



केन्द्रीय प्रदूषण नियंत्रण बोर्ड
CENTRAL POLLUTION CONTROL BOARD
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय भारत सरकार
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE GOVT. OF INDIA

SPEED POST

B-29016/04/07/IPC-I/

December 14, 2018

To

The Regional Director
Zonal office (South)
Central Pollution Control Board
1st & 2nd Floors, Nisarga Bhavan
A-Block, Thimmaiah Main Road,
7th D Cross, Shivanagar, (Opp. Pushpanjali Theatre)
Bengaluru-560010 (Karnataka)

Sub: Inspection of M/s Manali Petrochemicals Ltd. (Plant II), Manali,
Tamil Nadu - 600068- reg.

Ref: CPCB direction issued u/s 5 of E(P) Act 1986 dated November 22,
2018 to the Unit M/s Manali Petrochemicals Ltd. (Plant II), Manali,
Tamil Nadu -600068- reg.

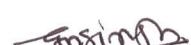
Sir,

This has reference to the direction (notice) issued u/s 5 of Environmental (Protection) Act, 1986 on November 22, 2018 to the Unit M/s Manali Petrochemicals Ltd. (Plant II), Manali, Tamil Nadu- 600068. The Unit has submitted compliance report (enclosed).

It is, therefore, requested to inspect the unit, verify the compliance of direction and submit the report to this office positively by December 31, 2018.

Yours faithfully,

Encl: as above


(Gurnam Singh)
Addl. Director & I/C IPC-I

Copy to:

1. I/c IPC-VI


(Gurnam Singh)

Ref: MPL/CPCB/2018-19

Manali Petrochemicals Limited - Plant II
Sathangadu Village, Manali, Chennai - 600 068.
Phone : 044-25941034, 1557
Fax : 044-25941199

10th December 2018

The Chairman

Central Pollution Control Board

Parivesh Bhavan

East Arjun Nagar

New Delhi 110 032

Sir,

Sub: Directions under section 5 of the Environment (Protection) Act, 1986—Notice

Ref: B-29016/04/06/IPC-I/ Dated November 22, 2018 &

We acknowledge receipt of your letter-29016/04/06/IPC-I/ Dated November 22, 2018 on 30th November 2018 through e-mail pointing out certain alleged deficiencies in relation to sludge disposal and the stack emissions. In this regard we wish to submit that we have taken necessary actions in the matter as detailed below:

1. Sludge drying bed constructed using lime as an alternative arrangement.

We have improved the effluent treatment process and are now using advanced bio treatment process which has been commissioned and put to continuous use, achieving the required results. In this process secondary clarifier bottom (MLSS) is recycled to the maximum extent and the same is maintained in the bio reactor. Further the excess bio sludge is now filtered through the new Plate and Frame Press installed and commissioned recently, separating the sludge from the filter and the effluent liquid is routed to the Treated effluent storage tank.(Filter press Photo-Annexure 1)

It is submitted that during the implementation and stabilization of the above, some quantity of the sludge had to be stored in the pit which was mentioned during the CPCB team's visit and has since been recovered and the lime is being removed for dismantling the pit.

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2. The porthole location of Boiler stack was found lesser than 8 times of stack diameter.

At present the porthole is close to 6-7 times the stack diameter, falling short the stipulated height by about 15%. We have modified the Porthole location to comply with 8 times the stack height and new sample porthole is provided as per your mentioned requirement and completed necessary photos attached for your reference (Annexure-2) and now we are erecting the platform facilities for easy approach. The same will be completed positively within a month from this date. In this connection we wish to submit that we are in the process of switching over from Furnace Oil to LNG to be supplied by IOCL in our area. For this purpose new LNG firing burners have been ordered and received and awaiting commencement of the LNG supplies. It has been informed that header laying work is in progress and the LNG supplies expected shortly

3. Exceedance of concentration of PM parameter 212 mg/Nm3> 100mg/Nm3.

During inspection of the CPCB Team on September 25, 2018 stack monitoring tests were conducted by SMS Laboratories, Chennai, a laboratory approved by MoEF/CPCB in the presence of the CPCB team itself. From the attached report (Annexure 3) it could be seen that the PM in the stack was 42.2 mg/Nm³, well within the prescribed parameter.

