REVOCA TION OF STOP PRODUCTION ORDER FOR ERECTION ACTIVITIES / MODIFICATION ACTIVITIES OF ZLD SYSTEM, MEE, SPRAY DRIER, DECANTER & NOT FOR PRODUCTION ACTIVITIES


Ref:
6. Complaint addressed to Secretary, MoEF&CC, dt.05.01.2019.
8. Industry request letter dt.10.05.2019 for revocation of stop production order.
9. The External Advisory Committee (Task Force) Meeting was held on 28.05.2019 at Head Office, Vijayawada.
11. CPCB Compliant No.F.Tech/38/pcds/19-20/402, Dt.06.06.2019.
12. Minutes of the External Advisory Committee (Task Force) Meeting held on 14.06.2019 at Head Office, Vijayawada

WHEREAS you are operating the industry in the name & style of M/s. Krebs Bio-chemicals Ltd., Kothapalli (V), Kasimkota (M), Visakhapatnam District and involved in manufacturing of bulk drugs.

WHEREAS the Board vide reference 1st cited, the Board has reviewed the status of pollution control measures taken by the industry before External Advisory Committee (TF) meeting held on 16.09.2016 and issued directions to the industry on 03.10.2016 for non-compliance of Board directions and consent order conditions.

WHEREAS the Board vide reference 2nd cited, has issued CFO & HW Authorization on 01.06.2017 with validity upto 31.03.2021 for manufacturing of Bulk Drug products. The industry permitted to manufacture 7 products at any given time i.e., 4 products from Group A to a maximum of 100% capacity (108.25 kg/day) and 3 products from Group B to a maximum of 100% capacity (1700 kg/day). Thus the industry proposed to manufacture a maximum capacity of 2768.25 kg/day.

WHEREAS the Regional Office, Visakhapatnam vide reference 3rd cited, has issued Show Cause Notice to the industry on 25.09.2018 for non compliance of the directions issued by the Board and for letting out the effluents outside the premises.

WHEREAS the Board has reviewed the status of pollution control measures taken by the industry before EAC (TF) meeting held on 10.10.2018 and issued specific directions vide reference 4th cited for discharge of untreated effluents outside the premises and non-compliance of consent order conditions.

WHEREAS the Board vide reference 5th cited, has issued the following directions on 02.01.2019:

1. The industry shall segregate effluents into a) process effluents which are bio-degradable, b) boiler blow down and cooling water blow down, c) process effluents with high COD & TDS, d) RO rejects, e) MEE condensate and f) domestic effluents (Canteen & overflow from septic tanks) and shall treat as per the options mentioned in the consent order. The industry shall maintain records for all the above segregate effluents and store separately in individual tanks.
2. The industry shall evaporate all the effluents stored within the premises in MEE within 30 days and maintain records pertaining to the quantity of effluents taken into MEE and MEE salts generated & disposed to TSDF.
3. The industry shall not discharge any effluents outside the premises under any circumstances.
4. The industry shall operate the ZLD system continuously.
5. The industry shall store the Hazardous solid waste and detoxified container & container liners on a raised platform in a closed shed with leachate collection system.
6. The industry shall remove all the pipe lines which are leading to compound wall and outside the premises.
7. The industry shall take necessary measures for control of spillages from the process area and tanks.
8. The industry shall prepare a detailed environment management plan covering all the aspects mentioned in these directions including micro water shed management plan to isolate and prevent discharge of contaminated run off to outside the premises.
9. The industry shall dispose off the Hazardous waste stored within the premises to TSDF immediately.
10. The industry shall submit a BG for Rs.10.0 Lakhs towards the compliance of the above directions in prescribed format to EE, RO, Visakhapatnam within 10 days.
11. The industry shall comply with all the directions issued by the Board vide order dated: 03.10.2016 & 29.10.2016.
12. The industry shall ensure continuous compliance of conditions issued in the CFO and HWA order.

WHEREAS vide reference 6th cited, a complaint was filed by Sri E.A.S. Sharma addressed to the Secretary, MoEF&CC and also to the Chief Secretary, GoAP on 05.01.2019 against the industry, for causing pollution problems by the industry.

