

**BEFORE THE NATIONAL GREEN TRIBUNAL,
SOUTHERN ZONE, CHENNAI**

Original Application No. 121 of 2021 (SZ)

In the matter of:

Tribunal on its own motion – SUO MOTU based on the
New Item published in The Hindu Newspaper, Chennai Edition,
Dated: 14.05.2021, under the caption “Cuddalore pesticide
Unit blast kills 4”

...Applicant

Versus

The Chief Secretary to Government of Tamil Nadu & Ors.

...Respondents

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Certified to be the true copies of the respective Originals

Dated at Chennai on this the 21st day of December, 2021

T. Jayaram

Counsel for the 8th Respondent

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...Respondents

**REPLY AFFIDAVIT ON BEHALF OF CRIMSUN ORGANICS PVT. LTD.
(RESPONDENT NO. 8), TO THE REPORT OF JOINT COMMITTEE.**

I, Senthurpandian Rameshprabakaran, aged about 55 years, s/o Shri Senthurpandian, Managing Director of Crimsun Organics Pvt. Ltd. having its registered office at C-9, C-10 & C-11 SIPCOT Industrial Complex, Kudikadu, Cuddalore-607005 Tamil Nadu, do hereby solemnly affirm and state as under: -

1. That I am the Managing Director of M/s. Crimsun Organics Pvt. Ltd. (“Respondent No. 8”)
2. That vide Board Resolution dated 07.07.2021 of the Board of Directors of Respondent No. 8, I have been duly authorized to, *inter-alia*, file this Affidavit on behalf of Respondent No. 8. A copy of the said Board Resolution dated 07.07.2021 is annexed hereto as **Annexure - A**.
3. Vide corrected Order dated 04.06.2021 (uploaded on the official website of the Hon’ble Tribunal on 17.06.2021), this Hon’ble Tribunal was pleased to take *suo-motu* cognizance of a media report dated 14.05.2021 published in

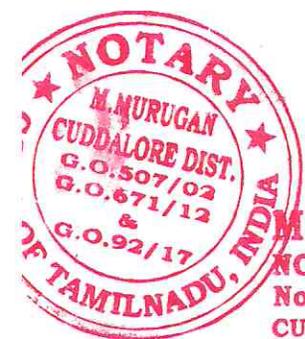
Signed Before me

M. Murugan 18/12/2024 1

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For CRIMSUN ORGANICS PRIVATE LIMITED,

S. RAMESH PRABAKARAN,
MANAGING DIRECTOR.



The Hindu, Chennai Edition, under the caption “Cuddalore pesticide Unit blast kills 4”. The Hon’ble Tribunal issued notice to, inter-alia, Respondent No. 8.

4. The Hon’ble Tribunal vide the same order dated 04.06.2021 constituted a Joint Committee consisting of (a) the District Collector, Cuddalore; (b) a Senior Officer from Tamil Nadu Pollution Control Board (“TNPCB”); (c) a Senior Officer from the Central Pollution Control Board (“CPCB”); and (d) a Senior Officer from the State Industries Promotion Corporation of Tamil Nadu (“SIPCOT”). The Hon’ble Tribunal further directed the Joint Committee to, *inter-alia*, submit a factual as well as action taken report in respect of the incident in question.
5. The Joint Committee submitted its final report dated 27.11.2021 before this Hon’ble Tribunal, which was uploaded on the website <https://greentribunal.gov.in/> on 29.11.2021 (“said Report”).
6. The present affidavit is being filed by Respondent No. 8 in response to the said Report of the Joint Committee.

A. ABOUT RESPONDENT NO. 8 AND THE UNIT IN QUESTION: -

7. M/s Crimsun Organics Private Limited was established in 2016 as a manufacturer of speciality chemicals and agro-chemical products, with its manufacturing facility in Cuddalore in the state of Tamil Nadu.
8. Respondent No. 8’s manufacturing facilities are located at C-9, C-10 & C-11, SIPCOT Industrial Complex, Kudikadu, Cuddalore, Tamil Nadu. Respondent No. 8 manufactures, inter-alia, Fipronil and Acetamiprid Technical at this state-of-the-art manufacturing plant located at C-10 (“said unit”).
9. A total of approximately 200 employees are dependent on the said unit, for their livelihood.


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10. Respondent No. 8 has established a pre-university course tuition centre to promote universal education among around 65 underprivileged children, most belonging to MBC and SC communities. Further, with an aim to strengthen and revitalize the rural government schools in Cuddalore, Respondent No. 8 has provided the schools with adequate sanitation and basic amenities like clean toilets, regular and clean water supply, proper sanitation and basic amenities like clean toilets, regular and clean water supply, proper lighting and fans etc.
11. In addition to the above, Respondent No. 8 has also initiated a sports club at the centre as well as a free library at Kudikadu Village situated adjacent to the unit. Respondent No. 8 has also provided 6.7 lakhs for the promotion of the sports infrastructure development at Anna stadium Cuddalore.
12. Pertinently, some of the important safety measures taken by Respondent No. 8 at the said unit are as under : -
- (a) "Instrument and Safety devices" testing and calibration practices are clearly written down as standard operating procedures, maintenance management, checklists and records and being carried out by both internal / external domain competent persons.
 - (b) Examination of devices used in the process are tested before taking into use and also after carrying out any major repair. The testing is done by approved competent person at pre-defined periodical intervals.
 - (c) Examination of all the pressure vessel in the factory is being done by Jt. Director of Safety and Health at the specified time intervals.
 - (d) Examination of all other vessels wherever applicable hydro, pneumatic and ultrasonic thickness tests are conducted by internal/external competent persons, at the pre-defined periodicity.
 - (e) Respondent No. 8 also follows a Preventive maintenance management system (PMS) which is based on the concept of impact


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or consequence of failure of equipment on safety, environment, quality and financial loss. Higher the gravity of consequence, greater the level of monitoring.

- (f) People with minimum B.Sc/ Diploma in Chemical technology are engaged by Respondent No 8 for the operation of the plant equipment. And they are being supervised round the clock by experienced chemical engineers with a minimum qualification of B.E. (Chemical).
- (g) Well documented standard operating procedures (SOPs) are available with Respondent No. 8 for all critical operations and only qualified (Min B.Sc Chemistry / Diploma in Chemical Technology) and trained operators are employed for all the production operations.
- (h) For ensuring the safety of the people and the plant, safety management systems are being effectively implemented and followed. In order to ensure effective establishment and implementation of the safety system, a Manager having M. Tech Degree and experience of over 20 years and a senior safety officer having M. Tech Degree and a total experience of around 7 years in chemical industry have been employed by the Respondent No. 8. Additionally, 4 safety stewards have also been employed and deputed by Respondent No. 8 to the production block round the clock.
- (i) Equipment are overhauled, repaired and replaced based on their conditions observed during periodic preventive maintenance checks. All the repaired equipment depending on the safety impacts, are tested thoroughly, before lining up for process use, for e.g. Hydro test, pneumatic test, water run, nitrogen purge, etc. Such records are maintained by Respondent No. 8. Pre-start up safety review (PSSR) procedure is in place to ensure that all the new or modified


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equipment before taken into operation are inspected by a cross functional team and all the points related to its safe operation is checked and completed.

- (j) A full-fledged maintenance team comprising of a Senior manager (B.E.Mech) with 35 years of industrial experience, a team of four Mechanical engineers, two Electrical engineer, one Instrumentation engineer and one Process engineer (all B.E. graduates) are employed.
- (k) Hazard and Operability Study (HAZOP) Study is being carried out for all the chemical manufacturing processes used in the plant, to identify hazards, evaluate the risk and appropriate risk mitigation measures taken before commencing the operation.
- (l) Change Control management system is put in place wherein all the changes related to the operations, plant equipment, utility section etc. are initiated with a change control management document. It is evaluated by a cross functional team and implemented only after approval of the head of Quality Assurance Department.
- (m) Possible emergencies are already identified, through safety risk analysis, both related to process and maintenance and necessary mitigation measures are taken.
- (n) A detailed procedure on Onsite Emergency and Disaster Management was submitted by Respondent No. 8 on 01.09.2020 to the Deputy Director, Industrial Safety & Health, Cuddalore.
- (o) Rehearsal of Emergency mocks are conducted from time to time and deficiencies are documented and corrected.
- (p) Respondent No. 8 has constituted a Safety Committee headed by its Director operations, and having Head Safety, Head production, Head Maintenance and operation level, representative from each function viz. production, maintenance, purchase departments and also


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representative from workers. Quarterly meetings are conducted regularly. Minutes of the meeting are prepared and agreed action plans are implemented for the improvement of safety.

- (q) Respondent No. 8's Health & Safety policy was prepared based on the premise of general duties of manufacturers as outlined in the Factories Act, 1948. True copy of the Health, Safety and Environment Policy of Respondent No. 8 is annexed hereto as **Annexure-B.**
- (r) Respondent No. 8 has a well-maintained Occupational Health Centre with 24 hours duty by medical attendants / nurses and an ambulance on stand-by.
- (s) Infrastructure like, Oxygen cylinder (one in OHC & one in ambulance), Oxygen concentrator, bed for patient, blood pressure meter, first aid medicines, dressing bandages, etc. are available and maintained appropriately.
- (t) Respondent No. 8 has retained Alfa care Hospitals, Cuddalore, with a qualified medical practitioner, to medically examine its workers employed in hazardous process periodically as stipulated under the provisions of the Factories Act, 1948 and to carry out the pre-employment examination to ensure fitness of new entrants. In addition to that all the employees are medically examined for their annual health check-up.
13. In order to operate the said unit, Respondent No. 8 has obtained all necessary licenses under various legislations such the Insecticides Act, 1968, Environment (Protection) Act, 1986, Factories Act, 1948 etc.

B. INCIDENT IN QUESTION AND CAUSE THEREOF: -

14. The incident in question took place on 13.05.2021 at around 7.40 am, at the 2nd floor of Respondent No. 8's production block located at C-10, SIPCOT Industrial Complex Kudikadu Village, Cuddalore, Tamil Nadu.


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15. The said Report at para 4.6 refers to the possible causes of the incident. Respondent No. 8 is, therefore, setting out below brief particulars about the incident and probable cause thereof as found after investigation.

The incident and probable cause are as under : -

16. At the time of the incident on 13.05.2021, the said unit was involved in the manufacture of two products, namely Fipronil and Acetamiprid Technical.
17. In the distillation kettle, R-108, the recovery of solvent (Isopropyl Alcohol) was being carried out from the mother liquor received from Acetamiprid process.
18. Respondent No. 8 had submitted the following incident report to various authorities: -

“On 13.05.2021 at 2 AM, the IPA recovery operations completed and steam to the reactor limpet coil was closed in the night shift on 13.05.2021 and kept the stirrer in on condition. Once the residue temperature comes to about 60°C, it was planned to drain the residue during general shift hours.

The next day morning 13.05.2021 at around 7:30 AM, A-shift chemist, who was operating the nearby reactor, noticed some smell coming from the reactor and informed to the Shift In-charge. Immediately Shift in-charge came to the spot and noticed fumes coming from the reactor(R-108) manhole cover. So, he tried to apply cooling water to the reactor(R-108) limpet coil.

At that time, he saw fumes more fumes started coming from the reactor manhole cover flange joint and also oil started spilling from the Mechanical seal lubricating oil hose. Hence, he could not open the cooling valve and move away from the place. Around 7:40 AM, with dense white fumes came out as the manhole cover as it got opened.

All the employees & plant helpers who were working, 2nd floor, 1st floor and the ground floor came down to the ground floor open area.


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However, 2 employees and plant 4 helpers (casual labors) who were, working on the third floor went to the terrace. In that one employee and three helpers, who again attempted to come down fainted near to the terrace staircase. They all were evacuated from the site and taken to hospital, where all the four of them passed away. Rest of the 2 people, who were staying near the terrace water tank, came down at around 7:50 AM when the fumes subsided.

.....

Preliminary investigation indicates the problem probable cause of the incident could be as malfunction of low-pressure steam system valve, which could have led to the pressure raise in the reactor and hence the leakage of the fumes. Detailed investigation is being done”

A copy of one such incident report dated 15.05.2021 submitted by Respondent No. 8 to DISH on 22.05.2021 is annexed hereto as **Annexure -C.**

C. STEPS TAKEN BY RESPONDENT NO. 8 IMMEDIATELY AFTER THE INCIDENT:

19. As soon as the incident occurred, Respondent No. 8 took immediate steps to cut the electrical power to the plant.
20. Respondent No. 8 also immediately called for the fire tender from SIPCOT fire service station that reached the said site at 7.50 am on 13.05.2021.
21. Minor fire caused was brought under control using fire extinguishers and connecting foam nozzles in the fire hydrant hoses on solid fires using fire hydrant water.
22. At the time of the incident, 15 personnel were present at the said site and after that 11 people came out of the plant safely. One safety steward rushed to the scene to rescue the remaining four persons. These four persons were


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taken to District Government Head Quarter Hospital, Cuddalore and unfortunately lost their lives.

23. For the remaining 12 persons, Respondent No. 8 took the following steps:-
- (a) shifted them from the site of the incident to a place with fresh air;
 - (b) provided shower wash for 10-15 minutes;
 - (c) removed all the contaminated clothes;
 - (d) eyes of all the 12 persons were given a thorough wash;
 - (e) checked for the level of consciousness and level of oxygen;
 - (f) provided for 8 litres of oxygen to be given through face mask to treat any breathing difficulties;
 - (g) For skin irritation and blisters 2.5% gluconate gel was applied after thorough wash.
24. Pursuant to the above measures, Respondent No. 8 proactively rushed the 12 personnel to Government Head Quarters Hospital, Cuddalore.
25. Out of the 12 persons, one person with injury in the hand was referred to Mahatma Gandhi Medical College and Research Institute, Puducherry. The other 11 were kept under observation for approximately 48 hours, thereafter the hospital was requested to release them on request for further precautionary investigation in other hospitals.
26. Immediately after taking on request discharge from the Government Head Quarters Hospital, Cuddalore, these 11 personnel were admitted to three other hospitals. They were then discharged from the said hospitals after it was found that there was no adverse impact on the health of these personnel from gas inhalation.
27. It is submitted that expenditure for the treatment of the injured persons was borne by Respondent No. 8 and all injured persons are in good health.

D. CONTAINMENT MEASURES: -

28. In order to douse the fire on the day of the incident i.e., the following number, type and quantity of fire extinguishers were used at the said site:-


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| List of Fire Extinguishers used during the Incident Day (13.05.2021) | | |
|---|--|------------|
| S. No | Description | Qty |
| 1 | CO2-(6.5 kg) | 1 |
| 2 | CO2-(4.5 kg) | 1 |
| 3 | ABC-6 kg (Mono Ammonium Phosphate) (Powder) | 9 |
| 4 | Dry Chemical Powder -6kg (Sodium Bi carbonate (Powder) | 7 |
| 5 | Dry Chemical Powder -9kg (Sodium Bi carbonate (Powder) | 1 |
| 6 | Self-Containing Breathing Apparatus (Air) | 3 |
| 7 | Aqueous Film Forming Foam can 60 Lit | 3 |
| 9 | Water Used from COPL reservoir in KL | 5 |

29. When the fire tender arrived at the site, it first used Respondent No. 8's fire extinguishers to douse the small fires at the various locations of insulation. The water from the fire tender was used only to cool the drums containing solvents present near to the incident site.
30. Apart from the fire extinguishers mentioned in the above table, about 4.5 kl of water and 0.5 kl of foam was used by the fire service team.
31. Pertinently, Respondent No. 8 already has facilities to ensure that the water and washing waste from the production area (the said site) is collected and transferred to Effluent Treatment Plant. This was effectively done after the incident. Hence, no water pollution was caused at the said site due to the incident.
32. Further, since the fire was restricted to the production area, no soil pollution was caused due to the incident. However, as a precautionary measure, the company proactively took the initiative and deputed GLENS Lab (NABL


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Accredited laboratory) to collect homogenous samples from all around the production block in order to verify the impact of the incident including from use of the fire extinguishers, on the soil around the production block. Respondent No. 8 craves leave of this Hon'ble Tribunal to produce the analysis report prepared by GLENS lab when so directed by this Hon'ble Tribunal.

