubbing system) |

| Propose | Quantity of existing effluent generati on in KLD (as per EC/CTO) | Quantity of effluent generation after the proposed change in product or raw material mix in KLD | Mode of Disposal Ultimate Receiving Body |
|----------------|--|---|--|
| Process + APCM | 16.51 | 16.44 | ZLD system |
| Domestic | 2.50 | 2.50 | ZLD system |
| Boiler | 4.50 | 4.50 | ZLD system |

3.2. Quality

| Composition as per the EC/CTO | Concentration as per EC/CTO in (mg/L) | Composition after proposed change in product or raw material mix | Concentration after proposed change in product or raw material mix in (mg/L) | Remarks, if any |
|-------------------------------|---------------------------------------|--|--|------------------|
| PH value | 6.89 | PH value | 6.89 | No change in CPM |

3.3. Total load in respect of Effluent

| Total load in respect of Effluent as per the EC/CTO | Treatment facility existing (with capacity in KLD) | Total load in respect of Effluent after proposed change in product or raw material mix in KLD | Treatment facility proposed with capacity after proposed change in product or raw material mix in KLD | Remarks if any |
|---|--|---|---|--|
| 16.26 | 20630 | 16.00 | 50 | Decreases in total load in respect of effluent after CPM |

3.4. Details of effluent management

| | |
|--|------------------------------|
| 3.4.1. Whether Segregation of Concentrated stream and its disposal is proposed? | Yes |
| 3.4.1.1. Brief report on Segregation of Concentrated stream and its disposal | Effluent details.pdf Preview |
| 7.4.2. Whether Reduction / Recycle / Reuse of effluent are proposed? | Yes |
| 7.4.2.1. Brief report on details of Reduction / Recycle / Reuse of effluent | Effluent details.pdf Preview |
| 7.4.3. Whether any additional Effluent Treatment Facilities Provided? | No |
| 7.4.4. Whether is there any proposal for up-gradation of ETP? | No |
| 7.4.5. Whether the unit is having Membership of Common Effluent Conveyance / Disposal Facility? | No |
| 7.4.6. Whether it is Proposed to achieve zero discharge? | Yes |
| 7.4.6.1. Brief report on Proposal to achieve zero discharge | Effluent details.pdf Preview |

| | |
|--|----|
| with technical justification and feasibility | |
| 7.4.7. Whether Project has Membership of CETP? | No |

Emission Generation

1.Details of Emission Generation

1.1.

Quantity

(i) From Stacks

| Point Source (s) | Height of stack (m) | As per EC / CTO | | | After the proposed change in product or raw material mix | | | | |
|-------------------------|---------------------|-----------------|------|----------------|--|---------------|------|----------------|--|
| | | Emission rate | Unit | Total emission | Unit | Emission rate | Unit | Total emission | Unit |
| 3 TPH coal fired boiler | 30 | 0.0002 | g/s | 70.8 | Miligram per Normal cubic meter (mg/Nm3) | 0.0002 | g/s | 70.8 | Miligram per Normal cubic meter (mg/Nm3) |

(ii) From Fugitive sources

| Fugitive Sources | Height of discharge in m | As per EC / CTO | | | After the proposed change in product or raw material mix | | | | |
|------------------|--------------------------|-----------------|--|----------------|--|---------------|--|----------------|--|
| | | Emission rate | Unit | Total emission | Unit | Emission rate | Unit | Total emission | Unit |
| HCl | 5 | 14.5 | Miligram per Normal cubic meter (mg/Nm3) | 14.5 | Miligram per Normal cubic meter (mg/Nm3) | 14.5 | Miligram per Normal cubic meter (mg/Nm3) | 14.5 | Miligram per Normal cubic meter (mg/Nm3) |

(iii) From other sources

| Other Source(s) | Height of discharge in m | As per EC / CTO | | | After proposed change in product or raw material mix | | | | |
|--|--------------------------|-----------------|------|----------------|--|---------------|--------|----------------|--------|
| | | Emission rate | Unit | Total emission | Unit | Emission rate | Unit | Total emission | Unit |
| DG set - 500 KVA (existing) & 500 KVA (proposed) -PM | 4.5 | 0.0142 | | 0.0142 | Others | 0.0142 | Others | 0.0142 | Others |

1.2.

