TEMPORARY REVOCATION OF STOP PRODUCTION ORDER

Order No. 426/APPCB/UH-II/TF/NLR/2018

Dt. 27.12.2018.


Ref:
2. Complaint from Sri K. Sreenivasulu, Farmer, Thimmanagiripalem received on 12.06.2018 and also through District Collector, Nellore.
4. The industry's request letter dt.09.08.2018.
6. The industry's request letter dt.23.11.2018 for revocation of stop production order.

WHEREAS you are operating a Tyre Pyrolysis Oil unit in the name & style of M/s. Alliance Hydrocarbons located at Sy.No.302/2, Thimmanagiripalem (V), Kadivedu (Rural), Chilakur (M), SPSR Nellore District.

WHEREAS the Board has issued CFO order to produce Distilled Tyre Pyrolysis Oil (Lighter Fraction) - 4.5KLD (135 KLM) & By-products Scrap steel - 1.0 TPD & Black Carbon (Pyro char) - 3.0 TPD vide reference 1st cited, which was expired on 30.09.2014.

WHEREAS you are operating the industry without obtaining valid CFO order of the Board, as required under section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974 and under section 21/22 of the Air (Prevention & Control of Pollution) Act, 1981 and rules made therein.

WHEREAS RO, Nellore has received a complaint from Sri K. Sreenivasulu, Farmer, Thimmanagiripalem, SPSR Nellore District and also through the District Collector, SPSR Nellore District on air pollution problems being caused due to operation of your industry vide reference 2nd cited.

WHEREAS the Board has reviewed the status of pollution control measures taken by the industry before External Advisory Committee (Task Force) meeting held on 04.07.2018 at Head Office, Vijayawada. The committee recommended to direct EE, RO, Nellore to issue Stop production order to the industry. Accordingly, the EE, RO, Nellore issued Stop production order to the industry on 28.07.2018 vide reference 3rd cited for operating the industry without valid consent order of the Board and non-compliance of SOPs framed by MoEF&CC, GoI for Tyre Pyrolysis Units.

WHEREAS vide reference 4th cited, the industry has requested the Board for revocation of Stop production order vide letter dt.09.08.2018 as they have complied with the most of directions issued by the Board. The issue was reviewed in the task force committee meeting held on 09.10.2018 and the committee recommended for continuation of the stop production order. Accordingly the Board issued continuation of stop production orders vide order dated 22.10.2018 for non-compliance of the conditions stipulated in Standard Operating Procedure (SOPs) framed by MoEF&CC to the Paralysis units and Board directions.

WHEREAS vide reference 6th cited, the industry has again requested the Board to revoke the stop production order issued vide order dated.22.10.2018 intimating the industry has provided cutting machine for shredding of tyres, pipeline arrangements for usage of
pyro gas as fuel to the reactor, placed order for procurement of PLC system, procured additional land for storage of crumbed rubber, carbon black, provided nitrogen purging system and mechanized system for removal of carbon.

WHEREAS vide reference 7th cited, the officials of RO, Nellore have again inspected the unit on 28.11.2018 and verified the compliance of SOP procedures with respect to Tyre paralysis Oil units. The status is as follows:

- The industry is not in operation.
- Green belt development is poor.
- The industry is procuring all sorts of rubber/crum rubber pieces of different sizes, O-rings, etc along with tyres, which were stored openly and spread all over the premises.
- The industry is having a cutting machine for shredding of tyres. Mechanized system not provided for feeding of the tyres.
- The industry representative informed that they are taking up steps to provided pipe lines to use liquid fuel for initial heating of the reactor. The industry has not provided 30 Mt. chimney to release flue gas.
- Pipe lines for usage of pyro gas as fuel to the reactor is observed.
- The industry has provided closed chamber with burners for excess Pyro gas flaring. The industry has not provided any facility to flare the excess pyro gas at 30mts height.
- Indicator is provided to indicate any abnormalities in temperature and pressure in the process. But they have not provided Automatic interlocking system such as Programmed Logic Control (PLC). The industry representative informed that they have given work order to procure PLC system.
- The industry representative informed that they are replacing the graphite rope with metallic gas pipes to seal the reactor and thus to control fugitive emissions during the process.
- Closed pipe line connections from condensers to storage tanks are observed. The storage tanks are closed vessels with proper vents.
- Two Nitrogen cylinders are procured by the industry. The industry representative informed that they procured them for the purpose of Nitrogen purging into the reactor.
- The industry agreed to comply the same.
- The industry has provided screw mechanized system to remove carbon. Carbon spillage near the reactor and surroundings of godown was observed.
- The industry has acquired land of about 5664 Sq. mtrs for storage of crumb or cut tyres, oil and carbon black.
- Industry has not provided ETP and not tie-up with TSDF for disposal of ETP sludge and oily sludge.