33. Furthermore, as regards release of substances in the air, the quantity of release of gases were so minimal that it did not get recorded in any of the Ambient Air quality monitoring stations, including the one provided in TNPCB office, situated at a distance of about 300 meters from the said unit. In this regard, copy of TNPCB's Report with respect to Ambient Air Quality on 13.05.2021 has already been filed as Annexure-5 to the preliminary report of the Joint Committee.
34. Even in TNPCB's subsequent report filed pursuant to Order dated 29.10.2021 of this Hon'ble Tribunal, TNPCB has stated that there was no significant rise in the levels of gases between 6AM – 6PM on 13.05.2021 and the parameters are within the National Ambient Air Quality Standards prescribed by CPCB.
35. It is submitted that the Joint Committee has computed an amount of Rs. 5,89,690/- towards environmental damage caused due to release of pollutants in the atmosphere. Respondent No.8 is ready and willing to make payment of this amount in accordance with any orders that may be passed by this Hon'ble Tribunal.

E. REPORTING TO AUTHORITIES: -

36. In the aftermath of the incident, Respondent No. 8 informed various authorities about the incident by filing an 'incident report', as follows:-

| S. No. | Name of the Authority | Date of Submission | Mode of communication |
|--------|-----------------------|--------------------|-----------------------|
|--------|-----------------------|--------------------|-----------------------|


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| | | of incident reports | |
|---|--|----------------------------|----------------------------------|
| 1 | Inspector, Police Station, Cuddalore | 20/05/2021 | By hand |
| 2 | Joint Chief Environmental Engineer, Tamil Nadu Pollution Control Board, Trichy | 20/05/2021 | Email; Hard copy through Courier |
| 3 | District Environmental Engineer, Tamil Nadu Pollution Control Board, Cuddalore | 20/05/2021 | via email |
| 4 | (a) Joint Director of Industrial Safety & Health (DISH); (b) Inspector of Factories; (c) Chief Inspector of Factories. | 22/05/2021 | via email |
| 6 | The Ministry of Environment and Forests. | 20/05/2021 | via post |
| 7 | The Electrical Inspectorate, Cuddalore | 20/05/2021; 21/05/2021 | Hard copy; via email |
| 8 | The Boiler Inspector, Cuddalore | 20/05/2021;2 1/05/2021 | Hard copy; via email |
| 9 | Assistant Director Quality Control -Agricultural Department, Cuddalore | 20/05/2021;2 1/05/2021 | Hard copy; via email |

In this regard, Respondent No. 8 craves leave of this Hon'ble Tribunal to refer to and produce the above-mentioned letter/emails addressed to various authorities, if so directed.


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37. Vide e-mail dated 28.05.2021, Respondent No. 8 also filed Accident Report in Form-18 Report under the Tamil Nadu Factories Act, 1948 with the Jt. Director of Industrial Safety and Health (“**Jt.DISH**”).
38. On 20.05.2021, Respondent No. 8 also provided, inter-alia, the following to the Branch Officer, Employee State Insurance Corporation:-
- (a) Accident Report;
 - (b) Witness Statement;
 - (c) FIR Copy;
 - (d) Post-mortem report and discharge summary.

F. COMPENSATION TO KIN OF THE DECEASED: -

39. On 13.05.2021, a meeting was held, inter-alia, between Revenue Commissioner, Cuddalore, Superintendent of Police, Cuddalore, officials from Respondent No. 8 and heirs of the deceased personnel. It was decided in this meeting that Respondent No. 8 would pay an amount of Rs. 15 Lakhs each to the legal heirs of the four deceased personnel. It was also decided that Respondent No. 8 would pay an amount of Rs. 10,000 to each person undergoing treatment in hospital. The minutes of this meeting held on 13.05.2021 between Respondent No. 8 and various authorities, along with its English translation is annexed hereto as **Annexure - D**.
40. Pursuant to the above meeting, on 18.05.2021, District Collector and District Revenue Officer, Cuddalore addressed a letter to Respondent No. 8 directing the latter to handover demand drafts of Rs. 15 Lakhs each to the said authority by evening of 19.05.2021. Along with the said letter, the said Authority enclosed a list containing the names of the heirs of each of the four deceased personnel and the amount to be paid to each heir. True copy of the letter dated 18.05.2021 along with its enclosure addressed by District Collector and District Revenue Officer, Cuddalore to Respondent No. 8, along with its English translation, is annexed hereto as **Annexure - E**.


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41. Respondent No. 8 then executed four distinct Compensation Agreements with the kin of each of the four deceased personnel and simultaneously made the payment of Rs. 15 Lakhs each to the heirs. Out of the said 15 Lakhs, Rs. 25,000.00 was paid by Respondent No. 8 in cash and the balance of Rs. 14,75,000.00 was paid through demand drafts in the name of the legal heirs (from the list provided by District Collector along with his letter dated 18.05.2021). True copies of the said Compensation Agreements dated 20.05.2021 signed with the heirs of each of the four deceased personnel along with their English translations are annexed hereto as **Annexure – F (colly.)**
42. The Joint Committee, in the said Report, has concluded that the compensation paid by the Respondent No.8 to the families of each of the four deceased personnel is adequate.
43. Apart from the above payment, the heirs of each of the four deceased personnel also received an amount of Rs. 3 Lakhs as compensation from the Government of Tamil Nadu.
44. Respondent No. 8 has also made regular contributions under Employees State Insurance and Provident Fund, on account of which the legal heirs of the deceased personnel have received the said contributions. Further, under the Employees' State Insurance Act, 1948, monthly pension at the rate of 90% of the last drawn wages are payable.

G. COMPENSATION TO INJURED PERSONS: -

45. Respondent No. 8 paid for the medical expenses of each of the injured personnel and also paid an ex-gratia amount of Rs. 10,000/- to each of the 12 injured personnel. The injured personnel also received contributions under Employee State Insurance, leave salaries etc.
46. Apart from the above, State Government has paid compensation to each injured person in the amount of Rs. 1,00,000/-.

H. ACTION TAKEN BY AUTHORITIES AND RESPONDENT NO. 8'S COMPLIANCE WITH DIRECTIONS ISSUED BY DISH :-

47. On 13.05.2021, Director, Jt. Director and Dy. DISH inspected the said site and investigated the cause of the incident.
48. Respondent No. 8 was then issued a Prohibition Order dated 14.05.2021 under S. 40(2) of the Factories Act, 1948 and Tamil Nadu Factories Rules, 1950, directing, inter-alia, that the entire factory be safely closed within 6 days to prevent any accident and further pointed out circumstances that they believe would have led to the incident. These observations in the Prohibition Order, along with Respondent No. 8's responses are set out in para-wise response below.
49. Vide the above Prohibition Order dated 14.05.2021, Respondent No. 8 was also directed, inter-alia, to rectify the following within 30 days: -
- (a) completely eliminate the above-mentioned unsafe conditions;
 - (b) fully repair distillation kettle R-108;
 - (c) hydro test manufacturer's specified pressure;
 - (d) adjust agitator,
 - (e) adjust and ensure safe functions of Primary, Secondary Commodores, Vapor Line, Pipe-Lines;
 - (f) ensure that safety functions of other safety devices are adjusted, confirmed and certified by a competent person authorized by the Chennai Occupational Safety and Health Director.
- True copy of the Prohibition Order dated 14.05.2021 issued by Jt. DISH along with its English translation is annexed hereto as **Annexure -G**.
50. Pursuant to filing of the incident report, other authorities, namely, Tamil Nadu Pollution Control Board, Boiler Inspector, Agriculture Department etc. visited and inspected the said site.


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51. Vide letter dated 22.05.2021, Respondent No. 8 sent a preliminary response to the Prohibition Order dated 14.05.2021 stating, inter-alia, as follows: -
- (a) Respondent No. 8 will ensure that the plant is always operated in the safest possible manner;
 - (b) Respondent No. 8 checked all the systems thoroughly and corrected all the minor problems observed in the last 6 days;
 - (c) Respondent No. 8 requested for time up to 31.05.2021 so as to complete all the in-process batches and ensure that the plant is completely safe for shutdown.

True copy of Respondent No. 8's letter dated 22.05.2021 addressed to Jt. DISH is annexed hereto as **Annexure - H**.

52. Thereafter, on 11.06.2021, Respondent No. 8 issued a detailed response to the Prohibition Order dated 14.05.2021 informing DISH that Respondent No. 8 had safely completed the in-process batches and the plant is safely shutdown on 30.05.2021. Respondent No. 8 also provided the following compliance status as against each shortcoming mentioned by DISH and requested that Respondent No. 8 be permitted to re-start the plant at the earliest: -

- (a) Defective steam line valve was replaced with new one and bleeder valve provided between double valve. Thus, even if steam supply valve malfunctions, steam will not reach limpet coil. In addition to this arrangement, Respondent No. 8 has also introduced Interlock control. Respondent No. 8 also provided for a temperature alarm for the kettle, with high temperature alarms, built-in with an interlock control, to stop the supply of steam into limpet coil. If for any reason, operator is not nearby, the interlock arrangement would close the valve in the steam supply line. The automatic interlock arrangement


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is a fully automated control system and eliminates operator intervention, during emergency.

- (b) In addition to the vent line, which is already connected the distillation kettle R-108 to the scrubber system, a Safety relief valve was also provided and the same has been connected to the existing scrubber. Thus, any unforeseen gas emission will get vented out from the kettle through both the vent line and the safety valve vent directly to the scrubber system and protect the personnel from chemical vapor exposure.
- (c) Every floor is provided with two sets of staircase. The scaffolding near one of the staircases was made on just the previous day to move mechanical spares which was planned for the day of the incident. In any event, employees were advised to use the alternate staircase that was available to them.
- (d) Respondent No. 8 undertook to submit immediately the particulars of our Occupational Health Centre to DISH. Respondent No. 8 has also engaged a physician/medical officer who has been regularly visiting the Occupational Health Centre. This is in addition to round-the-clock duty being done by medical attendants/nurses.
- (e) All in-process materials from distillation kettle R-108 and associated piping and condensers were washed, cleaned and nitrogen purged. As regards the remaining compliances: -
- (i) competent persons carried out the necessary repairs like replacement of defective valves, checking agitator system
 - (ii) competent persons also carried out hydrotesting of distillation kettle R-108 and other testing, examination of the whole system inclusive of safety system, vapor line, primary, secondary and tertiary condensers and connected piping and scrubber system.


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- (iii) After ensuring safety, plant and equipment of distillation kettle R-108 was fitness certified by the competent person.
- (iv) Instrument and safety system was also tested, examined and certified by competent person.

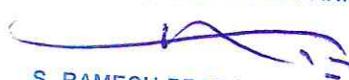
True copy of Respondent No. 8's response dated 11.06.2021 along with its enclosures, to the Prohibition Order dated 14.05.2021 is annexed hereto as **Annexure - I.**

53. On 08.06.2021, Show-Cause Notices were issued by DISH to Respondent No. 8's Occupier and Manager citing violations of various provisions of Factories Act, 1948 and Tamil Nadu Factories Rules, 1950. Both the Show Cause Notices dated 08.06.2021 were responded to by Occupier and Manager, respectively. True copies of both Show Cause Notices dated 08.06.2021 addressed to Occupier and Manager, respectively, along with their English translations are annexed hereto as **Annexure – J.** True copies of replies dated 24.06.2021 of Occupier and Manager, respectively, to the said Show Cause Notices dated 08.06.2021 are annexed hereto as **Annexure-K.**
54. Subsequently, Respondent No. 8 also received a Show Cause Notice dated 09.06.2021. This Show Cause Notice dated 09.06.2021 was also duly responded to by Respondent No. 8. True copy of Show Cause Notice 09.06.2021, along with its English translations, and Respondent No. 8's reply dated 24.06.2021 are annexed hereto as **Annexure-L (Colly.).**
55. Respondent No. 8's response dated 11.06.2021 to Prohibition Order dated 14.05.2021 was considered as an appeal petition by DISH under S. 107 of the Factories Act, 1948 for removal of the prohibition order under S. 40(2) of the said Act.
56. On 24.06.2021, Jt. DISH visited the said site to inspect the compliance of the corrective and preventive actions taken by Respondent No. 8 as set out in its reply dated 11.06.2021.


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57. Vide Order dated 28.06.2021, DISH withdrew the Prohibition Order dated 14.05.2021 and allowed Respondent No. 8 to re-start the production at the said site subject to the following conditions: -

- (a) All safety procedures as laid down in the Factories Act, 1948 and the Tamil Nadu Factories Rules, 1950 Should be followed strictly.
- (b) If the same violations are found again and an injunction is issued, if an appeal petition is received again for the removal of the injunction, the same will not be considered.
- (c) The factory building and machinery should be maintained properly so that it will endanger the safety and security of the employees working in the factory
- (d) Instruments and safety devices in the factory should be inspected once in a month by a qualified person (Competent person) approved by the DISH, Chennai and the same has to be recorded and the register is to be maintained.
- (e) Equipment and machinery should be inspected before the start of the process every day and once in two years by a qualified person (competent person) approved by the Director, Industry Safety and Health.
- (f) The Solvent IPA shall be completely recovered from Acetamidrid M.L in the reactor vessel.
- (g) Residual Acetamidrid impurities shall be removed immediately after recovery of Solvent from Acetamidrid M.L and the vessel may be kept open and it shall be ensured that steam line is 'closed'.

A copy of the Order dated 28.06.2021 issued by DISH withdrawing the Prohibition Order dated 14.05.2021 is annexed hereto as **Annexure -M**.

58. After this Hon'ble Tribunal took cognizance of the said incident, the Joint Committee visited and inspected the said unit on 8th July 2021 . Respondent


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No. 8 duly co-operated with the Joint Committee and shared all necessary documents sought for by the Joint Committee.

