Regd. Post with Ack Due

Order No.433/APPCB/UE-II/TF/VSP/2018- Date: 21.07.2018

DIRECTIONS


3. Minutes of External Advisory Committee (Task Force) meeting held on 03.07.2018.

WHEREAS you are operating industry in the name & style of M/s.Vishnu Chemicals Ltd., J.N.Pharma City, Parawada, Visakhapatnam for inorganic chemical manufacturing established in a site in an extent of 22.04 acres and started operations during October 2008.

WEREAS vide reference 1st cited, the industry obtained CFO & HWA of the Board vide order dated 20.06.2016 for the following products which is valid up to 31.07.2021.

<table>
<thead>
<tr>
<th>Sl.No.</th>
<th>Name of the Products and By-products</th>
<th>Total capacity after expansion</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Sodium Bichromate</td>
<td>210 MTPD</td>
</tr>
<tr>
<td>2.</td>
<td>Basic Chrome Sulphate (Co-product)</td>
<td>180 MTPD</td>
</tr>
<tr>
<td>3.</td>
<td>Yellow Sodium sulphate (By product)</td>
<td>120 MTPD</td>
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<tr>
<td>4.</td>
<td>White sodium sulphate</td>
<td>175 MTPD</td>
</tr>
<tr>
<td>5.</td>
<td>Chromic acid</td>
<td>40 MTPD</td>
</tr>
<tr>
<td>6.</td>
<td>Oxygen</td>
<td>48 TPD</td>
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</tbody>
</table>

WEREAS upon instructions of Member Secretary dated 31.05.2018, the JCEE, ZO, Visakhapatnam and EE, RO, Visakhapatnam have inspected the industry the stocks of yellow sodium sulphate which is declared to be a by-product in the production of sodium bi-chromate and basic chrome sulphate of M/s.Vishnu Chemicals Ltd., Parawada, Visakhapatnam on 01.06.2016 and furnished report vide reference 2nd cited, as follows:

- The industry is permitted to produce mainly sodium bi-chromate (120 TPD), basic chrome sulphate (180 TPD) and yellow sodium sulphate (by-product – 120 TPD) using chrome ore as the main raw material as per Board CFO dt.09.09.2008.
- As per the details furnished by the unit, it has manufactured 2,95,246 MT of Sodium Bi-chromate (SB) and generated 2,04,660 MT of Yellow Sodium Sulphate (YSS) as by – product and 2,34,253 MT of Basic Chromium Sulphate (BCS) as co-product.

- White Sodium Sulphate Production Plant:
  - As per the information of the industry representative, earlier they sold Yellow Sodium Sulphate in the market to paper manufacturing units and other BCS manufacturers. In the meantime, the Rayon manufacturer viz., Grasim industries, and the chemical manufacturers like Atul Industries, Deepak Nitrates started to produce Sodium Sulphate in large quantities as by product from their process and sold the same as white crystalline product in the market at very low prices. The industry has established 175 tons per day of WSS Plant, to convert the Yellow sodium sulphate into white sodium sulphate. This product is consumed in large quantities in the Paper, glass and detergent industry. The
industry has completed construction and obtained CFO vide order no. 7301-VSP/APPCB/ZOVSP/CFO/2016-520, dated 20.06.2016 and started trial runs for WSS from November, 2016. The industry has started commercial operation of WSS from January 2018 for export as well as domestic marketing.

- The industry has generated 2,04,660 MT of Yellow Sodium Sulphate (YSS) during the period 2008 to 2018. Out of 2,04,660 MT of YSS, the industry has sold 17,392 MT to outside parties, used 21,905 MT for captive consumption for producing 19,914 MT of White Sodium Sulphate (WSS) from November, 2016 onwards and remaining 1,65,363 Tons of YSS is stored in 14 No. of closed godowns at various places with displaying name labels.

- All the godowns where the Yellow Sodium Sulphate is stocked has been made to protect from rains and outside influence. When the shutters were opened the material was found to be in polythene bags and stocked within the godown in a secured manner. Since the yellow sodium sulphate is declared as a by-product it was presumed that the material was reached to the destination for utilization, hence there was no information on the stocks to APPCB since the industry need not file any returns. However, if the material becomes unfit for recovery then the same has to be considered as waste material for which disposal cost is very high, hence, the industry would have given information about the stocks and plan of action to APPCB.

- Some of the by-products face challenges in the market and in such circumstances the prices likely to go down drastically which made the industry unable to dispose in the market. The representative of the industry informed during inspection that they had sold the material as yellow sodium sulphate and also as white sodium sulphate for some time (year wise production table was given in the report) but due to the prevailing market conditions for the last two years they are unable to sell in the market and hence forced to stock securely since it is a valuable material for recovery.

- The industry recently entered in an agreement with M/s.Jayansree Pharma Pvt. Ltd., which is being established in APIIC, Atchutapuram for manufacturing sodium sulphate plates using yellow sodium sulphate as raw material and is expected to consume about 160 TPD. APPCB issued CFE to M/s.Jayansree Pharma Pvt. Ltd., on 12.06.2018. Further, M/s. Vishnu Chemicals Ltd., also proposed CO$_2$ acidification process by which the generation of yellow sodium sulphate can be reduced from 120 TPD to 40 TPD.

- The industry representative informed that they had plans to consume the existing stocks of yellow sodium sulphate in the godowns as well as the generated yellow sodium sulphate during the process in the plant within a span of three years. However, any market fluctuations may lead to further accumulation of yellow sodium sulphate.

WHEREAS legal hearing was conducted before the External Advisory Committee (Task Force) of A.P. Pollution Control Board in its meeting held on 03.07.2018. The representatives of the industry attended the legal hearing. The committee noted the status of non-compliance of CFO conditions. Teh EE,RO, Viskahapatnam has reported that if the material becomes unfit for recovery then the same has to be considered as waste material for which disposal cost is very high, hence, the industry would have given information about the stocks and plan of action to APPCB. The representative of the industry informed that they obtained an agreement with M/s.Jayansree Pharma Pvt. Ltd., which is being established in APIIC, Atchutapuram for manufacturing sodium sulphate plates using yellow sodium sulphate as raw material and is expected to consume about 160 TPD. Further, they also proposed CO$_2$ acidification process by which the generation of yellow sodium sulphate can be reduced from 120 TPD to 40 TPD. They had plans to consume the existing stocks of yellow sodium sulphate in the godowns as well as the currently generated yellow sodium sulphate during the process in the plant and expects to be consumed within a span of three years.

After detailed review the committee recommended to issue the directions. The Board is hereby issue 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 submit action plan for utilization of Yellow Sodium Sulphate of 164000 Tons which is stored at various locations within 30 days.
2. The industry shall submit day to day generation and usage of YSS to ZO, Visakhapatnam every month.
3. The industry shall submit the status of implementation of the forward integration projects for the consumption of YSS to ZO, Visakhapatnam every month.
4. The industry shall comply with the HWM Rules 2016 and it's amendments there off from time to time.
5. The industry shall take necessary steps to avoid any spillages at all the storage areas.
6. The industry shall ensure continuous compliance of the conditions stipulated in CFO order issued by the Board.

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., 21.07.2018.

Sd/-
MEMBER SECRETARY

To
M/s.Vishnu Chemicals Ltd.,
J.N.Pharma City,
Parawada,
Visakhapatnam – 531021.

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