TEMPORARY REVOCATION OF CLOSURE ORDER


   3. Industry’s request letter dt.11.01.2019 for revocation of closure order.
   5. Minutes of External Advisory Committee (Task Force) Meeting held on 29.01.2019.

WHEREAS you are operating the Tyre Pyrolysis in the name & style of M/s. Jayabharath Rubber Industry, Plot.No: 207, IDA, Kadapa, YSR District involved in manufacturing of Pyrolysis oil – 3 KLD, Crumb rubber – 1 TPD, Carbon Black – 2.5 TPD & Steel – 1.5 TPD by using rubber scrap and waste tyres as raw materials.

WHEREAS vide reference 1st cited, the Board issued CFO order on 16.07.2015 duly stipulating certain specific conditions for compliance which is expired on 30.06.2016.

WHEREAS the Zonal Office, Kurnool vide reference 2nd cited, reviewed the status of pollution control measures taken by the industry before the External Advisory Committee Meeting on 29.03.2018 and issued closure order to the industry on 31.03.2018 for operating the industry without valid consent for operation of the Board and for non-compliance of Standard operating procedures (SOPs).

WHEREAS vide reference 3rd cited, the industry, requested the Board to revoke the closure order stating that they have complied with the SOPs and applied for CFO of the Board.

WHEREAS the industry has applied for CFO renewal through SDP portal on 10.12.2018 & same is rejected by Zonal Office, Kurnool on 04.01.2019 stating that issue of CFO to the industry will be considered subject to submission of Revocation of closure order issued to the industry and compliance of SOPs.

WHEREAS vide reference 4th cited, the Officials of RO, Tirupati inspected the industry on 17.01.2019 and reported that the industry was not in operation due to closure order issued by the Board. The status on compliance of SOPs issued vide Lr. Dt.24.11.2015 is as follows:

1. The unit has provided wire pulling machine for removal of steel from tyre and cutting machine for cutting of the tyres to small pieces.
2. No provision made to use liquid fuel or gas.
3. No provision of initial heating to be done by liquid fuel or gas, during the pyrolysis, the pyro gas generated within the plant should be used as a fuel.
4. No provision of Excess pyro gas if any to be flared through properly designed flaring system of adequate capacity considering the emergency situation in which the entire gas has to be flared. The flaring should be done at a minimum height of 30 meter.
5. PLC system not provided.
6. Not provided purged system with nitrogen.
7. The industry has not provided mechanized system for removal of carbon.
8. The industry has not provided adequate number of sensors along with alarm system.
9. The industry has provided adequate firefighting system like sprinklers and fire hydrant with necessary pumping system and water storage.
10. The industry has acquired an area of about 1393.54 Sq mtrs.
11. The industry representative informed that they have obtained permission from the concerned departments and now the industry applied for CFO renewal.
12. At present the industry is not in operation due to closure order issued by ZO, Kurnool.
13. The industry representative informed that they will dispose oily sludge / residues to cement industries.

WHEREAS legal hearing was conducted before the External Advisory Committee (Task Force) of A.P. Pollution Control Board in it meeting held on 29.01.2019. The representative of the industry has attended the legal hearing. The Committee noted that the Zonal Office, Kurnool has issued closure order on 31.03.2018 to the industry for operating the industry without valid consent order of Board and for non-compliance of Standard operating procedures (SOPs). The Committee also noted that non-compliance of Board directions and SOPs issued by the MoEF&CC. The EE, RO, Tirupati has informed that the industry has provided wire pulling machine for removal of steel from tyres, tyre cutting machine for cutting of the tyres, firefighting system and also industry has acquired additional land to an extent of 393.54 Sq mtrs. The EE, RO, Tirupati also informed that the industry has not provided PLC system and sensors along with alarm system to detect leakages of flammable vapors from the system, not provided flaring system and not provided ETP. The representative of the industry informed that they have installed 30 mtrs stack attached to the scrubber and requested for revocation of closure order as they have to complete pollution control measures.

After detailed review the committee recommended to issue Temporary Revocation of Closure Order for a period of 3 months with certain directions. The Board hereby issues Temporary Revocation of Closure Order for period of 3 months 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 as required under Sec.25 / 26 of Water Act and under Sec.21 / 22 of Air Act immediately.
2. 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.
3. 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.
4. The industry shall cool the reactor before removal of carbon and the reactor should be purged with Nitrogen during this process.
5. 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.
6. 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).
7. The industry shall treat the oil containing water condensate in suitable ETP & Oil sludge/residues should be disposed through TSDF.
8. The industry shall comply SOPs issued by the MoEF & CC within two months.
M/s A.P.S.P.D.C.L., has been requested to restore power supply to M/s. Jayabharath Rubber Industry, Plot.No: 207, IDA, Kadapa, YSR District.

You are hereby directed to note that, should you misuse this order to operate the unit beyond the time period given to you 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., 27.02.2019.

Sd/-
CHAIRMAN
APPCB

To
M/s. Jayabharath Rubber Industry,
Plot.No: 207, IDA, Kadapa,
YSR District.

Copy to:
2. The Superintending Engineer (Operations), APSPDCL, Kadapa, YSR District for information and necessary action.
3. The Joint Chief Environmental Engineer, A.P. Pollution Control Board, Zonal Office, Kurnool for information and necessary action.
4. The Environmental Engineer, A.P. Pollution Control Board, Regional Office, Tirupati for information and necessary action.

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

JOINT CHIEF ENVIRONMENTAL ENGINEER
UH-II