I. SAFETY MEASURES TAKEN BY RESPONDENT NO. 8 TO ENSURE SAFE DISTILLATION OPERATION IN KETTLE R-108:-

59. Before resuming the operations in R-108, to ensure that flammable atmosphere is completely removed from the distillation system, Respondent No. 8 has taken the following steps:-
- (a) Kettle and the connected condenser systems were thoroughly cleaned with water and inside of the vessel was inspected. The agitator shaft blades were inspected to ensure good condition.
 - (b) Pressure test of the entire system was done at 1.25 times of the design pressure in the presence of the external competent person approved by DISH.
 - (c) Entire system was then purged with Nitrogen gas to reduce the oxygen content inside the system. Such N₂ inertisation process is mandatory as per the SOP of the plant operations. Nitrogen of purity above 98% is being produced in house, using Pressure Swing Adsorption (PSA) Technology. Further, to ensure that the Nitrogen pressure inside the distillation system is controlled within 2 Bar G, Pressure Regulation Valve (PRV) and Safety Valve at the downstream of PRV are provided, in the Nitrogen header.
 - (d) Respondent No. 8 has chosen steam, which is an inherently safe heating medium, from the angle of prevention of fire, as compared to thermic fluid or electric heating coil.
 - (e) Also, low pressure steam of less than 2.7 Bar G is used in the limpet coil of the Distillation kettle, R-108. For controlling the steam pressure at below 2.7 Bar G, in the limpet coil to R-108, automatic


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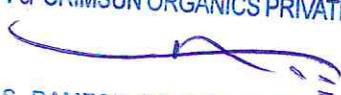
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steam pressure regulation valve (PRV) is provided in the steam header.

- (f) In addition to PRV, a secondary control viz. a Safety Valve is provided, at the downstream of PRV, and it is set to open, if the steam pressure reaches 3.0 Bar G. Also a tertiary safety control viz. another safety valve in the limpet coil of the distillation kettle is provided to ensure steam pressure inside the limpet coil not to exceed 3.1 Bar G. Thus, Kettle R-108 is designed, with a three-fold safety protection, on steam heating.
- (g) To monitor the temperature of the distillation mass, inside the reactor, Digital Resistance Temperature Detector (RTD) is provided.
- (h) For monitoring the pressure inside the distillation kettle, pressure gauge is provided.
- (i) Entire system is connected to atmosphere, through vent scrubber. Not being a closed vessel, the pressure in the kettle does not normally go beyond the atmospheric pressure. The scrubber is intended to absorb any harmful chemicals, if any, from the gases before they are expelled into the atmosphere.
- (j) To prevent air leakage into the system, a high-quality double mechanical seal with lubrication system is provided for the agitator installed in the kettle, which is another built-in safety measure.
- (k) For proper operation of the system, approved standard operating procedures are available and the operatives are adhering to the specified parameters.
- (l) The system is maintained by well-established preventive maintenance management system and procedures. This entails regular checks as well as maintenance procedures, some of which are done on monthly, half-yearly, and yearly basis.


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60. In addition to the above steps, Respondent No. 8 has also taken the following additional safety measures:
- Safety valve in the shell side (based on suggestion of DISH).
 - Double valve with bleeder valve arrangement (based on suggestion of DISH).
 - Hooter to alert the operator in case the temperature exceeds the set limit.
 - Automatic steam control valve system (Sensor / Controller / On-Off valve) – the valve would get closed if the mother liquor temperature exceeds a pre-set value.
61. Further, Respondent No. 8 has engaged qualified, experienced and trained Engineers and Chemists (at a minimum, Bachelor's degree holders in Chemistry or a Diploma in Chemical Technology) for the operation of the system. All such operators are also supervised by a Chemical Engineer, who is the shift in-charge.

J. RESPONDENT NO. 8's PARA-WISE RESPONSE TO THE REPORT OF THE JOINT COMMITTEE: -

62. **Response to para 1.0:** The contents of para 1.0 of the said Report are a matter of record and need no response.
63. **Response to paras 1.0 (repeated) and 2.0:** The contents of paras 1.0 (repeated) and 2.0 of the said Report need no response.
64. **Response to para 3.0:** The contents of para 3.0 of the said Report are not denied insofar as the same are a matter of record. However, it is submitted that on account of sudden and wholly unanticipated spike in pressure in the kettle, the manhole of the distillation kettle R-108 popped open and the residue spilt out. This residue fell on insulation material made out of Thermocol provided in the utility pipelines, reactors, plastic chair, paper bags, etc. present in the adjoining area. Burning of the said material caused


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minor fire and fumes. Major component of the fumes was burning of such insulation material (Thermocol), plastic chairs, etc.

65. **Response to para 4.1:** The contents of para 4.1 of the said Report need no response.
66. **Response to para 4.2:** The contents of para 4.2 of the said Report are a matter of record except Respondent No. 8 has also been allotted and continues to be in possession of Plot No. C-11, since 05.10.2017. As regards Consent to Operate (“CTO”) under the Water (Prevention and Control of Pollution) Act, 1974 (“Water Act”) and Air (Prevention and Control of Pollution) Act, 1981 (“Air Act”), it is submitted that Respondent No. 8 had submitted applications dated 17.03.2021 before TNPCB for renewal of CTOs under both enactments. In the meanwhile, vide a common Order dated 13.05.2021, TNPCB extended the validity of CTOs upto 30.11.2021. The renewed CTOs have now been issued to Respondent No. 8 vide Consent Order No. 2105237225613 dated 29.11.2021 (under the Air Act) and Consent Order dated 2105137225613 dated 29.11.2021 (under the Water Act) issued by TNPCB. A copy of both the said Consent Orders dated 29.11.2021 under the Air Act and the Water Act are annexed hereto as **Annexure-N (colly)**.
67. **Response to para 4.3:** The contents of para 4.3 are a matter of record. As regards Respondent No. 8’s CTO under Air Act and Water Act, the contents of para 66 above are reiterated. As regards unnumbered sub-para 4 of para 4.3, it is submitted that Respondent No. 8, vide its letter dated 11.06.2021, has already duly responded to the Show-Cause Notice dated 14.05.2021 of Addl. DISH, Trichy. The said response dated 11.06.2021 of Respondent No. 8 is already annexed hereto as Annexure - I.


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68. **Response to paras 4.4 and 4.5:** The contents of paras 4.4 and 4.5 need no response.
69. **Response to para 4.6:** Respondent No. 8's para-wise response to sub-paras (i) to (vi) of para 4.6 is as under: -

- i. **Purported observation of Jt. Director (DISH):** *"In order to release sudden abrupt rise of pressure and heat in the reactor vessel above the required level of pressure and heat, for additional safety purpose, the safety valve supposed to be installed but the same was not in place. And not connected to Scrubber system to avoid gas release outside."*

Response on behalf of Respondent No 8: -

- (a) It is submitted that the vessel in question is not a reactor vessel but is a distillation kettle operating at atmospheric pressure only.
- (b) The kettle vent is always open to the atmosphere through a scrubber system. There is neither any requirement under law nor any necessity to install a safety valve in the shell of such atmospheric distillation kettle.
- (c) Further, the statement that the kettle is "not connected to the scrubber system to avoid gas release outside" is incorrect and denied. In fact, since the very inception of the plant, the kettle has remained connected to the atmosphere through the scrubber system.
- (d) Further the incident in question did not occur on account of absence of safety valve, as the kettle is, in any event, open to atmosphere through the scrubber system.
- (e) In a closed pressurized system where vent is not provided, the function of venting is expected to be performed by the safety valve.
- (f) Since the distillation system at the said unit is open to atmosphere, the function was being performed by the already existing vent line,


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which is always open to atmosphere through the scrubber system. Yet as and by way of abundant caution and as suggested by DISH, Respondent No. 8 has now additionally installed a safety relief valve and the same is connected to the existing scrubber system.

(g) At the time of occurrence of the incident (7:40 AM) in question, the distillation process had already been completed (2 AM on the same day) and steam heating to the kettle was stopped at the time itself. The distillation residue was kept under agitation for natural cooling so that once the temperature reached 60 degrees it could be drained. However, even after closing the steam valve, due to malfunctioning of the steam valve, some amount of steam kept flowing in the jacket of the distillation kettle leading to prolonged heating of the distillation residue. This was the probable cause of a sudden increase in pressure which caused the manhole cover to pop open. This was completely unanticipated.

(h) It is submitted that the distillation kettle has been regularly inspected by Respondent No. 8 as part of its preventive maintenance management system, and nothing amiss was ever found during such inspections. Before this incident, Respondent No. 8 has not encountered any occurrence of malfunction of steam valve connected to the distillation kettle. A copy of one such inspection report dated 17.04.2021 is annexed hereto as **Annexure - O**.

- ii. **Purported observation of Jt. Director (DISH):** *“If the leak occurred in between steam line to reactor vessel, in order to avoid steam leak, double valves had not been installed and in between the double valves, a bleeder valve had not been installed.”*

Response on behalf of Respondent No 8: -


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- (a) The above observation of DISH is incorrect.
- (b) As already set out in the previous paras, double valves were already provided by Respondent No. 8 – (a) first valve (Globe Valve) which has the function of regulating the steam flow; (b) second valve (ball valve) which has the function of switching on and off the steam flow to the jacket. Additionally, a safety valve has been installed in the jacket of the kettle to ensure that the pressure does not go above **3 bar**.
- (c) Although all safety measures had been duly taken in the designing and operation of the distillation kettle and there is no requirement under any law to install a bleeder valve, yet as and by way of abundant caution and as suggested by DISH, Respondent No. 8 has now additionally installed a bleeder valve in between the two steam valves.

iii. **Purported observation of Jt. Director (DISH):** *“In case of temperature rise above the required level in the reactor vessel, the arrangement for supply of cooling water in the steam line has not been made.”*

Response on behalf of Respondent No 8: -

- (a) It is submitted that this observation is incorrect.
- (b) Furthermore, no such observation was made in any show cause notice sent to the Respondent No.8. The only observation made earlier was that the cooling water was allegedly not duly circulated.
- (c) Arrangement to circulate either cooling water or chilled water in the jacket (limpet coil) was duly provided already. However, the pressure rise was so sudden that before the shift engineer was able to circulate the cooling water or chilled water, the manhole cover


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opened and the residue and fumes started emanating from the kettle, thereby forcing the shift engineer to run out of the building.

- iv. **Purported observation of Jt. Director (DISH):** *“Since the Acetamiprid impurities are decomposing material, it should not store in the reactor vessel at large quantity. It should be drained to Drums. After draining the reactor vessel, the reactor vessel should be tested.”*

Response on behalf of Respondent No 8: -

- (a) This was not an observation made by DISH in its prohibition order dated 14.05.2021. In any event and without prejudice to the above, Respondent No. 8’s response to the above purported observation is as under.
- (b) Residue generated in the distillation kettle is mainly comprised of following materials: Acetamiprid, Unreacted Raw Materials [CPMMA (N(6-chloropyridin-3-yl)-n-methylmethanamine), ENCA (Ethyl N-Cyanoethanimideate)], intermediates and Impurities.
- (c) Firstly, none of the above materials are ‘decomposing materials’ under operating or storage conditions.
- (d) Secondly, the vessel in question is not a reactor vessel but a distillation kettle.
- (e) Furthermore, in any event, Respondent No. 8 did not intend to store the residue in the kettle for any prolonged duration. The distillation process had only been completed at 2 AM on the day of the incident, and the residue was being allowed to gradually cool down in the kettle (which takes about 8-10 hours) before it could be drained and stored in drums. This is part of the operational steps as prescribed in the standard operating procedures.


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(f) The aforesaid statement of DISH as referred in this point said that the decomposing material should not be stored “at large quantity”. However, Respondent No.8 would like to humbly submit that the amount of residue in the kettle was extremely low, being only 180-200 litres in a kettle having capacity of 14000 litres, which is approximately 1.43% of the total capacity of the kettle. Hence the point of storage of large quantity of residue is not correct. Respondent No. 8 craves leave of this Hon’ble Tribunal to refer to and rely upon the said response and other documents filed by it in response to the observations of DISH.

- v. **Purported observation of Jt. Director DISH:** *“It was concluded that in the absence of above-mentioned safety measures, the malfunctioning of the steam valve might have led to the continued heating of the residue, even after closing the valve at 0200 hrs. Sudden blast-opening of the manhole, with minor fire and splash of fluid occurred. Fire at the incipient could not be controlled, due to leaking seal oil over the reactor. Another source of ignition could be the static discharge developed due to sudden opening of manhole.”*

Response on behalf of Respondent No. 8

- (a) This was not an observation made by DISH in its prohibition order dated 14.05.2021 or other communications. In any event and without prejudice to the above, Respondent No. 8’s response to the above purported observation is as under.
- (b) As regards malfunctioning of the steam valve, it is submitted that kettle R-108 in question is open to the atmosphere through a scrubber system. There is neither any requirement under law nor any necessity to install a safety valve in the shell of such atmospheric distillation kettle. Yet as and by way of abundant

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caution and as suggested by DISH, Respondent No. 8 has now additionally installed a safety relief valve and the same is connected to the existing scrubber system.

(c) Further, due to pressure in the kettle, the manhole connected to the distillation kettle R-108 popped open and the residue spilt out. This residue fell on insulation material made out of Thermocol provided in the utility pipelines, reactors, plastic chair, paper bags, etc. present in the adjoining area. Burning of the said material caused minor fire and fumes. Major component of the fumes was burning of such insulation material (Thermocol), plastic chairs, etc.

vi. **Purported observation of Jt. Director DISH:** *“The committee also noticed that absence of automation, comprehensive standard operating procedure on operational parameters like temperature, pressure, addition of chemicals etc., No alarm system in the process area to alert the personnel during unforeseen situation/emergency, lack of knowledge/training on safety precautions to be taken during emergency situation caused the death of four people and injuries to 12 employees.”*

Response on behalf of Respondent No. 8: -

(a) This was not an observation made by DISH in its prohibition order dated 14.05.2021 or other communications. In any event and without prejudice to the above, Respondent No. 8’s response to the above purported observation is as under.

(b) The process of removing solvent from the residue is a simple heating and evaporating low boiling substances and retaining the residue at the bottom. Hence, automation and alarm system for

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such simple operations is not necessary and also not mandated under any regulation or general accepted principle.

- (c) Further, Respondent No. 8 would like to submit that an elaborate SOP for monitoring and controlling temperature, which is the only process parameter which needed to be controlled in this entire operation is available. Since the operation is an atmospheric distillation, the pressure inside the reactor is always atmospheric pressure.
- (d) Respondent No. 8 has also prepared and submitted detailed Disaster Management Plan to DISH on 01.09.2020 [which was also part of environmental impact assessment (EIA) report submitted in 2018 to the Ministry of Environment, Forest and Climate Change], wherein the actions to be taken by employees in case of arising of such emergencies are elaborated in detail. Further, all the employees are trained well on this procedure. In addition to that, mock drills are regularly conducted by Respondent No. 8, wherein an emergency is simulated, and actions of all employees is observed for conformance as mentioned in the Disaster Management Plan. The details of conduct of such mock-drills are documented and reviewed by the Dy. DISH.
- (e) Respondent No. 8 craves leave of this Hon'ble Tribunal to produce the relevant documents if necessary and as and when directed by this Hon'ble Tribunal.

70. **Response to para 4.7:** In response to para 4.7, the contents of paras 22 to 27 above are reiterated. It is, however, clarified that the deceased were admitted to the hospital at 8.30 am and were sent for post-mortem at 4.30 p.m. on 13.05.2021. Further, 11 personnel were suspected of inhalation impact and were sent to Government Head Quarters Hospital, Cuddalore

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For CRIMSUN ORGANICS PRIVATE LIMITED,

S. Ramesh Prabakaran
S. RAMESH PRABAKARAN,
MANAGING DIRECTOR.

for check-up. Thereafter the said hospital was requested to release them on request for further precautionary investigation in other hospitals. Immediately after taking on request discharge from the Government Head Quarters Hospital, Cuddalore, these 11 personnel were admitted to three other hospitals. They were then discharged from the said hospitals after it was found that there was no adverse impact on the health of these personnel from gas inhalation.