We are attaching the PM values from online monitoring on 25th September 2018 during the sampling timings for assuring that the values have not exceeded the prescribed limits.

We wish to submit that the PM values are connected to the CARE-AIR Centre and the values recorded in OECMS and we are monitoring continuously. We are also attaching the recent TNPCB mobile air monitoring results taken on 12-10-2018. (Annexure -4) It may be seen that the PM values (48 mg/Nm³) was well below the prescribed limits. Based on your direction letter Dated November 22, 2018 again stack monitoring carried out on 05.12.2018 by SMS Laboratories, Chennai, this stack monitoring report is also attached for your reference .(Annexure-5)

We assure you Sir that we are closely monitoring the emission values and from the relevant reports it could be observed that both the stack emissions and PM are within the prescribed standards. Unfortunately we failed to communicate back to you during the July 30th CO exceedance alarm message since the SMS alerts from CPCB server had been sent to G. Balasubramarium who had left the company on retirement on 31-05-2018. We are attaching the communication mail regarding the request for change of alert message mapping sent in September 2017 for updation (Annexure 8). We have again sent the updation of the contact Mail and Phone No for SMS alerts. Subsequently we received a mail from TNPCB server on 19th August regarding the CO exceedance which was due to the cable fault from Instrument to

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TNPCB server, while actually there was no exceedance. We have submitted the alarm summary reports in our monthly TNPCB report in August and September (Annexure 6&7).

We intimated for Updation of Occupier details in September 2017 and also during the OCEMS registration and was informed that we could change the details only after registration which was completed on 27th July. We have communicated after the registration for change of the contact details.

We assure you Sir's that we are fully conscious of our responsibility for protecting the environment and done all that is required for the same. We have not violated any conditions. There is no exceedance in any of the parameters and we are compliant with all the requirements. After all the efforts put up on our side to accomplish all the requirements and after achieving all the fruitful results of 100% compliance if any adverse action is taken against us, the same will cause irreparable hardship and prejudice to the ongoing production activity.

We request you to consider our reply and in the light of the same, we request you to drop the proceedings based on the Showcause Notice received Via Mail on 30th November 2018(B29016/04/06/IPC-I/Dated November 22, 2018). In this context we humbly submit for consideration and allow us to run the facility in the interest of all.

