



**SPEED POST**

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

December 10, 2018

To

✓ The Regional Director,  
Regional Directorates,  
Central Pollution Control Board  
Parivesh Bhawan, Opp VMC Ward office no 10  
Subhanpura Vadodara-390 003

**Sub: Re-inspection of M/s Krishna Antioxidants Pvt. Ltd, Unit-I & II, Dist. Ratnagiri, Maharashtra- reg.**


This has reference to the Complaint received from Ministry of Environment Forest and Climate Change against M/s Krishna Antioxidants Pvt. Ltd. located in Maharashtra.

In this regard, CPCB Regional Directorate, Vadodara inspected the unit's M/s Krishna Antioxidants Pvt. Ltd, Unit-I & II, Dist. Ratnagiri, Maharashtra on August 07-08, 2018 for verification of compliance. CPCB has issued show cause notice to Unit I and a letter to Unit II. Response received from both the units. (copy enclosed)

In view of above, you are requested to re-inspect the both Unit-I & II and submit the inspection report to head office by December 30, 2018.

Enclosed: As above

Yours faithfully

  
(Gurnam Singh)  
AD & I/C IPC-I

**Copy to:**

1. PS to MS : For Information

  
(Gurnam Singh)

Date: 23/11/2018

To,  
Mr. S.P. Singh Parihar  
Chairman  
Central Pollution Control Board,  
Ministry of Environment, Forest and Climate Change  
Government of India

Address  
Parivesh Bhawan, East Arjun Nagar,  
Delhi-110032.

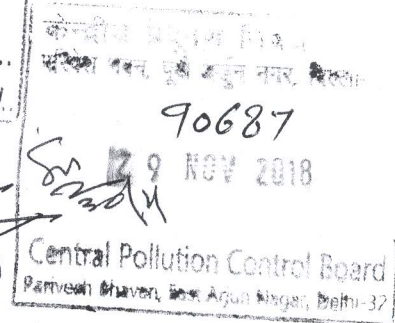
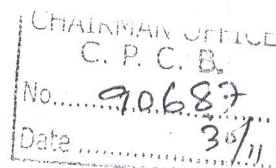
Ref: Your letter dated 26/10/2018 bearing No. B-29016/04/07/IPC-I/12313

Sub: Compliance of directions under Section 5 of the Environment (Protection) Act,  
1986 -Notice

Dear Sir,

We have received your directions u/s 5 of Environment (Protection) Act, 1986 dated  
26/10/2018 bearing No. B-29016/04/07/IPC-I/12313 on 15.11.2018. In respect of the  
same we would like to state as under:-

1. M/s Krishna Antioxidants Pvt. Ltd. (for short "Company") in in the business of manufacturing of specialty chemicals. The Company is running 3 factories located at Plot A-1, A-13 at MIDC, Gane Khadpoli, Chiplun, Dist -Ratnagiri & Plot No B23/24 MIDC Lote Parshuram, Tal Khed, District-Ratnagiri, and Maharashtra. The factory at Plot No.A-1 has been operational from 17.05.2014 factory at A-13 has been operational from April 1992 and factory at Plct No. B23/24 has been operational from Aug 2014 All the said factories are been set up and are running in adherence to all applicable laws including environment related as well as fire safety. Except fire at in Plot No.A-1 on 02/03/2018 there have beer no untoward incident in the said factories till date.
2. The Complainant Shri. Santosh Balwani is not a resident of nearby area. He has never approached the Company till date with any grievance regarding operation of the said factories. The reason as to why and what locus Sari. Balwani has filed the Complaint with the Central Pollution Control Board is not known to us. It is our humble opinion that, under such scenarios and without verifying the *bonafides* of Complainant no





Complaint ought to be taken on record or acted upon. Therefore, at the outset such a Complaint ought not to have been entertained.

3. The issuance of the said directions is itself an indication of the fact that the activities of the factories of the Company in the opinion of CPCB are not likely to cause any grave injury to the environment. The observations made by the team of officials from CPCB, Regional Directorate, Vadodara are in terms of enhancing of adequacy of the various environmental protection and fire hazardous norms in the factory located at Plot No. A-13. We appreciate the steps taken by the CPCB in enlightening us with methods to improve environmental and fire safety. Since, the inspection was conducted in the factory located at Plot No. A-13, our para-wise responses herein below are limited to the said factory alone.
4. In respect of Para No.1 and 2, it is a fact that there was an incident of fire in the factory at Plot No. A-1 on 02/03/2018. The fire was doused with the help of fire brigade, fire tenders from neighboring industries, police officials, officials from Collector's office and local population. Post the incident of fire the Company has taken various steps as mentioned below to further secure the factory from fire incidences.
  - Firefighting arrangement strengthening has been done by keeping fire extinguisher of different types such as Foam fire extinguisher, Dry Chemical powder fire extinguisher, CO2 Fire extinguisher.
  - Besides this fire hydrant system with 2 Lakh liters water is available for firefighting. Firefighting foam 3000 liters has been made available near fire hydrant pump house.
  - For fire detection smoke detection system has been installed as per requirements of fire dept.
  - Final Fire NOC has been obtained for A1 from the Maharashtra Industrial Development Corporation (Competent Authority), which certifies the firefighting adequacy installed in the said factory. Copy of the Final Fire NOC is annexed hereto and marked as Annexure-"A".