WHEREAS legal hearing was conducted before the External Advisory Committee (Task Force) of A.P. Pollution Control Board in its meeting held on 05.12.2018. The representatives of the industry attended the legal hearing. The Committee noted that the Board has issued stop production order to the industry on 28.07.2018 for operating the industry without valid consent and non-compliance of SOPs by MoEF&CC, Gol. The request of the industry for revocation of stop production order was reviewed in the meeting held on 09.10.2018 and recommended to continuation of stop production order as the representative of the industry not able to explain the measures taken by the industry. The AEE. RO, Nellore has informed that the industry is not in operation as the stop production order issued by the Board. It was informed that the industry has provided cutting machine for shredding of tyres and not provided mechanized system for feeding of the tyres. The industry has provided closed chamber with burners for excess Pyro gas flaring. The industry has acquired land of about 5664 Sq. mtrs for storage of crumb or cut tyres, oil and carbon black. It was also informed that the industry applied for CFO of the Board and same was rejected by ZO, Vijayawada until obtaining revocation of stop production. The representative of the industry informed that they provided cutting machine for shredding of tyres, pipeline arrangements for usage of pyro gas as fuel to the reactor, placed order for procurement of PLC system, procured additional land for storage of crumbed rubber, carbon black, provided nitrogen purging system and mechanized system for removal of carbon. The representative of industry assured that they will comply all the directions issued by Board within two months and requested for revocation of stop production.

After detailed review, the Committee has recommended to issue Temporary Revocation of Stop Production order for period of one year with certain directions. Accordingly, the Board hereby issues Temporary Revocation of Stop Production Order for a period of one year 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 obtain CFO order of the Board immediately.

2. The industry shall install suitable machinery for removal of steel wire from the tyres and shall feed tyres devoid of steel to the pyrolysis reactor. The feeding arrangement to the reactor should be mechanized.

3. The industry shall use only liquid fuel or gas for initial heating of the reactor. The chimney height shall provide 30 mtrs for releasing the flue gas into the environment.

4. The industry shall flare excess pyro gas through properly designed flaring system of adequate capacity considering the emergency situation in which the entire gas may have to be flared and the flaring should be done at a minimum height of 30 mts.

5. The industry shall provide adequate instrumentation for measurement and control of temperature and pressure along with the safety interlocks incase of increase of temperature or pressure to cutoff heating of the reactor. Automatic control systems such as Programmed Logic Control shall be provided within one month as committed by the management.

6. The industry shall cool the reactor before removal of carbon. The reactor should be purged with Nitrogen during this process.

7. The industry shall remove the carbon through a mechanized system and it should be ensured that no spillage takes place during the collection of carbon in the bags.

8. The industry shall provide adequate number fire-fighting system like sprinklers and fire hydrants with necessary pumping system and water storage.

9. The industry shall construct the effluent treatment plant for properly treating the waste water generated in the process from condensers or any scrubbers and sludge generated should be sent to treatment storage disposal facility (TSDF).

10. The industry shall treat the oil containing water condensate in suitable ETP & Oil sludge/residues should be disposed through TSDF.

You are hereby directed to note that, should you misuse this order and violate any one of the conditions mentioned above, your unit will be closed under Sec.33 (A) of Water (Prevention and Control of Pollution) Amendment Act, 1988, and under Section 31 (A) of Air (Prevention & Control of Pollution) Amendment Act, 1987, in the interest of Public Health and Environment and you will be also liable for prosecution in the Court of Judicial Magistrate First Class under Sec.41 (2) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under Sec.37(1) of Air (Prevention and Control of Pollution) Amendment Act, 1987, the punishment for which includes imprisonment for a term which shall not be less than one year six months and which may be extended to six years and with fine.

This Order comes into effect from today i.e. 27.12.2018.

Sd/-
MEMBER SECRETARY

To
M/s. Alliance Hydrocarbons,
Sy.No.302/2, Thimmanagari Palem (V),
Kadivedu Rural, Chinthalakur (M),
SPSR Nellore District.

Copy to:
1. The Joint Chief Environmental Engineer, Zonal Office, Vijayawada for information and necessary action.
2. The Environmental Engineer, Regional Office, Nellore for information and necessary action.

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

JOINT CHIEF ENVIRONMENTAL ENGINEER
UH-II