Thanking you,

Yours faithfully

For Manali Petrochemicals Limited-Plant-II

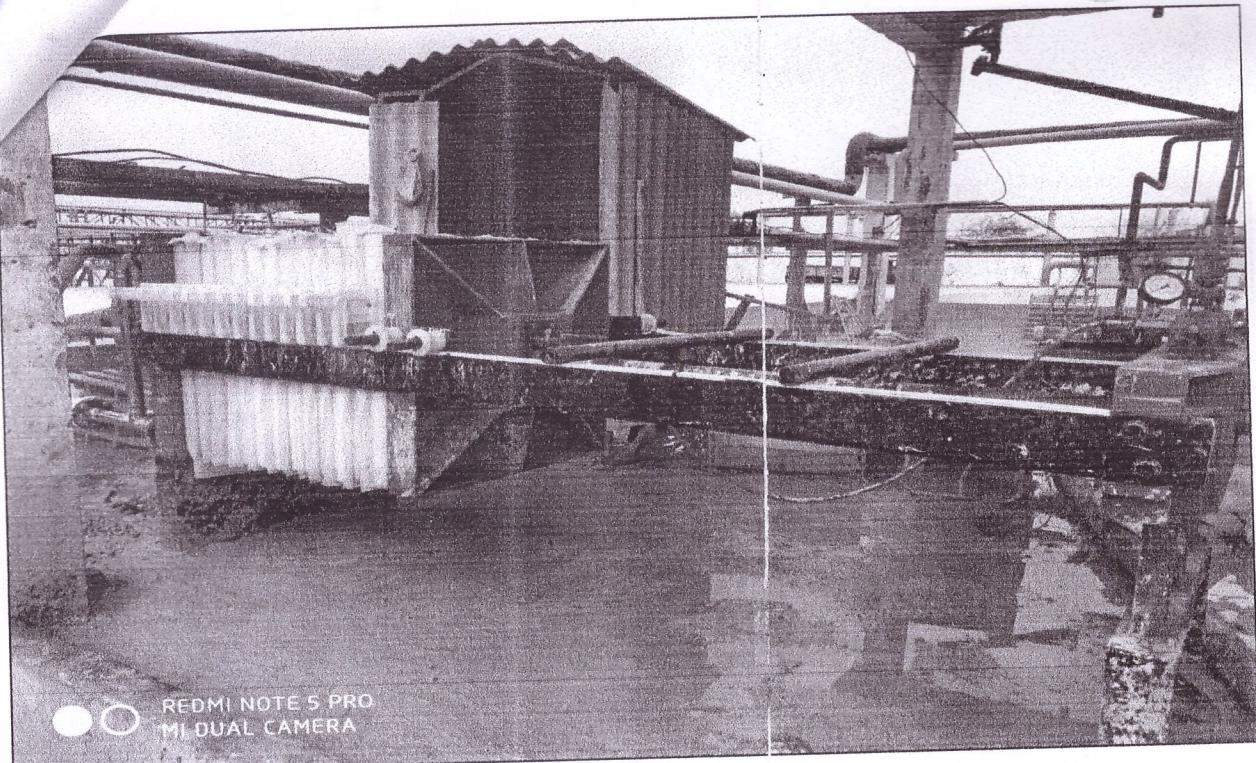
C.S.C.B

C.SUBASH CHANDRA BOSE

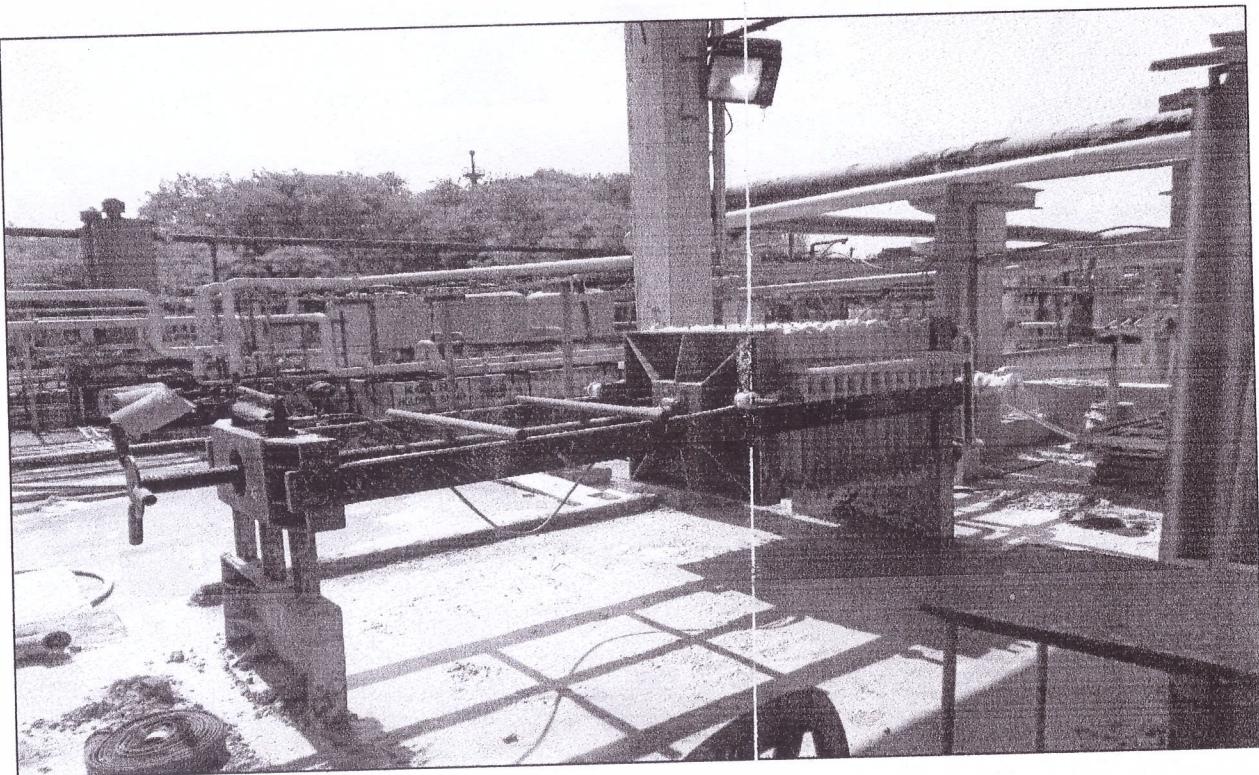
DIRECTOR (WORKS)