71. **Response to para 4.8:** In response to para 4.8, Respondent No. 8 submits as follows: -

(a) Respondent No. 8 deeply regrets the loss of life which occurred and laments any environmental damage caused due to the incident. It is humbly submitted that the incident was a freak occurrence outside the control of Respondent No.8. Even though trained personnel were present at the unit, the sudden nature of the occurrence of the incident did not allow for corrective measures to be taken immediately which resulted in the unfortunate deaths. Respondent No. 8 further submits as under: -

(i) Respondent No. 8 is fully compliant with all statutory, regulatory, safety clearances stipulated by various concerned departments. In fact, the Joint Committee, in Annexure-2 to the said Report, has noted that Respondent No. 8 is compliant with all conditions under various legislations. The Respondent No. 8 has made substantial investments in installing and maintaining state-of-the-art machinery and in implementing best practices and processes to ensure the safety of the people and equipment.

(ii) As regards automation and alarm system, it is submitted that the process of removing solvent from the residue is a simple heating and cooling process, which involves evaporation of low boiling


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For CRIMSUN ORGANICS PRIVATE LIMITED,


S. RAMESH PRABAKARAN,
MANAGING DIRECTOR.

substances and retaining the residue at the bottom. Hence, automation and alarm system for such simple operations is neither necessary, nor the generally required, and also not mandated under any legislation and regulation.

- (iii) Further, R-108 distillation kettle is open to the atmosphere through a scrubber system. There is neither any requirement under law nor any necessity to install a safety valve in the shell of such atmospheric distillation kettle. Further the incident in question did not occur on account of absence of safety valve, as the kettle is, in any event, open to atmosphere. In a closed pressurized system, this function of venting is expected to be performed by the safety valve. Since R-108 is an open atmospheric distillation system, the function was being performed by the already existing vent line, which is always open to atmosphere through the scrubber system. Yet as and by way of abundant caution and as suggested by DISH, Respondent No. 8 has now additionally installed a safety relief valve and the same is connected to the existing scrubber system.
- (iv) Further, Respondent No. 8 would like to submit that an elaborate SOP for monitoring and controlling temperature, which is the only process parameter which needed to be controlled in this entire operation is available. Since the operation is an atmospheric distillation, the pressure inside the reactor is always atmospheric pressure. Even otherwise, Respondent No. 8 has prepared written SOPs for each of its batch operations/process equipment such as for maintaining critical operating parameters (eg. Temperature), which is required by the operating personnel, reviewed by operating managers and approved by Quality Assurance head. In addition to that, HAZOP study (Hazardous operability study) is performed for all the batch processes, hazardous are identified, risks are evaluated,

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adequacy of existing control measures are verified and additional control measures are put in place before commencing every new processes. Respondent No. 8 also has well established safety permit system for carrying of activities like height work, hot work, cold work, rigging work, electrical isolation work, confined space entry etc.

- (v) Further, Respondent No. 8 has also prepared and submitted detailed Disaster Management Plan to DISH on 01.09.2020, wherein the actions to be taken by employees in case of arising of such emergencies situations are elaborated in detailed. Further, all the employees are trained well on this procedure. In fact, all its employees who carry out the unit operations have a minimum qualification of Bachelor degree in Chemistry or Diploma in Chemical Engineering. They also have operating experience of working in chemical plants for atleast 2 years. Respondent No. 8 submits that the incident in question could be brought into control due to the immediate actions taken by the operating team present at the time of the incident. Even the fire was put out within 15 minutes using minimal fire-fighting equipment as set out in the said Report.
- (vi) In view of the above, Respondent No. 8 humbly submits that there was no negligence either on part of Respondent No. 8 or its personnel.

72. **Response to para 4.9(i):** In response to para 4.9(i), it is submitted as follows: -

- (a) The valve provided in the steamline was closed at 2 a.m. by the night shift chemist. Due to malfunctioning of the steam valve, the steam had leaked into the Distillation Kettle jacket and kept on heating the Distillation residue. This lead to the excess pressure build up inside the


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For CRIMSUN ORGANICS PRIVATE LIMITED,

S. RAMESH PRABAKARAN,
MANAGING DIRECTOR.

Kettle. On noticing the fumes coming from the manhole cover, the Shift Engineer tried to open the cooling valve provided the kettle jacket, for cooling the residue. However, at that time the Lube Oil hose of the Kettle mechanical seal leaked and splashed out on the Shift Engineer. Hence, he moved away from the place.

(b) The Safety Steward who was in the near-by building at the time of the incident, wore the Self Contained Breathing Apparatus (SCBA) and rushed to the terrace. However, he could not bring the people from the terrace to the ground floor and hence came down. Since he was feeling some irritation on the skin he was also send to the Government Hospital after washing the body and giving first aid.

In respect of the remaining contents of para 4.9, the contents of paras 39 to 46 of this reply affidavit are reiterated.

73. **Response to para 4.9(ii):** In response to para 4.9(ii), the contents of paras 28 to 35 of this reply affidavit are reiterated.
74. **Response to para 4.9(iii):** In response to para 4.9 (iii), it is submitted that based on the recommendation of the Joint Committee in the said Report, Respondent No. 8 is ready and willing to make payment of Rs. 5,89,690/- (Rupees five lakhs eighty-nine thousand six hundred and ninety only) towards environmental damage cost, in accordance with any orders that may be passed by this Hon'ble Tribunal.
75. **Response to para 5.1:** In response to para 5.1 of the said Report, it is submitted that : -
- (i) the said Report duly notes (at S. No. 13 of Table 8 in the said Report) that Respondent No. 8 has obtained the relevant licences which are valid as on date. As regards Consent to Operate (“CTO”) under the

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S. RAMESH PRABAKARAN,
MANAGING DIRECTOR.

Water Act and Air Act, it is submitted that Respondent No. 8 had submitted applications dated 17.03.2021 before TNPCB for renewal of CTO under both enactments. The renewed CTOs have been issued to Respondent No. 8 vide Consent Order No. 2105237225613 dated 29.11.2021 and Consent Order dated 2105137225613 dated 29.11.2021. The said renewed CTOs under the Air Act and the Water Act have already been annexed hereto as Annexure -N (Colly.).

- (ii) As regards the safety measures taken by Respondent No. 8, the said Report duly notes (at S. No. 13 of Table 9 in the said Report), that the safety measures at Respondent No. 8's unit in question are in place, are functional and adequate for safe operation of the system.

The remaining contents of para 5.1 do not pertain to Respondent No. 8 and need no response.

76. **Response to para 5.2:** In response to para 5.2 of the said Report, it is submitted that the said Report duly notes at para 5.2(f) that there is no unauthorized discharge of untreated trade effluents/sewage by any of the industries in SIPCOT (which also includes Respondent No. 8). The remaining contents of the para 5.2 need no response.
77. **Response to para 5.3:** In response to contents of para 5.3 of the said Report, it is submitted that the said Report duly notes (at S. No. 13 of Table 11 in the said Report), that Respondent No. 8 has installed an online air monitoring system which was found in operation by the Joint Committee. The remaining contents of the para 5.3 need no response.
78. **Response to para 5.4:-** The contents of para 5.4 of the said Report need no response.
79. **Response to para 6.0 - 'CONCLUSION' – sub-para(A) :-**

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M. Murugan 11/12/2021

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For CRIMSUN ORGANICS PRIVATE LIMITED,

S. Ramesh Prabakaran
S. RAMESH PRABAKARAN,
MANAGING DIRECTOR.

- (a) **Response to sub-para (i) and (ii):** In response to sub-paras (i) and (ii), it is submitted that due to excess pressure inside the Kettle R-108, the manhole cover opened, causing the hot residue within the Kettle R-108 to fall on the insulation material, paper bags etc. available adjacent to the said Kettle. Burning of this material caused emission of dense smoke. Respondent No. 8 understands that inhalation of this dense smoke may possibly have caused the suffocation and consequent fatality of the four deceased personnel.
- (b) **Response to sub-paras (iii) and (iv):** In response to sub-paras (iii) and (iv), contents of para 71 of this reply affidavit are reiterated. It is further submitted that a scrubber system to vent out the gases has always been available since the inception at the said unit. As and by way of abundant caution, a safety relief valve has been provided by Respondent No. 8 and the same has been connected to the existing scrubber. Thus, any unforeseen gas emission will get vented out from the Kettle through, inter-alia, the safety valve vent directly to the scrubber system and protect the personnel from chemical vapor exposure. It is further submitted that Respondent No. 8 has provided adequate safety measures at the said unit. In this regard, contents of para 12 and paras 59 to 61 of this reply affidavit are reiterated.
- (c) **Response to sub-para (v):** In response to sub-para (v), contents of paras 22 to 27 of this reply affidavit are reiterated.
- (d) **Response to sub-para (vi):** In response to sub-para (vi), contents of paras 38 to 45 of this reply affidavit are reiterated.
- (e) **Response to sub-para (vii):** In response to sub-para (vii), contents of paras 39 to 46 are reiterated. It is further submitted that Respondent No. 8 is committed to conduct health checkups for the injured employees. Respondent No. 8, in any case, conducts period health

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For CRIMSUN ORGANICS PRIVATE LIMITED,


S. RAMESH PRABAKARAN,
MANAGING DIRECTOR.

checkups for all its employees and will do so in respect of the injured persons who continue to be employed with Respondent No. 8. In case any further investigative check-up is required in case of such employees, Respondent No. 8 is committed to take necessary steps. Further, as regards payment of environmental compensation amounting to Rs. 5,89,690/- due to contribution of reaction mixture into the atmosphere, it is submitted that the Respondent No. 8 is ready and willing to pay the said amount in accordance with any orders that may be passed by this Hon'ble Tribunal.

- (f) **Response to sub-para (viii):** In response to sub-para (viii), it is submitted that Respondent No. 8 prepared the onsite emergency plan in September, 2018 which was part of its Environmental Impact Assessment Report submitted to Ministry of Environment, Forest & Climate Change. On 01.09.2020, Respondent No. 8 submitted its report on "Onsite Emergency Plant and Disaster Control Measures" to DISH, Cuddalore for his consent. The mock-drill conducted on 12.04.2021 was the latest mock drill conducted prior to the incident in question. Respondent No. 8 has again conducted its latest mock-drill on 25.10.2021. In this regard, Respondent No. 8 craves leave of this Hon'ble Tribunal to produce the relevant document/report if required.
- (g) **Response to sub-para (ix):** The contents of sub-para (ix) need no response.
- (h) **Response to sub-para (x):** In response to sub-para (x), it is submitted that Respondent No. 8, vide its letter dated 11.06.2021, has duly responded to each of the purported observations noted in the Prohibition Order dated 14.05.2021. By way of abundant caution, the Respondent No. 8 has conducted and completed all the additional works pointed out by DISH in the said Prohibition Order. In this regard, contents of para 52 of this reply affidavit are reiterated. The remaining

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For CRIMSUN ORGANICS PRIVATE LIMITED,

S. Ramesh Prabakaran
S. RAMESH PRABAKARAN,
MANAGING DIRECTOR.

contents of sub-para (x) are not denied so far as the same are a matter of record.

(i) **Response to sub-para (xi):** The contents of sub-para (xi) need no response.

(j) **Response to sub-para (xii):** In response to sub-para (xii), the contents of para 71 of this reply affidavit are reiterated.

80. **Response to para 6.0 - 'CONCLUSION' – sub-para (B)** : In response to para 6.0, Respondent No. 8 submits that, as is already set out in this reply-affidavit as well as Annexure -2 to the Joint Committee Report, Respondent No. 8 is fully compliant with all statutory guidelines/provisions as well as safety measures as suggest by DISH, TNPCB and other authorities. Respondent No. 8 deeply regrets the loss of life which occurred and laments any environmental damage caused due to the incident. The remaining contents of para 6.0 need no response.

81. It is submitted that Respondent No. 8 is already in full compliance with the directions of DISH and other authorities issued pursuant to the incident in question, which is also duly noted by the Joint Committee in the said Report. It is, therefore, humbly submitted that no orders are required to be passed by this Hon'ble Tribunal in this regard.

82. I humbly crave leave of this Hon'ble Tribunal to file further additional affidavit and documents, if so required and as when directed by this Hon'ble Tribunal.


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For CRIMSUN ORGANICS PRIVATE LIMITED,



S. RAMESH PRABAKARAN,
MANAGING DIRECTOR.

DEPONENT

VERIFICATION: -

Verified by me at Cuddalore this the 18th day of December, 2021 that the contents of my above Reply Affidavit are based on information received and believed to be correct. No part of it is false and nothing material is concealed therefrom.

For CRIMSUN ORGANICS PRIVATE LIMITED,



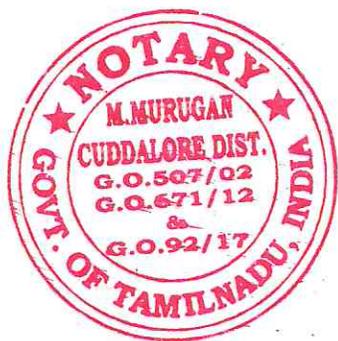
S. RAMESH PRABAKARAN,
MANAGING DIRECTOR.

DEPONENT

Signed Before me

M. Murugan

**M. MURUGAN, M.H.R., B.Sc., B.L.
NOTARY PUBLIC & ADVOCATE
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ANNEXURE-A



CRIMSUN ORGANICS PRIVATE LTD

CERTIFIED TRUE COPY OF RESOLUTION PASSED AT THE 01/2021-22 MEETING OF BOARD OF DIRECTORS OF CRIMSUN ORGANICS PRIVATE LIMITED HELD ON WEDNESDAY, 07TH DAY OF JULY 2021 AT C-2/32, SAFDARJUNG DEVELOPMENT AREA, NEW DELHI – 110016 AT 03:00 P.M.

Authorization in relation to various Legal Matters

“RESOLVED THAT any Director of the Company be and are hereby severally authorized on behalf of the Company to do all such acts, deeds and things including but not limited to:

- i. to file, institute, defend, compound, compromise, settle, withdraw cases and reply to notices;
- ii. to sign, verify and confirm petitions, applications, replies, rejoinders, affidavits, vakalatnama, adduce and /or tender evidence, obtain certified copies of the same;
- iii. to appear and represent the company in the courts of law, tribunals, police stations, authorities, Govt. department or any other forum;
- iv. to delegate, appoint or authorize any official of the Company or any other person through a Letter of Authority or by Power of Attorney (as the Attorney may deem fit and appropriate) with respect to any authority as mentioned herein above;
- v. and to do any or all of such acts, deeds and things as may be required to be done, for or on behalf of the Company, and to revoke such delegation of authority as they deem fit and proper.

RESOLVED FURTHER THAT a certified copy of this resolution signed by any of the Director or Company Secretary be provided to anyone concerned or interested in the matter.”

