EXTENSION OF TEMPORARY REVOCATION OF STOP PRODUCTION ORDER


Ref: 1. Complaint filed by Sri. Nandamuri Balakrishna, MLA, Hindupur, Anantapur district against the industry.
   4. Temporary Revocation of Stop Production Order No.33/APPCB/TF/KNL/2015, dt.11.05.2016.
   7. Board officials inspected the industry on 22.10.2016 under randomized risk based inspections.

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.

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 certain 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 manufacturing of un-consoled products and non-compliance of Board directions.

WHEREAS vide reference 4th cited, the Board issued Temporary Revocation of Stop Production Order for period of six months i.e. upto 31.10.2016 with certain directions.

WHEREAS vide reference 5th cited, the Board issued Consent for Operation and Hazardous Waste Authorization order vide dt.26.03.2016 which is valid upto 30.09.2020.

WHEREAS vide reference 6th cited, the industry requested the Board on 21.10.2016 for Revocation of Stop Production Order. The industry stated that they have complied the Board directions vide letter dt.31.03.2016 & 11.05.2016.

WHEREAS vide reference 7th cited, the Board officials inspected the industry on 22.10.2016 under randomized risk based inspections and observed the following violations:

1. The temporary revocation of the stop production order validity was expired by 31.10.2016. Presently the industry is operating without valid revocation of the stop production order. The industry shall operate the activity with valid temporary revocation of the stop production order of the stop production order.
2. The Board issued the temporary revocation of the stop production order on 11.05.2016. Since then the industry is in continuous operation. The industry is operated 164 days since issue of temporary revocation of the stop production order. The industry would
generate 410KLD of wastewater, 941.5Kgs of Hazardous waste. Whereas at about 400kgs of MEE salts and ETP sludge at about 400kgs of spent carbon and 200lts of organic residue are stored in the industry premises. As per the data, it is ascertained that the industry is not operating the stripper, MEE & ATFD regularly.

3. During the inspection at about 25KL of effluent was stored in the industry premises and at about 49.304 M³ of MEE condensate was roughed through digital flow meter. The industry is not recycling the MEE condensate. Only 5.0KL of MEE condensate was stored in the industry premises. The industry disposing the MEE condensate on onland and the stripper, MEE & ATFD area is wetted with MEE condensate.

4. The industry has not provided separate water meters for assessing the quantity of water used for process washings, industrial cooling, boiler feed, domestic purposes etc.

5. The industry has not remitted the water cess amount to be paid M/s. Ray Pharma & M/s. Ray International up to the date of the amalgamation of both the industries.

6. The industry has not provided biological ETP & RO plant so as to achieve Zero Liquid Discharge.

7. The industry has not provided all the units of the stripper, MEE & ATFD with impervious to prevent ground water pollution. The industry constructed the units of ZLD system above the ground level but not provided seepage collection pit for collection of seepages.

8. The industry utilizing MEE condensate on land as against recycling.

9. The industry is collecting the effluents from the production blocks through underground drains and below ground level collection tanks. The industry has to construct above ground level tanks for neutralization, filtration, to avoid seepage of waste water.

10. The industry has not installed flow meters with totalizer at the following points: a) inlet & outlet of stripper; b) outlet of MEE concentrate c) treated effluent recycling lines.

11. The industry has not provided containers detoxification facility.

12. The industry has not installed VOC analyzer with recording facility.

13. The industry has not provided online PH measuring facility with auto recording system to the scrubbers provided to treat the process emissions.

14. The industry has not opened 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 underground pit to TSDF within 3 months in compliance with the CFO order conditions.

15. The industry has not developed green belt in an area of about 3.2 acres in addition to the existing green belt of one Acre in this monsoon to achieve 33% green belt.

16. The industry has stored at about 500no of 200lts barrels contained with spent solvents, which are to be recovered.

WHEREAS vide reference 8th cited, legal hearing was conducted before the External Advisory Committee (Task Force) Meeting of A.P. Pollution Control Board on 30.12.2016. The representatives of the industry attended the legal hearing. The committee noted the non-compliance of CFO order conditions and directions of the Board. The representative of industry informed that they are producing consented products only and obtained CFE for change of product mix on 30.07.2016. It was informed that they got the quotation from M/s.Pennar Envirotech, Hyderabad for LTDS treatment systems. Order will be issued to the industry within few days. They are also planning to utilize the facility of CETP if available for LTDS treatment. It was also informed that they will provide VOC analyzers with recording facility and containers detoxification facility by the end of January/2017. The committee instructed the management to comply the all directions within 2months time and shall not discharge any waste water into outside of the industry premises.

The Committee after detailed discussions, recommended to issue Temporary Revocation of Stop Production Order for period upto six months i.e. 30.04.2017 with the following directions for 6 months:

1. **The industry shall apply for CFO order of the Board for change of product mix immediately.**
2. **The industry shall operate the stripper, MEE & ATFD continuously.**
3. **The industry shall segregate the LTDS and HTDS effluents.**
4. **The industry shall provide separate water meters within one month for assessing the quantity of water consumed for process & washings, industrial cooling, boiler feed, domestic purposes etc.**
5. **The industry shall provide biological ETP & RO plant within 3 months so as to achieve Zero Liquid Discharge.**
6. **All the units of the ZLD system shall be impervious to prevent ground water pollution and construct above the ground level.**
7. The industry shall not discharge any wastewater outside the premises, on land or into any water bodies or aquifers under any circumstances and shall maintain ZLD system.

8. The industry shall collect the effluents from the production blocks through closed pipe line in lined collection tank and from there the effluent shall be pumped to the above ground level effluent storage tanks.

9. The industry shall dismantle all below ground level effluent tanks immediately.

10. The industry shall install flow meters with totalizer at the following points: a) inlet & outlet of stripper; b) outlet of MEE concentrate c) treated effluent recycling lines within one month.

11. The industry shall store HDPE drums containing chemicals / hazardous waste / raw materials on a raised concrete platform with dyke walls and leachate collection system within one month.

12. The industry shall install VOC analyzers with recording facility within one month.

13. The industry shall provide online PH measuring facility with auto recording system to the scrubbers provided within one month.

14. 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 underground pit to TSDF within 3 months.

15. The industry shall develop green belt in an area of about 3.2 acres in addition to the existing green belt of one Acre in this monsoon to achieve 33% green belt.

16. The industry shall comply the all directions issued by the Board vide order dt.11.05.2016.

17. The industry shall submit additional Bank Guarantee of Rs.3.0 Lakhs within 15 days to ensure compliance.

The Board hereby issue Extension of Temporary Revocation of Stop Production order to the industry for period upto 30.04.2017 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., 29.01.2017.

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.

Copy to:

1. The Joint Chief Environmental Engineer, A.P. Pollution Control Board, Zonal Office, Kurnool for information and necessary action.
2. The Environmental Engineer, A.P. Pollution Control Board, Regional Office, Kurnool for information and necessary action.

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

JOINT CHIEF ENVIRONMENTAL ENGINEER

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