Encl.: As stated

Annexure - ①



SECONDARY CLARIFIER BOTTOM PLATE & FRAME FILTER PRESS



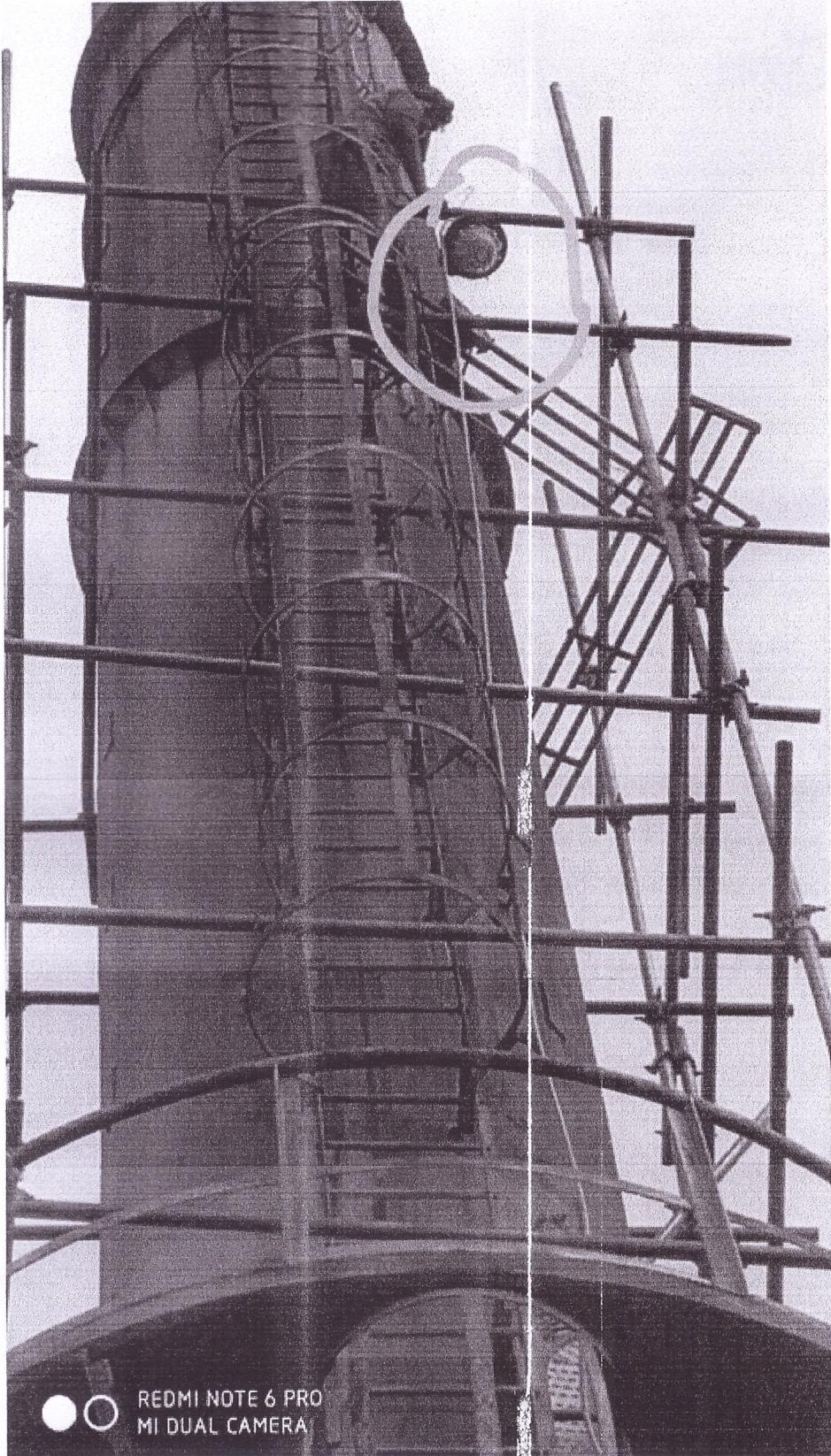
SECONDARY CLARIFIER BOTTOM PLATE & FRAME FILTER PRESS