Quality

| Stack attached to | Stack Height in Meter | APCM | Parameter | Concentration | | | |
|---------------------------------|-----------------------|------------|-----------|-----------------|---|--|---|
| | | | | As per EC / CTO | Unit | After the proposed change in product or raw material mix | Unit |
| 2 TPH & 3 TPH coal fired boiler | 30 | Bag filter | PM | 70.8 | Miligram per Normal cubic meter (mg/Nm ³) | 70.8 | Miligram per Normal cubic meter (mg/Nm ³) |

2.

Total load in respect of Emission

| Total load in respect of emission as per the EC / CTO | Unit | APCM existing with capacity | Unit | Total load in respect of emission after proposed change in product or raw material mix | Unit | APCM proposed with capacity after proposed change in product or raw material mix | Unit | Remarks if any |
|---|------------|-----------------------------|---------|--|------------|--|---------|---------------------|
| 26.5 | Kg Per Day | 7500 | Cu.M/Hr | 26.4 | Kg Per Day | 7500 | Cu.M/Hr | No change after CPM |

3.Details of emission management

| | |
|--|------------------------------|
| 3.1. Whether there is any Proposal for switching over to cleaner fuel? | Yes |
| 3.1.1. Brief report on Proposal for switching over to cleaner fuel, if any (with time bound program) | Emission details.pdf Preview |
| 3.2. Whether there is any Proposal for the up gradation of existing APCM? (with the time-bound program) | No |
| 3.3. Whether there is Proposal for the installation of new APCM? (with time-bound program) | No |

1.Hazardous Waste Generation

1.1.

Quantity and type of waste

| Type of Waste | Category (As per Schedule under Hazardous & Other Waste Management Rules, 2016) | Generation per Year | | | | | | |
|-----------------------|---|------------------------------|------------|-----------------------------|------------|----------------------|-----------------|---|
| | | Existing as per the EC / CTO | Unit | After Change in Product Mix | Unit | Source of Generation | Mode of Storage | Mode of Treatment & Disposal method |
| Organic solid Waste | 28.1 of schedule -1 | 459 | Kg Per Day | 458.3 | Kg Per Day | Process | Drums | Will be sent to authorized Cement industries / AFRF facilities for pre-processing / TSDF |
| Detoxified Containers | 33.1 of schedule no-1 | 200 | Others | 200 | Others | containers | containers | After complete Detoxification, it will be disposed to the outside agencies. |
| MEE salts | NA | 1300 | Kg Per Day | 1059 | Kg Per Day | MEE | Bags | Will be sent to authorized Cement industries / AFRF facilities for pre-processing / TSDF |
| Waste Oils & Grease | 5.1 of schedule -1 | 700 | Others | 700 | Others | DG sets | Drums | Will be sent to SPCB Authorized Agencies for Reprocessing/Recycling |
| Spent Carbon | 28.3 of schedule -1 | 157 | Kg Per Day | 155 | Kg Per Day | Process | Drums | Will be sent to authorized Cement industries / AFRF facilities for pre-processing / TSDF |
| Spent solvents | 23.2 of Schedule-I | 18943.26 | Kg Per Day | 17149.94 | Kg Per Day | Process | Drums | Will be recovered within the plant premises to the maximum extent possible and reused. The Spent/mixed solvents, which cannot be reused in the plant, will be disposed to end users/Authorized cement manufacturing units for co-processing/TSDF, Dundigal, RR Dist. The industry will not dispose spent solvents/ mixed spent solvents to the traders/recyclers. |
| ETP Sludge | 35.3 of schedule-1 | 720 | Kg Per Day | 720 | Kg Per Day | ETP | Drums | Will be sent to authorized Cement industries / AFRF facilities for pre-processing / TSDF |
| Inorganic solid waste | 28.1 of schedule-1 | 708.5 | Kg Per Day | 704 | Kg Per Day | Process | Drums | Will be sent to authorized Cement industries / AFRF facilities for pre-processing / TSDF |
| Ash from | NA | 5880 | Kg | 5880 | Kg | Boiler | Bags | After complete Detoxification, |

| Type of Waste | Category (As per Schedule under Hazardous & Other Waste Management Rules, 2016) | Generation per Year | | | | | | |
|-------------------------------------|---|------------------------------|------------|-----------------------------|------------|----------------------|-----------------|--|
| | | Existing as per the EC / CTO | Unit | After Change in Product Mix | Unit | Source of Generation | Mode of Storage | Mode of Treatment & Disposal method |
| boilers | | | Per Day | | Per Day | operations | | it will be disposed to the outside agencies. |
| Solvent Distillation Bottom Residue | 36.1 of schedule -1 | 143.5 | Kg Per Day | 142 | Kg Per Day | Process | Drums | Will be sent to authorized Cement industries / AFRF facilities for pre-processing / TSDF |
| Used Lead acid batteries | 9.1 of schedule-1 | 5 | Others | 5 | Others | DG set | Batteries | Sent to supplier on buyback basis. |

1.2.