**/Certified True Copy/
For Crimsun Organics Private Limited**

Senthurpandian Rameshprabakaran
Managing Director
DIN: 05339640

Date: 13.07.2021
Place: Cuddalore

Alwar Paranitharan
Director
DIN: 07584620

**Regd. Office / Works : C-9, C-10 & C-11, SIPCOT Industrial Complex, Kudikadu,
Cuddalore, Tamil Nadu - 607 005.**

Phone : 04142-239777, E-mail : info@crimsunorganics.com

CIN:U24299TN2016PTC111396

Health, Safety & Environment Policy Statement

Crimson Organics Private Limited is committed for providing and maintaining a healthy, Safe & Environmental friendly workplace for all stakeholders including workers, contractors, clients, visitors and interested parties.

Hazards and risks to Health, Safety & Environment will be identified and evaluated and the same shall be eliminated or minimised.

Goal: Our goal is to provide a healthy, safe & environmental friendly work place to all workers, contractors, clients, visitors and interested parties. Further, prevent pollution and protect environment through efficient use of technology, implementation of effective control measures, minimizing waste and conservation of natural resources. This will be achieved through the participation, co-operation and commitment of all the employees of the organization.

Objectives of Policy:

- To establish and implement an Occupational Health, Safety & Environment improvement Programme.
- To established and implement Health, Safety and Environment monitoring system.
- To identify the hazards, evaluate their associated risk and implement measures to mitigate risk.
- To be aware of all risks and changes in risk factors in areas regarded as high risk.
- To stay abreast of all legal requirements and to meet them.
- To train everyone on matters pertaining to their work and manage the associated risks involved.
- To ensure the knowledge and information available is adequate to achieve these objectives.
- To ensure all employees take part actively in the Hazard identification and risk management programmes.
- To continually evaluate Occupational health, Environment and safety improvement programmes, and take necessary corrective actions whenever there is a deviation from the action plan.

Responsibility: The responsibility for managing health, safety and Environment ultimately rests with the person in control of the business, directors and management. However, every employee has his own share of responsibility in improving the same.

Management will:

- Ensure the business complies with all legislation relating to Health, Safety and Environment.
- Eliminate or control all workplace hazards and mitigate risks as far as reasonably practicable
- Establish standard operating procedures and train employee on the same.
- Ensure all activities are performed as per established standard operating procedures.
- Consult and involve workers wherever possible on the matters relating to health, safety and environment.
- Provide appropriate safety equipment and personal protective equipment
- Provide a suitable injury management and return to work program.

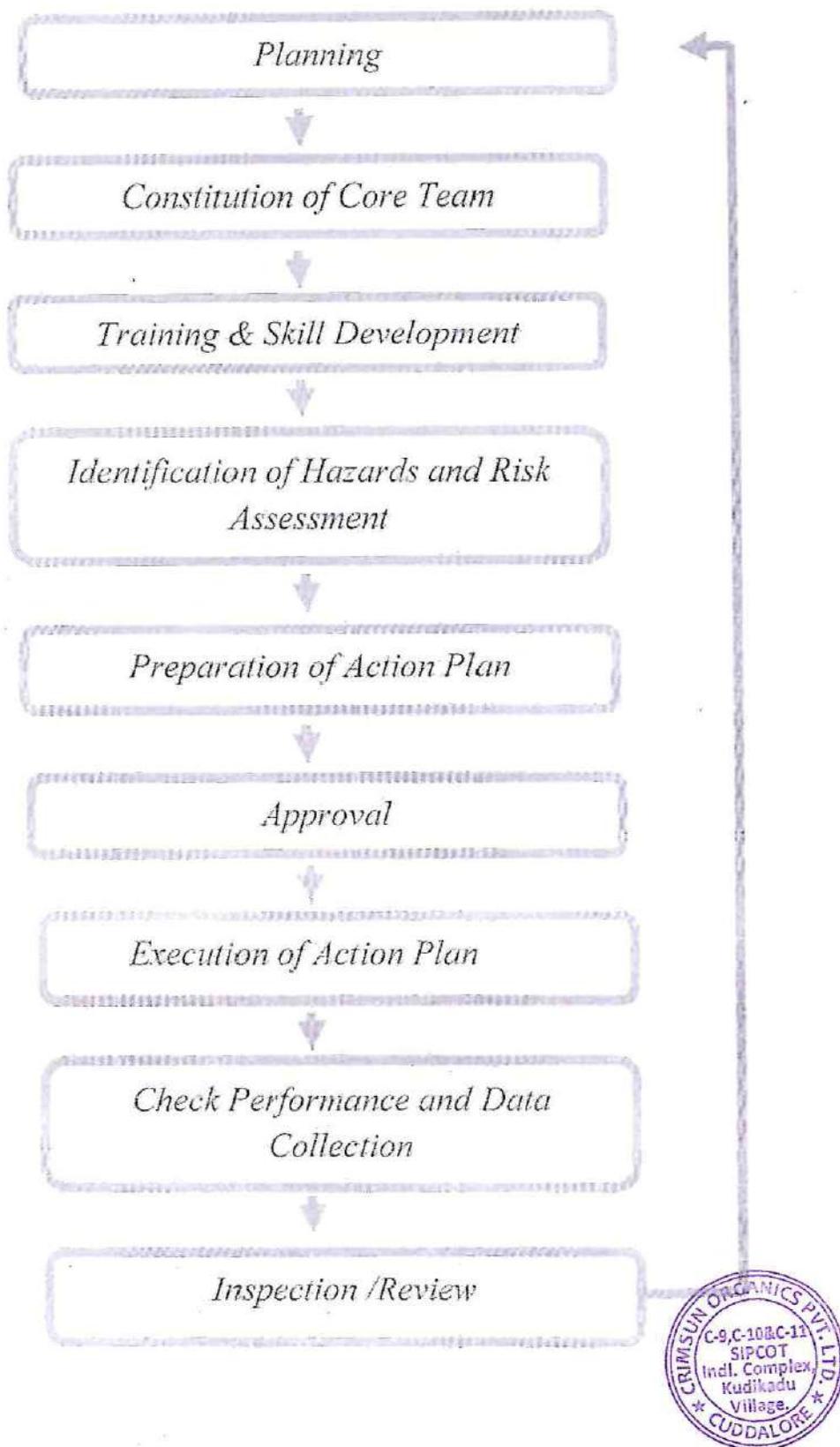
Employees will:

- Take reasonable care for their own health and safety.
- Perform the all works by complying with the legal requirements related to Health, Safety and Environment.
- Follow standard operating procedures, work instructions and rules.
- Participate in trainings organised to improve Health, Safety and Environment.
- Report health, safety and environmental hazards
- Report all incidents and investigate to identify the root cause and take appropriate measures to prevent recurrence.



Policy Review:

This policy shall be reviewed annually and revised as necessary in the light of changing conditions and the findings of surveys/studies conducted by the Health and Safety Workplace Committee/ Department or based on HSE performance

Flow Chart of Implementation of Policy

Crimsun Organics Private Limited

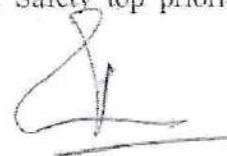
Health, Safety & Environment Policy

Crimsun Organics Private Limited (COPL) is committed to provide a safe, clean and healthy working environment and to follow operating procedures that will safeguard people and protect the environment and natural resources.

In particular, COPL is committed to:

1. Prevent injury, ill health and pollution by taking proactive measures.
2. Improve the performance of HSE management system continually by setting objectives, monitoring and controlling implementation of action plans.
3. Comply with country-specific regulatory standards on Environment, Occupational Health & Safety.
4. Eliminate the losses and reduce the consumption of resources by improving the processes, technologies and systems.
5. Knowledge management through acquiring, analysing, storing and disseminating information related to Safety, Health and Environment.
6. Communicate this policy to the stakeholders.

Each employee has the responsibility to give Environment, Health and Safety top priority and proactively contribute to establish a safety culture in our company.



Place: Crimsun organics Pvt Ltd
Date: 01-08-2019

Managing Director *Operates*



ANNEXURE-C



CRIMSUN ORGANICS PRIVATE LTD

COPL/2021/ 037

15.05.2021

To

The Director of Industrial Safety and Health,
Thiru.Vi.Ka. Industrial Estate, Guindy,
Chennai -600 032.

Respected Sir,

Sub: Submission of Incident Report— Reg.

This letter intends to clarify information about an incident that occurred at our Production Block on 13th May 2021. The summary of the incident as follows:

Incident Summary

| | | |
|-------------------------------|---------------------------|-------------------------------|
| Date of Incident | : 13.05.2021 | Time : 7:40AM |
| Incident Location & Equipment | : Production Block, R-108 | Floor : 2 nd Floor |

Incident Description:

During the early hours of 13th May- 2021, in distillation kettle, R-108, isopropyl alcohol (IPA) recovery process, from Acetamidrid mother liquor was taking place. This IPA recovery operations completed and steam to the reactor limpet coil was closed at about 02:00 hrs. (night shift) and kept the stirrer in on condition. It was planned to drain the residue, during the subsequent general shift hours.

On 13th May, around 07:30 hrs, A-shift chemist, who was operating the near-by reactor, noticed some smell coming from the reactor area and informed to the Shift-in-charge. Immediately Shift-in-charge came to the spot and noticed fumes coming from the reactor(R-108) manhole cover. So, he tried to apply cooling water to the reactor(R-108) limpet coil.

At that time, he saw more fumes started coming from the reactor manhole cover flange joint. Hence, he could not open the cooling valve and moved away from the place. Around 07:40 hrs, with dense white fumes came out of the manhole cover as the same had opened out.

All the employees including the outsourced helpers who were working in 2nd floor, 1st floor and the ground floor came down to the ground floor adjacent area.

However, 2 employees and 4 outsourced helpers who were, working on the third floor ran to the terrace. In that one employee and three helpers, who again attempted to come down, fainted nearer to the terrace staircase. They all were evacuated from the site and taken to hospital, where all the four of them passed away. Remaining 2 employees, who were staying near the terrace water tank, came down to the ground floor adjacent area, at around 07:50 hrs, when the fumes subsided.

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Cuddalore, Tamil Nadu - 607 005.**

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CIN:U24299TN2016PTC111396



CRIMSUN ORGANICS PRIVATE LTD

Apart from the above four people, total 11 people were there in the plant at the time of incident and 1 safety steward went for the rescue of the people. All these 12 people were sent to hospital for treatment and got discharged.

Preliminary investigation indicates the probable cause of the incident could be as malfunction of steam valve, which could have led to the pressure raise in the reactor and hence the leakage of the fumes. Detailed investigation is being carried out.

Thanking you.

Yours faithfully,

For M/s Crimsun Organics Private Limited,

A handwritten signature in blue ink, appearing to read 'S. Ramesh Prabakaran'.



S. Ramesh Prabakaran
Managing Director.

Copy to

1. The Additional Director of Industrial Safety and Health, Trichy.
2. The Joint Director of Industrial Safety and Health, Cuddalore.

**Regd. Office / Works : C-9, C-10 & C-11, SIPCOT Industrial Complex, Kudikadu,
Cuddalore, Tamil Nadu - 607 005.**

Phone : 04142-239777, E-mail : info@crimsunorganics.com

CIN:U24299TN2016PTC111396

ந.க.ஆ2/1/2021.
நாள்:13.05.2021.

ANNEXURE-D

வட்டாட்சியர் அலுவலகம்,
கடலூர்.

அமைதி பேச்சுவார்த்தை கூட்ட நடவடிக்கைகள்.

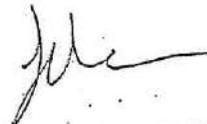
கடலூர் வட்டம், மஞ்சக்குப்பம் குறுவட்டம், குடிகாடு கிராமம், சிப்காட் தொழிற்பேட்டையில் இயங்கிவரும் க்ரிம்ஸன் ஆர்கானிக் பி.லிட் நிறுவனத்தில் 13.05.2021 இன்று காலை 07.04 மணியளவில், வடிகட்டும் உலை கலன் சரியாக இயங்காத காரணத்தினால், விபத்திற்குள்ளாகி வாயு தாக்கியதில் அந்நிறுவனத்தில் பணிபுரிந்த ஊழியர்களில் பதினேழு நபர்கள் மூச்சு திணறல் ஏற்பட்டு கடலூர் மாவட்ட அரசு தலைமை மருத்துவமனையில் சிகிச்சைக்காக அனுமதிக்கப்பட்டனர். இவர்களில் 4 நபர்கள் இறந்துவிட்டனர். இவ்விபத்து தொடர்பாக நிறுவனம் சார்பாக இழப்பீட்டு தொகை வழங்கக் கோரி கடலூர் வருவாய் வட்டாட்சியர் அலுவலகத்தில் வருவாய் கோட்டாட்சியர் தலைமையில் அமைதி பேச்சுவார்த்தைக் கூட்டம் நடைபெற்றது.

கூட்டத்தில் கலந்து கொண்டவர்கள் விவரம்:

1. வருவாய் கோட்டாட்சியர், கடலூர்
2. காவல் துணை கண்காணிப்பாளர், கடலூர்
3. காவல் உதவி கண்காணிப்பாளர், கடலூர்
4. வருவாய் வட்டாட்சியர், கடலூர்
5. வருவாய் ஆய்வாளர், மஞ்சக்குப்பம் குறுவட்டம்
6. ரமேஷ் பிரபாகர், மேனேஜிங் டைரக்டர், க்ரிம்ஸன் ஆர்கானிக் பி. லிட். நிறுவனம்
7. பரணிதரன், இயக்குநர், க்ரிம்ஸன் ஆர்கானிக் பி. லிட். நிறுவனம்
8. குமார், (PRO)
9. பா.தாமரைச்செல்வன், கடலூர் விடுதலைச் சிறுத்தைகள் கட்சி
10. RKL.சிவக்குமார், ஈச்சங்காடு, சிப்காட்
11. சன். முத்துகிருஷ்ணன், மாவட்ட கவுன்சிலர்
12. V.சிவக்குமார், தலைவர், குடிகாடு
13. R.P.துரை, முன்னாள் ஊராட்சி மன்ற தலைவர்
14. கோ.சந்திரசேகரன், மாநில இணைச்செயலாளர், பா.ம.க.
15. கலியமூர்த்தி, காரைக்காடு,
16. செல்வகுமார்,
17. T.ராமலிங்கம்
18. ஏ.சிவமணி
19. ரவி
20. எஸ்.முருகன்
21. எஸ்.சிவக்குமார்

பேச்சுவார்த்தைக் கூட்டத்தில் எடுக்கப்பட்ட முடிவுகள்

1. வாயு தாக்கியதில் இறந்த நபர்களுக்கு கம்பெனி இழப்பீடாக நபர் ஒன்றிற்கு ஒரு கோடி ரூபாய் இழப்பீடாக வழங்குமாறு பாதிக்கப்பட்டவர்கள் சார்பாக கேட்கப்பட்டதில் கம்பெனி சார்பாக இறந்த 4 நபர்களுக்கும் நபர் ஒன்றுக்கு 15 லட்சம் ரூபாய் வீதம் 4 நபர்களுக்கு மொத்தம் 60 லட்சம் ரூபாய் இழப்பீடாக அவர்களின் வாரிசுதாரர்களுக்கு வழங்க முடிவெடுக்கப்பட்டு கம்பெனி சார்பாக உறுதியளிக்கப்பட்டது. இதனை இருதரப்பினரும் ஏகமனதாக ஏற்றுக்கொண்டனர்.
2. காயமடைந்து மருத்துவமனையில் சிகிச்சை பெற்றுவரும் 13 நபர்களுக்கு நபர் ஒன்றுக்கு ரூ.10,000/- ஆறுதல் உதவித்தொகை வழங்க கம்பெனி சார்பாக உறுதியளிக்கப்பட்டது. இதனை இருதரப்பினரும் ஏகமனதாக ஏற்றுக்கொண்டனர்.
3. சிகிச்சை பெற்று வரும் நபர்கள் சிகிச்சை முடிவுற்றவுடன் ஏற்கனவே பணிபுரந்த ஒப்பந்த அடிப்படையில் மீள அவர்களுக்கு பணி வழங்கப்படும் என உறுதியளிக்கப்பட்டதை இரு தரப்பினரும் ஏக மனதாக ஏற்றுக்கொண்டனர்.
4. மேலும், மருத்துவமனையில் சிகிச்சை பெற்றுவரும் நபர்களுக்கு உயர் சிகிச்சை தேவைப்பட்டால் நிறுவனம் முழுமையாக அத்தொகையை ஏற்றுக் கொள்வதாக உறுதியளிக்கப்பட்டதை இரு தரப்பினரும் ஏக மனதாக ஏற்றுக்கொண்டனர்.
5. இறந்துவிட்ட நபர்களின் வாரிசுதாரர்களில் எவரேனும் ஒருவருக்கு தகுதியின் அடிப்படையில் ஒப்பந்த அடிப்படையில் பணி வழங்கப்படும் என உறுதியளிக்கப்பட்டது. மேற்கண்ட ஷரத்துக்களின்படி இருதரப்பினரும் ஏற்பளிப்பு செய்து கையொப்பமிட்டதின் அடிப்படையில் இந்த அமைதிப் பேச்சுவார்த்தைக் கூட்டம் சமூகமாக முடிவுற்றது.