**SECONDARY CLARIFIER BOTTOM PLATE &
FRAME FILTER PRESS WITH CAKE DISCHARGE**



**SECONDARY CLARIFIER BOTTOM PLATE &
FRAME FILTER PRESS WITH CAKE DISCHARGE**



BOILER NEW SAMPLE PORT HOLE PROVIDED AT 8 TIMES STACK DIAMETER

ANNEXURE IV

Annexure - 4

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TAMILNADU POLLUTION CONTROL BOARD
District Environmental Laboratory, Manali

STACK MONITORING SURVEY – Report of Analysis

Report No.44/SM/2018-19

Date : 29.10.2018

1. Name of the Industry : M/s MPL - II,
2. Address of the Industry : Manali, Chennai – 600068.
3. Date of Survey : 12.10.2018

Stack Monitoring Survey Results

| Sl. No | Stack attached to | Fuel used | Stack Temp K | Velocity in (m/sec) | Discharge rate in (Nm ³ /cay) | PM | SO ₂ | NO _x |
|--------|--------------------|-----------|--------------|---------------------|--|----|-----------------|-----------------|
| 1. | Boiler – New (25T) | FO | 454 | 18.57 | 854233 | 48 | 311 | 33 |
| 2. | DG – 1500 KVA | HSD | 538 | 31.57 | 27582 | 16 | 5 | 297 |

L. Subramanian
Dy. Chief Scientific Officer
DEL-Manali
31/10/2018

Anne - 5 46

SMS LABS SERVICES PRIVATE LIMITED

TEST REPORT

Physical
Chemical
Biological
Mechanical Test

Report No:SEN/18120054-01

Report Date:06 Dec 2018

| | | | | |
|--------------------|---|---------------------|-------------|--|
| Customer Name | MANALI PETROCHEMICALS LIMITED. | | | |
| Customer Address | Ponneri High Road, Manali, Chennai-600 068 | | | |
| Sample Description | Stack Monitoring | | | |
| Reference | Test Request Form Dated 05.12.2018 | Sampling Date | 05 Dec 2018 | |
| Sample Condition | Fit for Analysis | Sample Received on | 05 Dec 2018 | |
| Sampling Procedure | SMSLA/EN/SOP/111 | Test Started on | 05 Dec 2018 | |
| Sampling Location | Boiler Stack - Plant-II, Sathangadu Village, Manali, Chennai - 68 | Test Completed on | 05 Dec 2018 | |
| Diameter of Stack | 1.5m | Ambient Temperature | 33°C | |

Test Results

| S.No | Parameter | Test Method | Unit | Results | Limit as per CPCB |
|-----------------|--------------------|---------------------|--------------------|---------|-------------------|
| Chemical | | | | | |
| 1 | Particulate Matter | IS 11255 (Part - 1) | mg/Nm ³ | 22.9 | * |

*Note: Less than 2 (Ton/Hour) :1200 mg/Nm³
 2 to Less than 10 (Ton/Hour) :800 mg/Nm³
 10 to Less than 15 (Ton/Hour) :600 mg/Nm³
 15 and Above (Ton/Hour) :150 mg/Nm³

*****End of Report*****

Page No: 1 of 1


R. IYAPPAN
 Authorised Signatory

R. IYAPPAN
 Sr Executive-Chemical

39/6, Thiruvallur High Road, Puduchatram Post, Thirumazhisai Via, Poonamallee Taluk,
 Chennai - 600 124. Phone : 044-26811662 - 664

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