Details of Waste management

| | |
|---|---|
| 1.2.1. Whether Proposal for reduction / recovery / reuse / recycle / sale of waste (with technical details) is proposed? | Yes |
| 1.2.1.1. Brief report on Proposal for reduction / recovery / reuse / recycle / sale of waste, if any' | solid waste and hazardous waste details.pdf Preview |
| 1.2.2. Whether Project has Membership of Common Secured Landfill Site? | No |
| 1.2.3. Whether Project has Membership of Common hazardous waste incineration facility | No |

2.

No Increase in Pollution Load certificates from the authorized environmental auditor and countersigned by Project Proponent

| | |
|--|-----------------------------------|
| 2.1. Authorized environmental auditor/Reputed Institution | Authorized Environmental Auditors |
|--|-----------------------------------|

| | |
|--|---|
| Empaneled by the SPCB/CPCB/MoEFCC | |
| 2.2. Upload the Certificate of 'No Increase in Pollution' Load. | Environmental Auditor Certificate.pdf Preview |

3.

Online Continuous effluent/emission Monitoring System

Quantity

| | | | | | | | Date of connection to the servers of | |
|-----------|--------------|----------------------|------------------------------|------------------------------------|----------------|-----------------------------|--------------------------------------|------------|
| Attribute | Constituents | Date of installation | Details calibration of OCEMS | No. of time data exceeds the limit | Value Exceeded | Status of OCEMS functioning | CPCB | SPCB |
| Emissions | Boiler | 06/06/2016 | Calibrated | 0 | 0 | Yes | 15/03/2023 | 15/03/2023 |

1. Additional Information

| S. No. | Document Name | Remark | Document |
|--------|-----------------------------------|-----------------------------------|---|
| 1 | Monitoring Reports | Monitoring Reports | Monitoring Reports- Symed-I.pdf Preview |
| 2 | Existing CFO order | Existing CFO order | Symed Unit-I CFO Renewal valid up to 30.03.2025 (1).pdf Preview |
| 3 | Existing CFE order | Existing CFE order | Symed Labs Ltd.Unit-1 CFE.pdf Preview |
| 4 | Online flow meter certificates | Online flow meter certificates | online flow meter certificates.pdf Preview |
| 5 | TSDF certificate | TSDF certificate | Symed Labs-I Membership Certificate.pdf Preview |
| 6 | EMP report | EMP report | EMP.pdf Preview |
| 7 | EC copy | EC copy | EC Copy Unit-I.pdf Preview |
| 8 | Environmental auditor certificate | Environmental auditor certificate | Environmental Auditor Certificate.pdf Preview |
| 9 | CTE- CPM Application | CTE- CPM Application | Application Form For CTE.pdf Preview |
| 10 | CFO compliance | CFO compliance | CFO COMPLAINT DEC-2023.pdf Preview |
| 11 | CFE compliance | CFE compliance | CFE COMPLIANCE REPORT.pdf Preview |

1. Undertaking

I hereby give undertaking that the data and information given in the application and enclosures are true to be best of my knowledge and belief and I am aware that if any part of the data and information is found to be false or misleading at any stage, the project will be rejected and clearance given if any to the project will be revoked at our risk and cost. In addition to the above, I hereby give undertaking that no activity/construction/expansion has been taken up

| | |
|---------------------|-----------------|
| 1.1. Name | NarasingaRao Ch |
| 1.2. Designation | AGM - EHS |

| | |
|------------------------|--|
| 1.3. Company | SYMED LABS LIMITED |
| 1.4. Address | office: 8-2-293/174/3, Beside BN Reddy Colony, Road No. 14, Banjara Hills, Hyderabad |
| 1.5. Date | 27-03-2024 |