WHEREAS the JCEE, ZO, Visakhapatnam vide reference 7th cited, issued stop production order on 09.05.2019 to the industry for not operating ZLD system & discharging untreated effluents, non-compliance of Board directions & consent order conditions duly obtaining the approval of Chairman, APPCB.

WHEREAS vide reference 8th cited, the industry represented to ZO, Visakhapatnam vide Lr. dt.10.05.2019 stating that they required 2 months time to comply the directions in Stop Production Order dt.09.05.2019 and also for lifting of effluents (450 KL) in storage tanks to M/s.Coastal Waste Management project, Parawada for treatment after getting permission from the Board. The ZO, Visakhapatnam has forwarded industry’s request to the Board office.

WHEREAS the Board has reviewed the status of pollution control measures taken by the industry before EAC (TF) meeting held on 28.05.2019 vide reference 9th cited and upon recommendations of the committee directed the officials of ZO & RO, Visakhapatnam to inspect the industry and verify the status of various items mentioned in their representation and to collect the bore well samples at a distances of 200m, 300m, 500m, 1000m from the industry along with GPS location & details of owners of bore wells, existing at downstream villages within five days and to verify the conditions stipulated in stop production order.

WHEREAS vide reference 10th cited, the EE, RO, Visakhapatnam inspected the industry on 31.05.2019 and furnished the report as follows:

1. The Industry was not in operation at the time of inspection.
2. The industry is having 7 no of blocks (including SRP) and the industry was operating two blocks, B and J and Solvent Recovery System (D Block).
3. The industry has transported about 390 KLD of effluents to M/s. Ramky Pharmacity for further treatment and disposal during the period 19.05.2019 to 26.05.2019.
4. The industry has removed all the effluents stored at the elevated place, which was observed at the time of earlier inspection and filled up with soil.
5. The small pools of the lagoons are removed and closed with soil.
6. The industry has pumped all the effluents in to existing tanks of aeration tank and effluent collection sump and about 400 to 500 KL of effluents are stored at present.
7. The industry has stored the effluents of quantity 50 to 60 KLD below ground storage tanks near raw water collection sump.
8. The industry has removed all the hope pipes exist in the premises.
9. The industry still in process of converting the oil fired boiler to coal fired boiler with dust collector as APC.
10. The industry is in the process of separating the boiler blow down and condensate streams without mixing in to effluents.
11. The industry is in the process of providing separation effluent collection sumps (tank in tank) for each block.

12. The industry has informed that they had submitted the sample of hazardous waste to M/s. Coastal Waste Management Project, Parawada, for characterization and to identify disposal of option, they proposed to send hazardous waste to TSDF after receipt of analysis report.

13. The ground water samples are collected from bore wells existing at the village for verification of ground water whether it is fit for drinking or not. The samples are collected at the following locations: Bore well sample collected from Kona Nageswararao House, MPP School, near Ramalayam temple, near Kona Ravanamma House, Konda Kannababu House, Gudala Jaganadharao land, Dairy Farm and Sarada Riverbed.

14. As per the analysis of the ground water samples collected, the water is fit for drinking at 2 locations (6 & 8) and the other water samples are not fit for drinking water purpose, as the presence of Conductivity. TDS and Conductivity are more due to the deep shallow wells and ground strata.

WHEREAS vide reference 11th cited, another complaint was received from Sri E.A.S. Sarma on 06.06.2019 addressed to the Secretary, MoEF&CC and the Chief Secretary, GoAP against the industry for causing ground water pollution.

