ANDHRA PRADESH POLLUTION CONTROL BOARD  
D.No.33-28-14, D/2, Near Sunrise Hospital, Pushpa Hotel Centre, 
Chalamalavari street, Kasturibaipeet, Vijayawada – 520 010

Regd. Post with Ack Due

Order No. 756/APPCCB/UF-II/TF/VSKP/2018- 1578— Date: 02.01.2019

DIRECTIONS

Sub: APPCB – UF-II - TF - M/s. Krebs Bio-chemicals Ltd., Kothapalli (V), Kasimkota (M), Visakhapatnam District – Not operating the ZLD (MEEs & ATFD) and discharging untreated effluents - Non-compliance of Board directions and consent order conditions – Directions - Issued - Reg.


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 (1058.25 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 2758.25 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 EE, RO, Visakhapatnam vide reference 5th cited, has inspected the industry on 14.11.2018 and observed the following violations:

1. The industry has not rectified MEEs & ATFD to fit for operations. It was understood that the existing capacity of boiler is not sufficient to operate entire ZLD system and caters to needs of production only.
2. The industry is not operating the ZLD system (MEEs & ATFD) and discharging untreated effluent onland for percolation. The untreated effluent mixing with rain water and carrying to the downstream of the area and joining Saradha River.
3. The industry is storing huge quantity of HTDS effluents in lagoons to brim level and over flow of stored the effluents are being carried away to downstream area causing contamination of ground and surface waters of River Saradha.
4. The industry is storing the hazardous waste (MEE Salts, ETP sludge) in an open area within the industry premises and thereby giving scope for leaching into the ground water.
5. Lot of hose pipe lines are observed to be laying haphazardly and thereby concluded that they are spraying HTDS effluents onland.
6. The industry has not submitted a BG for Rs. 10.0 Lakhs towards the compliance of Task Force directions, whereas the industry requested for waiving of Bank Guarantee vide letter dt. 16.11.2018.

7. The villagers are complained that the industry is spraying the HTDS effluents on land and the sprayed effluents getting mixed with rain water and causing contamination to the surface waters, Sarada River located at D/s of the industry.

WHEREAS the SEE, ZO, Visakhapatnam vide reference 6th cited, has inspected the industry on 04.12.2018 and observed the followings:

a) The industry is manufacturing only one consented product i.e., Serratio Peptidase within the consented capacities.

b) The industry is utilizing 1315 KL of water during the month of November, 2018 against consented capacity of 17304.6 KL/month.

c) Effluents are observed to be stored in one of the lagoon existing on the slope of the hill and in the old aeration tank of the abandoned ETP. The quantity was informed to be around 400 KL and 250 KL respectively. Around 60 – 70 KL of effluents are observed to be existing in a circular tank for feeding to decanter. Around 120 KL of MEE concentrate is existing in the holding tank located beside MEE.

d) The industry is not maintaining proper record of the effluent generation from each section. Part of the process effluents generated are sent to decanter where the excess solids are removed and is taken to MEE / spray drier directly for further treatment. It is informed that process effluents vary from 5 KLD to 7 KLD and are of two types i.e, effluents which does not have any synthetic chemicals or solvents and ii) effluents from solvent recovery section(SRS). The first type of effluents after decanting are directly fed to spray drier. The second type of effluents are fed to MEE and the MEE concentrate is sent to the spray drier.

e) The industry has informed that they are also sending the effluent generated from canteen to MEE for evaporation. The actual generation of effluents is informed to be around 10 KLD at present. The boiler blow down and the cooling tower blow down are discharged directly onland. The RO rejects are used for onland for irrigation in their premises.

f) The industry has not provided biological effluent treatment plant and is sending all the effluents including the effluents generated from canteen to the MEE. The treatment of all the effluents in MEE is not appropriate and the industry has to segregate various streams and needs to plan separate treatment options and has to prepare proper action plan for segregation, biological treatment and also for the effective utilization of existing MEE and the spray drier.

g) The industry has provided a shed of around 250 Sq.ft for storage of hazardous waste. However, only the chemicals, activated carbon, lime and few carboys containing solvents are observed to be stored in the shed. Around 45 drums containing distillation residues are stored on a platform and the dyke walls / periphery wall provided is observed to be damaged.

h) The industry has also provided two rooms in which bags containing spent lime, spent carbon and carp residues are stored.

i) Around 150 drums containing used solvents and chemicals are observed to be stored in open in the premises. It was informed that the material belongs to M/s. Mylan Laboratory Limited which has given job work to this industry earlier and the material is held due to court case on some financial disputes with M/s. Mylan Laboratory Limited.

j) The industry has not disposed any hazardous waste till date violating the hazardous waste rules. The industry has to dispose the onsite stored hazardous waste to TSDF immediately.

k) It is observed during inspection that a bulldozer is working in the premises for scrapping the top soil and preparing the bunds. It was informed that they are preparing the area for tree plantation. However, it is noted from the file that this area has been utilized earlier for disposal/sprinkling of untreated effluents. However, there is no trace of any discharge of effluents in the recent past in this area as the entire area is dry.

l) The industry is located on a sloping terrain and any discharge of effluents onland would join the River Sarada which is located at a distance of less than 500 mtrs from the process area. Even the contaminated run off during storm days will reach River Sarada within very short time. The industry is required to isolate the area which is likely to contaminated the storm water and collect the entire storm water from that area and divert for treatment. The industry has to prepare micro water shed management plan to isolate and prevent the discharge of contaminated run off to outside the premises.

m) The industry has provided dust collectors for the 6 TPH coal fired boiler which may not be adequate and may be directed to provide bag filters as air pollution control equipment.
After careful consideration of material facts of the case, the Board hereby issues 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 segregate effluents into a) process effluents which are biodegradable, b) boiler blowdown and cooling water blowdown, 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 & 29.10.2018.

12. The industry shall ensure continuous compliance of conditions issued in the CFO and HWA order.

You are hereby directed to note that, should you violate any one of the directions mentioned above, action 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., 02.01.2019.

Sd/-
CHAIRMAN

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

Copy to:

1. The Joint Chief Environmental Engineer, Zonal Office, Visakhapatnam for information and necessary action.

2. The Environmental Engineer, Regional Office, Visakhapatnam for information and necessary action.

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

JOINT CHIEF ENVIRONMENTAL ENGINEER
UH-II