5. In respect of Para No.3, it is stated that single stage effect evaporator has been installed for reject water treatment and double effect evaporator erection is currently under progress. The installation is likely to be completed on or before 31.12.2018.
6. In respect of Para No.4, it is stated that spillages occurring inside the factory premises are cleaned regularly. CT (Water) Recirculation gland leakage has been attended to and the concerned machinery has been appropriately rectified. Leakage at the Styrenated phenol pump, has been attended to and appropriate measures have been taken. As an added measure of safety, preventive maintenance schedule has been prepared and is being implemented to prevent leakages and/or to quickly attend to any such leakages in the future.
7. In respect of Para No.5, it is stated that ETP Sludge drying bed leachate collection system has been provided and a pump has been installed to transfer the leachate to ETP.
8. In respect of Para No. 6, it is stated that leachate and seepage collection system has been provided in the hazardous waste storage shed. Waste kept outside area shifted to waste shed. Leachate lying in the nearby low lying area has been shifted inside the waste shed.
9. In respect of Para No.7, it is stated that separate area is made available for spent solvent drums and appropriate identification labels have been fixed on every used drums.
10. In respect of Para No.8, it is stated that vent along with stack monitoring facility has been provided to the scrubbers.

We would also like to state that the factory at Plot No. A-13 has been granted various Certificates such as ISO 45001:2018; Occupational Health and Management System; ISO 14001:2015, Environmental Management System; ISO 9001:2015, Quality Management System, Good Manufacturing Practices, which shows the commitment of the Company towards adhering to not only legal but global standards towards health, safety and environmental management.

The factory has also been granted consent to operate by Maharashtra Pollution Control Board dated 17/04/2018 valid till 30.09.2020. Factory license has been granted by



Department of Industrial Safety and Health, Government of Maharashtra w.e.f. 01.01.2019 valid till 31.12.2022. The Company is providing gainful employment to over 300 number of workers at the said factories.

Received National Level SURAKSHA PURASKAR (Bronze Trophy) for the year 2016 and Silver Trophy for the year 2017 from National Safety Council for implementing effective OSH Management Systems, Practices & procedures.

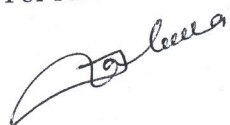
Evidently, the Company has complied with not only all the applicable environmental and safety norms under the applicable statutes but has also adhere the global standards. Looking at the track record of the Company, it is our humble opinion that work stoppage order should not been issued against the Company, as it would detrimental to the future of industry in region in general and workers of the factory in particular.

In the event you are not satisfied with submissions made hereinabove we implore you to kindly give us a personal hearing so that we may submit information of the documents as may be necessary to put forth our stand.

Thanking you,

Yours Faithfully,

For Krishna Antioxidants Pvt. Ltd.

  
T. RAHMAN  
DIRECTOR OPERATIONS

**Encl:**

1. Proof of all compliances as mentioned above,
2. Consent to operate from MPCB,
3. Factory License from DISH,
4. Fire NOC from MIDC
5. ISO and GMP Certificates
6. National Level Suraksha Purskar from National Safety Council.

CC to:

1. **Sh. Hardik Shah**  
Private Secretary to Minister  
Environment, Forest and Climate Change, Govt of India  
Paryavaran Bhavan, Jorbagh New Delhi - 110003

AD (DH)  
JRR (AM)  
6/11  
23/11/18  
Date: 05-11-2018

To,  
Gurnam Singh,  
(Additional Director & I/C IPC-I)  
CENTRAL POLLUTION CONTROL BOARD  
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE GOVT.OF.INDIA

Ref: Your letter B-29016/04/07/IPC-I / [220] dated 26 October, 2018


**Sub: Corrective Action**

Respected Sir,

We are taken corrective action as you mentioned subject in your letter during a visit to our plant, also attached photographs for your ref.

1. Firefighting is provided in both plots, B-23 & 24 with Water cap-2.5 lakh liter and Foam (2000Lts) , CO2 , Chemical powder also placed in different area .(Ref-Photos 1,2,3,4,5)
2. Action is taken on spillages near Blender -I , High vacuum pump(Ref photos)and also process plant first floor with replacing manual process to automatic process.
3. Sludge drying bed is operated well an effectively ,our generation of sludge from ETP, plant is below 5 Kg/day total volume of bed is 2M<sup>3</sup> .
4. We provided proper vent along with stack monitoring facility for the scrubbers.
5. The drainage system to Avoid contamination of storm water is constructed .

Yours's Faithfully ,

**ASHOK PATIL**  
  
(VP WORKS)

**KRISHNA ANTIOXIDANTS PVT LTD**