 டி. அ. சிவசுந்தரன்
 உறுதிப்படுத்தும் கமிட்டி


 D. A. Sivan
 Ex. 2014/15/1/1/1/1
 சிவசுந்தரன்


 T. A. S. Sivan
 Ex. 2014/15/1/1/1/1
 சிவசுந்தரன்


 13/5/2021
 S. Ramesh Prabhakar
 Managing Director
 M/s. Consun Systems Pvt. Ltd.


 13.5.21
 A. PARAMAHARAN
 Director,
 Consun Systems Pvt. Ltd.

3 - சி. பி. சிவசுந்தரன்
 டி. அ. சி.

4. V. சி. சிவசுந்தரன்
 உறுதிப்படுத்தும் கமிட்டி
 சிவசுந்தரன்

TRUE TYPED COPY

5432/1/2021
Date: 13.05.2021.

Governor's Office, Coast. Cuddalore Circle
Cuddalore Circle

Peace Talks Meeting Activities.

Cuddalore Circle, Panchakkuppam Sub Circle, Kudikadu Village, SIPCOT Industrial Estate, Crimsun Organics P Ltd, This morning (13.05.2021) at 07.04 hrs, due to malfunction of the distillation vessel, the employees who worked in the company were 17 persons injured in the accident and admitted in the hospital for treatment. There have been 4 persons died in the hospital. A meeting was held at the Revenue Commissioner's Office in Cuddalore on behalf of the Corporation to seek compensation on behalf of the company.

Details of those present at the meeting:

1. Revenue Commissioner, Cuddalore
2. Superintendent of Police, Cuddalore
3. Assistant Superintendent of Police, Cuddalore
4. Revenue Commissioner, Cuddalore
5. Revenue Inspector, Manjakuppam, Cuddalore.
6. Ramesh Prabakaran, Crimsun Organics P Ltd
7. Paranitharan, Director Operations, Crimsun Organics P Ltd
8. Kumar PRO
9. P. Tamariselvan, Cuddalore -DPI Parti
10. RKL . Sivakumar, Ichchankadu, SIPCOT
11. C, Muthukrisharan, Dist Councillor
12. V. Sivakumar, President, Kudikadu
13. RP Durai, Former Panchayat President
14. K. Chandrasekaran, District Deputy Secretary, P.M.K.
15. Kaliyamurthy, Karikadu,
16. Selvakumar,
17. T. Ramalingam
18. A. Sivamani
19. Ravi |
20. S. Murugan
21. S, Sivakumar

Decisions taken at the Negotiation Meeting

1. In the case of one crore rupees to be paid as compensation to the Company for blood loss to persons affected by the gas attack, it was decided on behalf of the Company to pay 15 Lakhs for these 4 persons each on behalf of the victims to pay a maximum of Rs.60lakhs. This was unanimously accepted by both parties.
2. The company has promised to provide a consolation allowance of Rs. 10,000 / - per person to 13 persons who are being treated in 2 injured hospitals. This was unanimously accepted by both parties.
3. Both parties unanimously agreed that the receiving treatment would be offered the job on the basis of a contract already in place with the termination of treatment.
4. In addition, both parties agreed to the company's promise to fully accept the full amount if individuals receiving treatment for require higher treatment.

5. It was promised that any of the heirs of the deceased persons would be offered employment on contract basis on merit. The peace talks are based on the terms and conditions of the agreement between the two parties.

Sd/-

Sd/-

அனுப்பநர்:
திரு.பா.அருண்சத்யா.பி.இ.,
மாவட்ட ஆட்சியர் (பொ) மற்றும்
மாவட்ட வருவாய் அலுவலர்,
கடலூர்

பெறுநர்:
நிறுவனர்,
க்ரீம்ஸன் ஆர்கானிக் பி.லிட். நிறுவனம்
சிப்காட், குடிகாடு, கடலூர்

ந.க.எண்: டபிள்யு5/16341/2021 நாள்:18.05.2021

ஆய்வா,

பொருள்: தேசிய துப்புரவு மறு வாழ்வு ஆணையத்தின் ஆந்திரா மற்றும் தமிழ்நாடு மாநிலங்களுக்கான தலைவர் மாண்புமிகு. திரு. எம். வெங்கடேசன் அவர்கள் 13.05.2021 அன்று காலை 7.30 மணிக்கு நடந்த விபத்தில் 4 நபர்கள் இறந்தது குறித்தும் மற்றும் க்ரீம்ஸன் ஆர்கானிக் பி.லிட். நிறுவனத்தினை ஆய்வு செய்வது தொடர்பாகவும் 20.05.2021 அன்று கடலூர் மாவட்டத்திற்கு வருகை புரிவது - தொடர்பாக

பார்வை: பகுடில்லி தேசிய துப்புரவு மறுவாழ்வு ஆணையத்தின் கடிதம்
எண்: 20012/01/HCP/2021-Admn/2001 நாள்:17.05.2021

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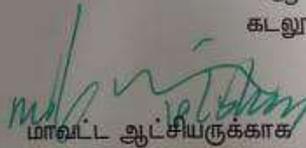
பார்வையில் காணும் கடிதத்தினமீது தங்களின் கவனத்தினை ஈர்க்க விழைக்கிறேன்.

தேசிய துப்புரவு மறுவாழ்வு ஆணையத்தின் ஆந்திரா மற்றும் தமிழ்நாடு தலைவர் மாண்புமிகு. திரு.எம்.வெங்கடேசன் அவர்கள் கடலூர் மாவட்டத்தில் 13.05.2021 அன்று காலை 7.30 மணிக்கு நடந்த விபத்தில் 4 நபர்கள் இறந்தது குறித்தும் மற்றும் க்ரீம்ஸன் ஆர்கானிக் பி.லிட். நிறுவனத்தினை ஆய்வு செய்வது தொடர்பாகவும் 20.05.2021 அன்று கடலூர் மாவட்டத்திற்கு வருகை தரவுள்ளார். எனவே, 13.05.2021 அன்று நடைபெற்ற அமைதி பேச்சு வார்த்தை கூட்டத்தின் போது வருவாய் கோட்டாட்சியர் முன்னிலையில் பாதிப்பில் இறந்த 4 நபர்களின் வாரிசுதாரர்களுக்கு வழங்க உறுதியளிக்கப்பட்ட தீருதவி தொகை ரூ. 15.00 இலட்சத்தினை பின்வரும் இணைப்பில் உள்ளவாறு DEMAND DRAFT - ஐ 19.05.2021 அன்று மாலைக்குள் கடலூர் வருவாய் வட்டாட்சியர்/ வருவாய் கோட்டாட்சியரிடம் ஒப்படைக்குமாறும் மற்றும் ஆய்வின் போது உடனிருக்குமாறு கேட்டுக்கொள்கிறேன்.

இணைப்பு:
வாரிசுதாரர்களின் விவரம்

ஓம்/ பா.அருண்சத்யா
மாவட்ட ஆட்சியர் (பொ)
கடலூர்

/உ.ந.உ.ப./


மாவட்ட ஆட்சியருக்காக

சி.ஆ.
18/5/21

திரு ராஜ்குமார் த/பெ ராஜேந்திரன் வாரிசு விவரம்:

| வ.எண் | பெயர் | உறவுமுறை | வயது | தொகை |
|---------|----------------|----------|------|---|
| 1) | திருமதி பிரேமா | மனைவி | 35 | ரூ.1,87,500/- |
| 2) | வாணிபூர் | மகள் | 6 | ரூ.5,50,000/- (நிரந்தர வைப்பீட்டு கணக்கில்) |
| 3) | வேலன் | மகள் | 1 | ரூ.5,50,000/- (நிரந்தர வைப்பீட்டு கணக்கில்) |
| 4) | அமுதா | தாய் | 55 | ரூ.1,87,500/- |
| மொத்தம் | | | | ரூ.14,75,000/- |

திரு கணபதி, த/பெ.கருணாகரன் வாரிசு விவரம்:

| வ.எண் | பெயர் | உறவுமுறை | வயது | தொகை |
|---------|------------------|----------|------|----------------|
| 1) | திரு.கருணாகரன் | தந்தை | 47 | ரூ.7,37,500/- |
| 2) | திருமதி.பூரீதேவி | தாய் | 40 | ரூ.7,37,500/- |
| மொத்தம் | | | | ரூ.14,75,000/- |

திரு.விஜேஷ்ராஜ், த/பெ.விஜயகுமார் வாரிசு விவரம்:

| வ.எண் | பெயர் | உறவுமுறை | வயது | தொகை |
|---------|------------|----------|------|----------------|
| 1) | விஜயகுமார் | தந்தை | 58 | ரூ.7,37,500/- |
| 2) | சுலோசனா | தாய் | 51 | ரூ.7,37,500/- |
| மொத்தம் | | | | ரூ.14,75,000/- |

திருமதி. சவிதா க/பெ செந்தில்குமார் வாரிசு விவரம்

| வ.எண் | பெயர் | உறவுமுறை | வயது | தொகை |
|---------|-----------------------|----------|------|---|
| 1) | திரு.செந்தில்குமார் | கணவர் | 40 | ரூ.1,75,000/- |
| 2) | செல்வன்.சந்தோஷ்குமார் | மகன் | 16 | ரூ.6,50,000/- (நிரந்தர வைப்பீட்டு கணக்கில்) |
| 3) | செல்வி.ஜாஸ்மின் | மகள் | 13 | ரூ.6,50,000/- (நிரந்தர வைப்பீட்டு கணக்கில்) |
| மொத்தம் | | | | ரூ.14,75,000/- |

TRUE TYPED COPY

| | |
|--|---|
| <p>From:</p> <p>Mr.P.Arunsathya, B.E.,</p> <p>District Collector (In-Charge)</p> <p>and District Revenue Officer,</p> <p>Cuddalore</p> | <p>To:</p> <p>Founder,</p> <p>Crimson Organic Pvt.Ltd. Company</p> <p>Sipcot, Kudikadu, Cuddalore</p> |
|--|---|

Current Account Number: W5 /16341/2021 Date: 18.05.2021

Sir,

Subject: Regarding the inspection to be conducted at Crimson Organic Pvt.Ltd by Hon'ble Chairman of the National Sanitation and Rehabilitation Commission for the States of Andhra Pradesh and Tamil Nadu, Mr. M.Venkatesh to investigate the death of 4 persons in the accident which took place at 7.30 am on 13.05.2021 and visit to be held at Cuddalore district on 20.05.2021.

View: New Delhi National Sanitation and Rehabilitation Commission Letter
No: 20012/01/ HCP/ 2021-Admn/2001 Date: 17.05.2021

To draw their attention to the letter they see in view.

The Hon'ble Andhra and Tamil Nadu Chairman of the National Sanitation and Rehabilitation Commission, Mr. M. Venkatesh, will visit Cuddalore District on 20.05.2021 to inquire into the deaths of 4 persons in an accident that occurred at 7.30 am on 13.05.2021 in Cuddalore District and to inspect the Crimson Organic Pvt Ltd Company. Therefore, as per the reconciliation discussion held on 13.05.2021 in front of the the revenue officer, I request to handover the DEMAND DRAFT of Rs. 15 Lakhs to Cuddalore Revenue Officer / Revenue Inspector by evening on 19.05.2021 as promised, as quoted in the following attachment for the heirs of the 4 persons affected by the accident and requesting to join during the inspection.

Attachment:

Om / P. Arunsathya

Details of heirs
Cuddalore

District Collector (In-Charge)

For The District Collector

Thiru Rajkumar S/o Rajendran heir information:

| S.No | Name | Relation | Age | Amount |
|-------|------------|----------|-----|--|
| 1) | Tmt. Prema | Wife | 35 | Rs.1,87,500/- |
| 2) | Vaanishree | Daughter | 6 | Rs.5,50,000/- (Fixed Deposit Account) |
| 3) | Velan | Son | 1 | Rs.5,50,000/- (Fixed Deposit Account) |
| 4) | Amutha | Mother | 55 | Rs.1,87,500/- |
| Total | | | | Rs.14,75,000/- |

Thiru Ganapathy, S/o Karunakaran heir information:

| S.No | Name | Relation | Age | Amount |
|-------|-----------------------|----------|-----|----------------|
| 1) | Thiru. Karunakaran | Father | 47 | Rs.7,37,500/- |
| 2) | Tmt. Sridevi | Mother | 40 | Rs.7,35,500/- |
| Total | | | | Rs.14,75,000/- |

Thiru. Vijeshraj, S/o. Vijayakumar heir information:

| S.No | Name | Relation | Age | Amount |
|-------|-------------|----------|-----|----------------|
| 1) | Vijayakumar | Father | 58 | Rs.7,35,000/- |
| 2) | Sulochana | Mother | 51 | Rs.7,35,000/- |
| Total | | | | Rs.14,75,000/- |

Tmt.Savitha W/o` Senthilkumar heir information:

| S.No | Name | Relation | Age | Amount |
|------|--------------------------|----------|-----|--|
| 1) | Thiru. Senthilkumar | Husband | 40 | Rs.1,75,000/- |
| 2) | Master. Santhoshkumar | Son | 16 | Rs.6,50,000/- (Fixed Deposit Account) |
| 3) | Ms. Jasmin | Daughter | 13 | Rs.6,50,000/- |

| | | | | |
|-------|--|--|--|-------------------------|
| | | | | (Fixed Deposit Account) |
| Total | | | | Rs.14,75,000/- |



தமிழ்நாடு தமில்நாடு TAMILNADU

20.5.2021

CD 286775

CRIMSON ORNAMENTS PVT. LTD

S. Per
D. RADHAKRISHNAN
STAMP VENDOR

SIPCOY, COBBA ME.5

L NO:14/97.

