TEMPORARY REVOCATION OF STOP PRODUCTION ORDER


Ref: 1. Complaint filed by Sri. Nandamuri Balakrishna, MLA, Hindupur, Anantapur district against the industry.
5. Industry’s request letter dt. 31.03.2016.
7. Task Force Committee Meeting held on 02.05.2016.

Whereas you are operating the industry in the name & style of M/s. R. L. Fine Chem Pvt. Ltd., (Formerly M/s Raypharma & Ray International Ltd.), Plot No.172, 173, 174, & 175, IDA, Thumukunta Village Hindupur Mandal, Anantapur District for manufacturing of Drug Intermediates (Benzyl Alcohol – 100 Kg/day, Liminobenzyl – 100 Kg/day).

Whereas vide reference 1st cited, a complaint was received from Sri. Nandamuri Balakrishna, Hon’ble MLA, Hindupur, Anantapur district stating that local people of Thumukunta Industrial Area and surrounding villages have represented to him that chemical factories and Iron factories in that area are causing pollution.

Whereas vide reference 2nd cited, the Board issued directions to the industry on 31.12.2015 for non-compliance of CFO conditions and Complaint received against the industry

Whereas vide reference 3rd cited, the Board issued Stop Production Order to the industry on 21.03.2016 for following reasons:

a. For manufacturing un consented products without obtaining necessary permissions from the Board and MoEF, Govt., New Delhi.

b. For manufacturing the products more than the consented capacity and thereby generating the waste water more than the quantities mentioned in the consent order dt.29.11.2013 & 04.12.2014.

c. For letting out treated /untreated effluents into the bore well located in the adjacent land owned by the Company through a pipeline laid underground from cooling tower to bore well.

d. For not operating Stripper, MEE & ATFD regularly. The industry has also not provided any Flow meters to measure feed, condensate and concentrate etc. and separate energy meter to record power consumption.

e. For not disposing off the accumulated hazardous waste dumped in an underground pit at South-West corner of the premises taken on lease, to TSDF, since 01.04.2013.

f. For not storing raw materials, hazardous waste, intermediate chemicals on raised concrete platform in enclosed area.

g. For causing odour nuisance to the surrounding area.

h. For not complying the directions issued by the Board vide order dt.31.12.2015.

Whereas vide reference 4th cited, the Board issued Consent for Operation and Hazardous Waste Authorization order vide dt.26.03.2016 which is valid upto 30.08.2020.

Whereas vide reference 5th cited, the industry requested the Board for revocation of stop production order. The industry stated that they have complied the Board directions vide letter dt.31.03.2016.
WHEREAS vide reference 6th cited, the EE, RO, Kurnool has inspected the industry on 13.04.2016 and submitted the followings:

- Previously industry has produced unconsented products. In their representation, the industry submitted that they would not produce any unconsented products until necessary permissions are obtained from the Board.
- The industry submitted that they would manufacture only consented products and consented quantities hereafter until necessary permissions are issued by the Board. Subject to this condition, there will not be any additional effluents generation.
- As per the previous analysis reports, the bore well water is contaminated suspected due to the Industry discharges of effluent into it. During the inspection, it is observed that water from bore well is being used for green belt development within the premises. Legal sample was collected to verify the contaminates. As per the Industry's letter, the High TDS is due to calcium and magnesium salts not by the discharge of industrial effluents. Until further verification and confirmation, the industry may be directed not to use bore well water for any purpose including gardening and domestic use.
- The industry has provided meters at MEE feed and at condensate outlet. Energy meter is not yet provided. The industry claims that MEE and AFTD are in working conditions and will operate once permission for production is given. The industry has to provide biological ETP, RO plant and cameras to meet ZLD conditions.
- Previously industry has dumped hazardous waste in the concrete pit located back side of the leased premises of the unit. According to the industry, they have lifted the hazardous waste from this concrete pit. During the inspection it is observed that the pit is closed with clay. Industry has lifted 1290 Kgs of hazardous waste on 9th Feb, 2016 and again 736 Kgs on 3rd March, 2016. As compared to size of pit observed during the previous inspection, the hazardous waste sent to the TSDF is very less, therefore, the pit has to be opened up to find any hazardous waste still lying in side. The industry was asked to open up the pit for verification and ensure that all the waste is sent to TSDF.
- The industry has provided enclosed material storage area. However, some spent and recovered solvents are stored openly on the ground.
- The industry has provided venture scrubber to control the process emission. However, the raw material characteristic odour is observed in the premises.
- There is no discharge of effluents outside the premises. The industry has submitted Bank guarantee for Rs.2.0 Lakhs valid upto 02.02.2017 as directed by the Board.

WHEREAS vide reference 7th cited, hearing was conducted by the Task Force Committee of A.P.Pollution Control Board on 02.05.016 to review the status of the industry. The representatives of the industry attended the legal hearing. The Committee noted the non compliance of the directions. The committee also noted that the analysis report of bore well water sample has revealed that there is a suspected contamination of the ground water. The committee also noted that the industry has covered the hazardous waste pit with soil and lifted meager quantity of hazardous waste to TSDF.

The industry representative informed that they have not discharged any effluent into the bore well and the bore well water is being utilized for green belt development. The industry has also informed that they have lifted hazardous waste to TSDF. The representative of the industry informed that they will provide the biological ETP & RO Plant within 6 months. Finally, the industry requested the Committee for revocation of stop production order.

The Committee after detailed discussions recommended to issue temporary revocation of stop production order upto a period of Six months i.e. 31.10.2016 with the following directions:

1. The industry shall not manufacture any un-consented products without CFE order of the Board.
2. The industry shall not manufacture the products more than the consented capacity.
3. The industry shall provide biological ETP & RO Plant within 6 months so as to achieve zero liquid discharge.
4. The industry shall store the raw materials, hazardous waste, intermediate chemicals on raised concrete plat form in enclosed area within 2 months.
5. The industry shall not create odour nuisance to the surrounding area.
6. The industry shall operate stripper, MEE & AFTD regularly.
7. The industry shall open up the underground pit at South-West corner of the premises taken on lease in the presence of Board officials and shall dispose-off the accumulated hazardous waste along with top layer of the soil dumped in the under ground pit to TSDF.
8. The industry shall ensure the validity CFO of the Board and ensure continuous compliance of the conditions issued by the Board.

9. The industry shall develop the thick green belt within the plant premises during coming monsoon season.

10. The industry shall submit the Bank Guarantee of Rs. 3.0 Lakhs for compliance of above directions within 1 week.

11. The industry shall submit the compliance report on above directions every month to Regional Office, Kurnool.

The Board hereby issue Temporary Revocation of Stop Production order to the industry for period upto 31.10.2016 under Sec.31(A) of Air (Prevention and Control of Pollution) Act and under Sec.33 (A) of the Water (Prevention & Control of Pollution) Amendment Act.

The above mentioned directions shall be implemented by the industry, failing which action would be initiated against the industry under Sec.33 (A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 under Sec. 31 (A) of Air (Prevention and Control of Pollution) Amendment Act, 1987 directing closure of the industry and forfeiture of the Bank Guarantee without any further notice, in the interest of Public Health and Environment.

This Order comes into effect from today i.e., **11.05.2016**.

Sd/-

MEMBER SECRETARY

To

M/s. R.L Fine Chem Pvt. Ltd.,
Plot No.172, 173, 174, & 175, IDA,
Thumukunta Village Hindupur Mandal,
Anantapur District – 508 252.

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

JOINT CHIEF ENVIRONMENTAL ENGINEER

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