WHEREAS legal hearing was conducted before the External Advisory Committee (Task Force) Meeting of A.P. Pollution Control Board on 14.06.2019. The representatives of the industry have attended the legal hearing. The Committee noted that Board issued stop production order on 09.05.2019 to the industry for not operating ZLD system & discharging untreated effluents, non-compliance of Board directions & consent order conditions. The EE, RO, Visakhapatnam informed that the industry was not in operation due stop production order issued by the Board. It was informed that they collected ground water samples at 8 locations at different areas, out of which, the analysis reports of ground water samples at 2 no. of locations indicate that they are fit for drinking water purpose and other water samples are not fit for drinking water purpose, due to the presence of high TDS. It was also informed that the industry is still storing 550 KL of effluents in aeration tanks / collection sumps. The coal fired boiler is not commissioned. Rectification of decanter not done. It was informed that the industry has not operated the MEE regularly due to inadequate capacity of Boiler for steam generation. The representative of the industry informed that they disposed 390 KL of effluents to M/s. Ramky Pharmacy, TSDF, Parawada for further treatment and stored 550 KL of effluents for treatment in ZLD system due to rectification of decanter. It was informed that new boiler was arrived and erection is under progress. Further, the management requested for revocation of stop production order.

After detailed review, the committee recommended to issue Revocation of Stop Production for erection activities / modification activities of ZLD system, MEE, Spray drier, decanter only. The Revocation Order is not for production activity.

Accordingly, the Board hereby issue Revocation of Stop Production for erection activities / modification activities of ZLD system, MEE, Spray drier and decanter and not for production activities with the following directions under Sec.33 (A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under Sec.31 (A) of Air (Prevention & Control of Pollution) Amendment Act, 1987:

1. The industry shall treat the 550 KL effluent in ZLD system or transport the effluent to JNCP, Parawada for further treatment.
2. The industry shall not start its production activities but operate only ZLD system, MEE and Spray drier and decanter for treatment of effluents.
3. The industry shall start production only after completion of evaporation of all the effluents (350 KL) stored in lagoons in the existing ZLD and after verification of the satisfactory compliance by the ZO/RO officials.
4. The industry shall not store any effluents below ground level storage tanks.
5. The industry shall construct separate effluent collections tankers at all the production blocks above ground level/tank in tank.
6. The industry shall provide separate the steam condensate without mixing with the effluents and shall provide separate collection sumps
7. The industry shall transport the hazardous waste stored within the premises to TSDF immediately for safe disposal.
8. The industry shall provide separate digital flow meters at the MEE inlet, MEE condensate, inlet of the Spray drier.
9. The industry shall provide ETP for the LTDS effluents and shall operate the RO system continuously.
10. The industry shall dismantle all the underground tanks immediately.
11. The industry shall conduct ground water study all around the industry with reputed local university.
12. The industry shall submit the BG for Rs. 10.0 Lakhs for due compliance of the above conditions within week.
13. The industry shall comply with all the directions issued by the Board vide order dated: 02.01.2019.

You are hereby directed to note that, should you violate any one of the directions mentioned above closure of the unit will be initiated under Sec.33 (A) of Water (Prevention & Control of Pollution) Amendment Act, 1988 and Sec.31(A) of Air (Prevention & Control of Pollution) Amendment Act, 1987 without any further notice, in the interest of Public Health and Environment.

This Order comes into effect from today i.e., 26.06.2019.

Sd/-
CHAIRMAN

To
Mis. Krebs Bio-chemicals Ltd.,
Kothapalli (V), Kasimkota (M),
Visakhapatnam District.

Copy to:

1. The Joint Chief Environmental Engineer, Zonal Office, Visakhapatnam for information and with a direction to re-inspect jointly with EE, RO, Visakhapatnam and to verify the status of all pollution control measures, disposal of effluents stored, dismantling of underground tanks, disposal of hazardous waste and furnishing of Bank Guarantee and furnish the detailed inspection report.

2. The Environmental Engineer, Regional Office, Visakhapatnam for information and with a direction to re-inspect jointly with JCEE, ZO, Visakhapatnam and to verify the status of all pollution control measures, disposal of effluents stored, dismantling of underground tanks, disposal of hazardous waste and furnishing of Bank Guarantee and furnish the detailed inspection report.

3. The Regional Director, CPCB, Regional Directorate (South), 1st & 2nd Floors, Nisarga Bhawan, 7th D Cross, Thimmaiah Road, Shivangar, Bangalore-560079 for favor of information.

// T.C.F.B.O //

JOINT CHIEF ENVIRONMENTAL ENGINEER
(UH-II)