Manjakuppam, Guddalore
Tamilnada.

கருணைத் தொகை செட்டில்மெண்ட் ரசீது

இந்த கருணைத் தொகை ஒப்பந்தம், மே 20, 2021 ஆம் ஆண்டு, தமிழ்நாடு, கடலூரில் கீழ்க்கண்ட இரண்டு தரப்பினருக்கிடையே செய்யப்பட்டுள்ளது (கருணைத் தொகை ஒப்பந்த ரசீது)

சி - 9, சி-10 மற்றும் சி-11 சிப்காட் தொழில் வளாகம், குடிக்காடு, கடலூர் தமிழ்நாடு - 607005 இந்தியா, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் நிறுவனத்தின், நிர்வாக இயக்குனர் திரு. ரமேஷ் பிரபாகரன் மூலம், (இதன் பின்னர் "முதலாவது பார்ட்டி" அல்லது "நிறுவனம்" என்று குறிப்பிடப்படும், அதன் பொருள் அல்லது சூழல் அல்லது அர்த்தத்திற்கு வேறுவிதத்தில்

கருணைத் தொகை

1

20-05-2021

சொல்லப்பட்டால் ஒழிய, அதன் பின்வருபவர்கள் மற்றும் நியமிப்பாளர்களை உள்ளடக்கும்) முதலாவது பகுதியாகவும்;

மற்றும்

திரு கணபதியின் தாயார் 40 வயதான திரு. ஸ்ரீதேவி;

இதன் பின்னர் கூட்டாக "இரண்டாவது பார்ட்டிகள்" என்று குறிப்பிடப்படுவார்கள், அதன் பொருள் அல்லது சூழல் அல்லது அர்த்தத்திற்கு வேறுவிதத்தில் சொல்லப்பட்டால் ஒழிய, அவர்களின் வாரிசுகள், பின்வருபவர்கள் மற்றும் நியமிப்பாளர்களை உள்ளடக்கும்) ஆகியோர் இரண்டாவது பகுதியாகவும்

இந்நிலையில், 13.05.2021 அன்று, திரு. கணபதி, வயது 25, த/பெ கருணாகரன், அவர்கள், ஜே.கே.எஸ் ஒப்பந்தத்தின் கீழ், பிளாட் நம்பர்: சி-9, 10, 11, சிப்காட் தொழில் வளாகம், குடிக்காடு கிராமம், கடலூர் டவுன், கடலூர் வட்டம், தமிழ்நாடு, கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் இல் அமைந்துள்ள நிறுவனத்தின் தொழிற்சாலையில் ஒரு ஆப்ரேட்டர் உதவியாளராக ஆக பணிபுரிந்து வந்தார்.

மற்றும் இந்நிலையில், இறந்து போன ஊழியர் 13.05.2021 அன்று தொழிற்சாலையில் நடந்த விபத்திற்குப் பின்னர் காலமானார். விபத்தில் இறந்த ஊழியர் ஈ.எஸ்.ஐ.சி-இன் கீழ் தகுதி பெறுகிறார் (ஐபி எண் : 5131607786)

மற்றும், இரண்டாம் பகுதியின் பார்ட்டிகள், இறந்தவரின் வாரிசுகள் மற்றும் பிரதிநிதிகள் தாங்களே என குறிப்பிடுகின்றனர்;

மற்றும், பார்ட்டிகள் தங்கள் பிரதிநிதிகள் மூலம், 13.05.2021 அன்று கடலூர் வருவாய்க் கோட்ட அலுவலர் அலுவலகத்தில் வருவாய்



← K. கருணாகர்

← K. ஸ்ரீதேவி

அதிகாரிகள் முன்னிலையில், முதல் பார்ட்டி ரூ.15,00,000/- (ரூபாய் பதினைந்து லட்சம் மட்டும்) மொத்தத் தொகையை இரண்டாம் பகுதி பார்ட்டிகளின் அனைத்து கிளைகளுக்கும் முழுமையாகவும் இறுதி செட்டில்மென்ட்டாகவும், கீழே கொடுக்கப்பட்டுள்ள விதிமுறைகள் மற்றும் நிபந்தனைகளின் அடிப்படையில் செலுத்துவார்கள் என்று ஒப்புக் கொண்டனர்;

மற்றும் கடலூர் மாவட்ட ஆட்சியர் வெளியிட்ட, 18.05.2021 தேதியிட்ட ஒரு கடிதத்தில், மேற்கண்ட செட்டில்மென்ட் ஏற்பாட்டைக் குறிப்பிட்டு, இரண்டாம் பகுதி பார்ட்டிகளின் விவரங்களையும் அதில் குறிப்பிட்டு, இரண்டாம் பகுதி பார்ட்டிகளுக்கு ஆதரவாக செட்டில்மென்ட் தொகையை செலுத்துமாறு கோரியுள்ளார், ;

இப்போது, எனவே, இந்த ஒப்பந்தம் பின்வருவற்றை குறிப்பிடுகிறது:-

1. திரு. கனபதியின் சட்டபூர்வ வாரிசுதாரர்கள் மற்றும் பிரதிநிதிகள் தாங்கள் தான் என்றும், இறந்தவரின் எதேனும் உயில் அல்லது ஏற்பாட்டின் கீழும் வேறு எந்தவொரு சட்டபூர்வ வாரிசு அல்லது பயனாளியும் இல்லை என்பதையும் இரண்டாவது பகுதியின் பார்ட்டிகள் குறிப்பிடுகின்றன.
2. இந்தப் பிரதிநிதித்துவத்தின் அடிப்படையில், முதல் பார்ட்டி இதன் மூலம், எவ்வித தீங்கும் பாரபட்சமுமின்றி, இரண்டாம் பகுதியின் பார்ட்டிகளுக்கு ரூ.15,00,000/- (ரூபாய் பதினைந்து லட்சம் மட்டும்) கீழ்க்கண்டபடி மொத்தமாக செலுத்துகின்றனர்:



ரூ.15,00,000/-

ரூ.15,00,000/-

| வரிசை எண் | பணம் பெறுபவரின் முழுப் பெயர் | அளிக்கப்பட்ட தொகை (எழுத்துக்களாலும் எண்களாலும்) | பணம் செலுத்திய முறை | வரைவோலை எண் / காசோலை எண் & தேதி |
|-----------|------------------------------|---|---------------------|--|
| 1. | திரு. கருணாகரன் | 12500 (பன்னிரண்டாயிரத்து ஐநூறு மட்டும்) | ரொக்கம் | பொருந்தாது |
| 2. | திருமதி. ஸ்ரீதேவி | 12500 (பன்னிரண்டாயிரத்து ஐநூறு மட்டும்) | ரொக்கம் | பொருந்தாது |
| 3. | திரு. கருணாகரன் | 7,37,500/- (ஏழு லட்சத்து முப்பத்தி ஏழாயிரத்து ஐநூறு) | டி.டி | ஐசிஐசிஐ வங்கி, கடலூர் 19.05.2021 தேதியிட்ட டி.டி எண்: 501170 |
| 4. | திருமதி. ஸ்ரீதேவி | 7,37,500/- (ஏழு லட்சத்து முப்பத்தி ஏழாயிரத்து ஐநூறு) | டி.டி | ஐசிஐசிஐ வங்கி, கடலூர் 19.05.2021 தேதியிட்ட டி.டி எண்: 501171 |

- இரண்டாவது பகுதியின் பார்ட்டிகள் பணம் பெற்றுக்கொண்டதை உறுதிப்படுத்துகின்றனர்.
- மேற்கண்ட தொகைகள் இரண்டாவது பகுதியின் அனைத்து பார்ட்டிகளின் கிளைம்களுக்கும் முழுமையான மற்றும் இறுதி செட்டில்மென்ட்டாக வழங்கப்படுகின்றன.
- மேற்கண்ட தொகைகளைப் பெற்றவுடன், இரண்டாம் பகுதி பார்ட்டிகள் முதல் பார்ட்டிக்கு எதிராக எந்த வகையான கிளைம்களையும் கொண்டிருக்கவில்லை.



ர.ந. கருணாகரன்

க.ஸ்ரீதேவி

6. இரண்டாம் பகுதியின் பார்ட்டிகள் தங்கள் கிளைம்கள் அனைத்தும் இந்த ஒப்பந்தத்தின் மூலம் தீர்க்கப்பட்டன என்பதை ஒப்புக்கொள்கின்றன. அனைத்து பார்ட்டிகளும் உண்மையுடன் தங்கள் கடமைகளை கடைப்பிடிக்க வேண்டும் மற்றும் செயலாற்ற வேண்டும் என்று மேலும் ஒப்புக் கொள்ளப்படுகிறது.
7. மாநில வருவாய் அதிகாரிகளின் முன்னிலையில், மற்றும் அவர்களின் உதவியுடன், பார்ட்டிகள் எவ்வித வற்புறுத்தலும் இன்றி தாமாக முன்வந்து இந்த ஒப்பந்தத்திற்கு சம்மதித்துள்ளன.

கீழ்க்கண்ட சாட்சிகள் முன்னிலையில், பார்ட்டிகள் இந்த எழுத்துப்பூர்வ ஒப்பந்தத்தில் 20.05.2021 அன்று கையெழுத்திட்டனர்

கிரிம்சன் ஆர்கானிக்ஸ்
பிரைவேட் லிமிடெட் சார்பாக



செந்துர்பாண்டியன்
ரமேஷ்பிரபகரன்
நிர்வாக இயக்குநர்
டி.ஐ.என்: 05339640

பு.கருணாகரன்

(திரு கருணாகரன்)

வயது: 47

முகவரி:

ஆதார் எண் :

ஸ்ரீதேவி

(திருமதி. ஸ்ரீதேவி)

வயது: 40

முகவரி:

ஆதார் எண் :.

பு.கருணாகரன்

ஸ்ரீதேவி

கீழ்க்கண்ட சாட்சிகள் முன்னிலையில்:-

1. கையொப்பம்: *Srinivasan*

முழு பெயர் : R. Srinivasan .

வயது:

முகவரி:

ஆதார் எண் :

2. கையொப்பம்: *Uma*

முழு பெயர் : *Uma N*

வயது: *54 Sangarikkuppam & Post*

முகவரி: *Cuddalore*

ஆதார் எண் :

ர.ப. கிருணாகரன்

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← 15.08.2021

<<TRUE TYPED COPY>>

Compensation settlement receipt

Compensation agreement , May 20,2021 Tamil Nadu made between the following parties (Compensation Receipt)

C-8,C-10 & C-11, Sipcot Industrial Estate, Kudikkadu, Cuddalore Tamil Nadu- 607 005, Crimsun Organics Pvt Ltd the company's Managing Director (Hereafter referred to as First Party or Company) unless or otherwise stated in terms of its meaning or context or meaning including their heirs , successors and appointees are first party.

And

Mr.Ganapathy's Mother age 40 Mrs. Sridevi.

Then collectively referred to as second party, unless or otherwise stated in terms of its meaning or context or meaning including their heirs , successors and appointees are second part.

In this case, on 13.05.2021, Mr. Ganapathy has worked as Assit Operator under JKS Contract in Float No C9,C10&C11 Crimsun Organics Pvt Ltd, Sipcot industrial Estate , Kudickkadu, Village Cuddalore , Tamil Nadu.

And in the case deceased employee died after an accident at the factory on 13.05.2021. Contract worker who died on accident was eligible for ESIC No. 5131607786.

And in the second part, parties of legal heirs of deceased was themself mentioned.

Party's through their representatives, on 13.05.2021 Cuddalore Revenue Divisional office in presence of Divisional officer , 1st party has agreed to pay to a sum of Rs.15,00,000/- (Fifteen Lakhs Only) to 2nd party as full & final settlement, on the below mentioned terms and conditions , the amount will be paid.

And in a letter dated 18.05.2021 issued by the cuddalore district collector mentioning the above settlement arrangement and the details mentioned and requested to pay settlement in favour of second party.

Therefore the agreement specifies the following.

1) Mr.Ganapathy's legal heirs and representatives are themself and there is no other legal heir or beneficiary's for the deceased member which was produced by the second party.

2) On the basis of representation, the first part thereby without any harm or discrimination, Rs.15,00,000/- will pay the amount to the second party.

| Sl.No | Recipient Full Name | Amount | Amount Paid Through | DD No / cheque No |
|-------|---------------------|--|---------------------|--|
| 1 | Mr.Karunagaran | Rs.12500 (Rupees Twelve Thousand and Five Hundred Only) | Cash | NA |
| 2 | Mrs.Sridevi | Rs.12500 (Rupees Twelve Thousand and Five Hundred Only) | Cash | NA |
| 3 | Mr.Karunagaran | Rs.7,37,500/- (Rupees Seven Lakhs Thirty Seven Thousand and Five Hundred Only) | DD | ICICI Bank, Cuddalore dated 19.05.2021, DD No.501170 |
| 4 | Mrs.Sridevi | Rs.7,37,500/- (Rupees Seven Lakhs Thirty Seven Thousand and Five Hundred Only) | DD | ICICI Bank, Cuddalore dated 19.05.2021, DD No.501171 |

3) The second party has confirmed the above payment

4) The above claim amount has been settle as full and final settlement.

5) Upon the receipt of the above claim, the 2nd party shall not make any claim against the first Party.

6) The 2nd party has agreed that all the claim have been settled by this agreement. It is further agreed that all parties must faithfully in discharge and perform their duties.

7) In presence of Revenue officer and with their assistance, the parties have voluntarily came and agreed to this settlement without any coercion.

In presence of the following witness, the parties has signed this agreement on 20.05.2021

On behalf of Crimsun Organics

Senturapandian Ramesh

Mr.Karunagaran

(Managing director)

Age : 47

Address :

Aadhar No.

Mrs. Sridevi

Age :40

Address:

Aadhar No.

Below witness

Signature

Full Name: R.Srinivasan

Age:

Address

Aadhar No.

Signature

Full Name: N.Kumaran

Age:

Address: Sangalikuppam

Aadhar No.



தமிழ்நாடு தமில்நாடு TAMILNADU 20.5.2021

CRIMSON ORGANICS PVT. LTD

SIPCOT, CUMBALURU-5

CD 286773

S. KADHAKRISHNAN
STAMP VENDOR

L. NO:14/97

Chennai, Cuddalore-1
Tamilnadu

கருணைத் தொகை செட்டில்மெண்ட் ரசீது

இந்த கருணைத் தொகை ஒப்பந்தம், மே 20, 2021 ஆம் ஆண்டு, தமிழ்நாடு, கடலூரில் கீழ்க்கண்ட இரண்டு தரப்பினருக்கிடையே செய்யப்பட்டுள்ளது (கருணைத் தொகை ஒப்பந்த ரசீது)

சி - 9, சி-10 மற்றும் சி-11 சிப்காட் தொழில் வளாகம், குடிக்காடு, கடலூர் தமிழ்நாடு - 607005 இந்தியா, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் நிறுவனத்தின், நிர்வாக இயக்குனர் திரு. ரமேஷ் பிரபாகரன் மூலம், (இதன் பின்னர் "முதலாவது பார்ட்டி" அல்லது "நிறுவனம்" என்று குறிப்பிடப்படும், அதன் பொருள் அல்லது சூழல் அல்லது அர்த்தத்திற்கு வேறுவிதத்தில்

← R.S.B. 17

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← R.S.B. 17

சொல்லப்பட்டால் ஒழிய, அதன் பின்வருபவர்கள் மற்றும் நியமிப்பாளர்களை உள்ளடக்கும்) முதலாவது பகுதியாகவும்;

மற்றும்

திரு. ராஜ்குமாரின் மனைவி 35 வயதான திருமதி. பிரேமா

திரு. ராஜ்குமாரின் மைனர் மகள் வாணி ஸ்ரீ, வயது 6, அவரது பாதுகாவலர் திருமதி. பிரேமா மூலம்;

திரு. ராஜ்குமாரின் மைனர் மகன் வேலன், அவரது பாதுகாவலர் திருமதி. பிரேமா மூலம்;

திரு. ராஜ்குமாரின் தாயார் அமுதா, வயது 55;

இதன் பின்னர் கூட்டாக "இரண்டாவது பார்ட்டிகள்" என்று குறிப்பிடப்படுவார்கள், அதன் பொருள் அல்லது சூழல் அல்லது அர்த்தத்திற்கு வேறுவிதத்தில் சொல்லப்பட்டால் ஒழிய, அவர்களின் வாரிசுகள், பின்வருபவர்கள் மற்றும் நியமிப்பாளர்களை உள்ளடக்கும்) ஆகியோர் இரண்டாவது பகுதியாகவும்

இந்நிலையில், 13.05.2021 அன்று, திரு. ராஜ்குமார், வயது 42, த/பெ ராஜேந்திரன், அவர்கள், ஜே.கே.எஸ் ஒப்பந்தத்தின் கீழ், பிளாட் நம்பர்: சி-9, 10, 11, சிப்காட் தொழில் வளாகம், குடிக்காடு கிராமம், கடலூர் டவுன், கடலூர் வட்டம், தமிழ்நாடு கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் இல் அமைந்துள்ள நிறுவனத்தின் தொழிற்சாலையில் ஒரு ஆப்ரேட்டர் உதவியாளராக ஆக பணிபுரிந்து வந்தார்.

மற்றும் இந்நிலையில், இறந்து போன ஊழியர் 13.05.2021 அன்று தொழிற்சாலையில் நடந்த விபத்திற்குப் பின்னர் காலமானார். விபத்தில் இறந்த ஊழியர் ஈ.எஸ்.ஐ.சி-இன் கீழ் தகுதி பெறுகிறார் (ஐபி எண் : 5130950435)



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← R. S. S. S. S.

← R. S. S. S.

மற்றும், இரண்டாம் பகுதியின் பார்ட்டிகள், இறந்தவரின் வாரிசுகள் மற்றும் பிரதிநிதிகள் தாங்களே என குறிப்பிடுகின்றனர்;

மற்றும், பார்ட்டிகள் தங்கள் பிரதிநிதிகள் மூலம், 13.05.2021 அன்று கடலூர் வருவாய்க் கோட்ட அலுவலர் அலுவலகத்தில் வருவாய் அதிகாரிகள் முன்னிலையில், முதல் பார்ட்டி ரூ.15,00,000/- (ரூபாய் பதினைந்து லட்சம் மட்டும்) மொத்தத் தொகையை இரண்டாம் பகுதி பார்ட்டிகளின் அனைத்து கிளைகளுக்கும் முழுமையாகவும் இறுதி செட்டில்மென்ட்டாகவும், கீழே கொடுக்கப்பட்டுள்ள விதிமுறைகள் மற்றும் நிபந்தனைகளின் அடிப்படையில் செலுத்துவார்கள் என்று ஒப்புக் கொண்டனர்;

மற்றும் கடலூர் மாவட்ட ஆட்சியர் வெளியிட்ட, 18.05.2021 தேதியிட்ட ஒரு கடிதத்தில், மேற்கண்ட செட்டில்மென்ட் ஏற்பாட்டைக் குறிப்பிட்டு, இரண்டாம் பகுதி பார்ட்டிகளின் விவரங்களையும் அதில் குறிப்பிட்டு, இரண்டாம் பகுதி பார்ட்டிகளுக்கு ஆதரவாக செட்டில்மென்ட் தொகையை செலுத்துமாறு கோரியுள்ளார், ;

இப்போது, எனவே, இந்த ஒப்பந்தம் பின்வருவற்றை குறிப்பிடுகிறது:-

1. திரு. ராஜ்குமாரின் சட்டபூர்வ வாரிசுதாரர்கள் மற்றும் பிரதிநிதிகள் தாங்கள் தான் என்றும், இறந்தவரின் எதேனும் உயில் அல்லது ஏற்பாட்டின் கீழும் வேறு எந்தவொரு சட்டபூர்வ வாரிசு அல்லது பயனாளியும் இல்லை என்பதையும் இரண்டாவது பகுதியின் பார்ட்டிகள் குறிப்பிடுகின்றன.
2. இந்தப் பிரதிநிதித்துவத்தின் அடிப்படையில், முதல் பார்ட்டி இதன் மூலம், எவ்வித தீங்கும் பாரபட்சமுமின்றி, இரண்டாம் பகுதியின்



R.S.B. 101

R.S.B. 101

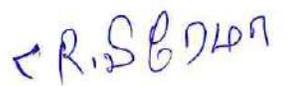
பார்ட்டிகளுக்கு ரூ.15,00,000/- (ரூபாய் பதினைந்து லட்சம் மட்டும்)
கீழ்க்கண்டபடி மொத்தமாக செலுத்துகின்றனர்:

| வரிசை எண் | பணம் பெறுபவரின் முழுப் பெயர் | அளிக்கப்பட்ட தொகை (எழுத்துக்களாலும் எண்களாலும்) | பணம் செலுத்திய முறை | வரைவோலை எண் / காசோலை எண் & தேதி |
|--------------|---------------------------------|--|---------------------------|---|
| 1. | திருமதி.பிரேமா | 12500 (பன்னிரண்டாயிரத்து ஐநூறு மட்டும்) | ரொக்கம் | பொருந்தாது |
| 2. | அமுதா | 12500 (பன்னிரண்டாயிரத்து ஐநூறு மட்டும்) | ரொக்கம் | பொருந்தாது |
| 3. | திருமதி.பிரேமா | 1,87,500/- (ஒரு லட்சத்து எண்பத்தி ஏழு ஆயிரத்து ஐநூறு) | டி.டி | ஐசிஐசிஐ வங்கி , கடலூர் 19.05.2021 தேதியிட்ட டி.டி எண்: 501174 |
| 4. | வாணி ஸ்ரீ | 5,50,000/- (ஐந்து லட்சத்து ஐம்பதாயிரம்) | டி.டி | ஐசிஐசிஐ வங்கி , கடலூர் 19.05.2021 தேதியிட்ட டி.டி எண்: 501179 |
| 5. | வேலன் | 5,50,000/- (ஐந்து லட்சத்து ஐம்பதாயிரம்) | டி.டி | ஐசிஐசிஐ வங்கி , கடலூர் 19.05.2021 தேதியிட்ட டி.டி எண்: 501178 |
| 6. | அமுதா | 1,87,500/- (ஒரு லட்சத்து எண்பத்தி ஏழு ஆயிரத்து ஐநூறு) | டி.டி | ஐசிஐசிஐ வங்கி , கடலூர் 19.05.2021 தேதியிட்ட டி.டி எண்: 501175 |

3. இரண்டாவது பகுதியின் பார்ட்டிகள் பணம் பெற்றுக்கொண்டதை
உறுதிப்படுத்துகின்றனர்.



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4. மேற்கண்ட தொகைகள் இரண்டாவது பகுதியின் அனைத்து பார்ட்டிகளின் கிளைம்களுக்கும் முழுமையான மற்றும் இறுதி செட்டில்மென்ட்டாக வழங்கப்படுகின்றன.
5. மேற்கண்ட தொகைகளைப் பெற்றவுடன், இரண்டாம் பகுதி பார்ட்டிகள் முதல் பார்ட்டிக்கு எதிராக எந்த வகையான கிளைம்களையும் கொண்டிருக்கவில்லை.
6. இரண்டாம் பகுதியின் பார்ட்டிகள் தங்கள் கிளைம்கள் அனைத்தும் இந்த ஒப்பந்தத்தின் மூலம் தீர்க்கப்பட்டன என்பதை ஒப்புக்கொள்கின்றன. அனைத்து பார்ட்டிகளும் உண்மையுடன் தங்கள் கடமைகளை கடைப்பிடிக்க வேண்டும் மற்றும் செயலாற்ற வேண்டும் என்று மேலும் ஒப்புக் கொள்ளப்படுகிறது.
7. மாநில வருவாய் அதிகாரிகளின் முன்னிலையில், மற்றும் அவர்களின் உதவியுடன், பார்ட்டிகள் எவ்வித வற்புறுத்தலும் இன்றி தாமாக முன்வந்து இந்த ஒப்பந்தத்திற்கு சம்மதித்துள்ளன.

கீழ்க்கண்ட சாட்சிகள் முன்னிலையில், பார்ட்டிகள் இந்த எழுத்துப்பூர்வ ஒப்பந்தத்தில் 20.05.2021 அன்று கையெழுத்திட்டனர்.



கிரிம்சன் ஆர்கானிக்ஸ்
பிரைவேட் லிமிடெட் சார்பாக

செந்துர்பாண்டியன்
ரமேஷ்பிரபகரன்
நிர்வாக இயக்குநர்
டி.ஐ.என்: 05339640

R. R. Raman
திருமதி.. பிரேமா
வயது: 35
முகவரி:
ஆதார் எண்.:

R. R. Raman

R. R. Raman

மகன் (வேலன்) சார்பாக
கையொப்பமிடப்பட்டது

R. சீரமன்

திருமதி. பிரேமா

வயது: 35

முகவரி:

ஆதார் எண்.:

மகள் (வாணி ஸ்ரீ) சார்பாக
கையொப்பமிடப்பட்டது

R. சீரமன்

திருமதி. பிரேமா

வயது: 35

முகவரி:

ஆதார் எண்.:

R. சீரமன்

அமுதா

வயது: 55

முகவரி:

ஆதார் எண்.:

கீழ்க்கண்ட சாட்சிகள் முன்னிலையில்:-

1. கையொப்பம்: Srinivasan
முழு பெயர்: R. Srinivasan.
வயது:
முகவரி:
ஆதார் எண் :

2. கையொப்பம்:
முழு பெயர்:
வயது:
முகவரி:
ஆதார் எண்:

(Kannan)
Sangoli Kuppan & PSC

<<TRUE TYPED COPY>>

Compensation settlement receipt

**Compensation agreement , May 20,2021 Tamil Nadu made between the following parties
(Compensation Receipt)**

**C-8,C-10 & C-11, Sipcot Industrial Estate, Kudikkadu, Cuddalore Tamil Nadu- 607 005,
Crimsun Organics Pvt Ltd the company's Managing Director (Hereafter referred to as First
Party or Company)** unless or otherwise stated in terms of its meaning or context or meaning
including their heirs , successors and appointees are first party.

And

Mr. Rajkumar's , wife Mrs. Prema aged 35, Mr. Rakkumar's minor daughter Vani shree age 6,
her guardian Mrs.Prema.

Mr.Rajkumar's minor son, Velan his guardian Mrs.Prema

Mr.Rajkumar's Mother Amutha age 55

Then collectively referred to as second party, unless or otherwise stated in terms of its
meaning or context or meaning including their heirs , successors and appointees are second
part.

In this case, on 13.05.2021, Mr Rajkumar's has worked as Assit Operator under JKS Contract
in Float No C9,C10&C11 Crimsun Organics Pvt Ltd, Sipcot industrial Estate , Kudickkadu,
Village Cuddalore , Tamil Nadu.

And in the case deceased employee died after an accident at the factory on 13.05.2021.
Contract worker who died on accident was eligible for ESIC ESIC No. 5130950435.

And in the second part, parties of legal heirs of deceased were themself mentioned.

Party's through their representatives, on 13.05.2021 Cuddalore Revenue Divisional office in
presence of Divisional officer , 1st party has agreed to pay to a sum of Rs.15,00,000/- (Fifteen
Lakhs Only) to 2nd party as full & final settlement, on the below mentioned terms and
conditions , the amount will be paid.

And in a letter dated 18.05.2021 issued by the cuddalore district collector mentioning the
above settlement arrangement and the details mentioned and requested to pay settlement
in favour of second party.

Therefore the agreement specifies the following.

1) Mr.Rajkumar's legal heirs and representatives are themself and there is no other legal
heir or beneficiary's for the deceased member which was produced by the second party.

2) On the basis of representation, the first part thereby without any harm or discrimination, Rs.15,00,000/- will pay the amount to the second party.

| Sl.No | Recipient Full Name | Amount | Amount Paid Through | DD No / cheque No |
|-------|---------------------|--|---------------------|--|
| 1 | Mrs.Prema | Rs.12500 (Rupees Twelve Thousand and Five Hundred Only) | Cash | NA |
| 2 | Amutha | Rs.12500 (Rupees Twelve Thousand and Five Hundred Only) | Cash | NA |
| 3 | Mrs. Prema | Rs.1,87,500/- (Rupees One Lakhs Eighty Seven Thousand and Five Hundred Only) | DD | ICICI Bank, Cuddalore dated 19.05.2021, DD No.501174 |
| 4 | Vani Shree | Rs.5,50,000/- (Rupees Five Lakhs Fifty Thousand Only) | DD | ICICI Bank, Cuddalore dated 19.05.2021, DD No.501179 |
| 5 | Velan | Rs.5,50,000/- (Rupees Five Lakhs Fifty Thousand Only) | DD | ICICI Bank, Cuddalore dated 19.05.2021, DD No.501178 |
| 6 | Amutha | Rs.1,87,500/- (Rupees One Lakhs Eighty Seven Thousand and Five Hundred Only) | DD | ICICI Bank, Cuddalore dated 19.05.2021, DD No.501175 |

3) The second party has confirmed the above payment

4) The above claim amount has been settle as full and final settlement.

5) Upon the receipt of the above claim, the 2nd party shall not claim against the first Party.

6) The 2nd party has agreed that all the claim have been settled by this agreement. It is further agreed that all parties must faithfully in discharge and perform their duties.

7) In presence of Revenue officer and with their assistance, the parties have voluntarily came agreed to this settlement without any coercion.

In presence of the following witness, the parties has signed this agreement on 20.05.2021

On behalf of Crimsun Organics

Senturapandian Ramesh

(Managing director)

Mrs.Prema

Age : 35

Address :

Aadhar No.

On behalf of son(Velan) Signed

Mr.Prema

Age :35

Address:

Aadhar No.

On behalf of daughter(Vani Shree) Signed

Mr.Prema

Age :35

Address:

Aadhar No.

Mrs.Amutha

(Managing director)

Age : 35

Address :

Aadhar No.

Below witness

Signature:

Full Name: R.Srinivasan

Age:

Address

Aadhar No.

Signature:

Full Name: N.Kumaran

Age:

Address: Sangolikuppam

Aadhar No.



தமிழ்நாடு தமில்நாடு TAMILNADU

20.5.2021

CD 286777

C.R./MSUN ORGANICS PVT. LTD

SIP 201, Cuddalore-5

S. R.
S. RADHAKRISHNAN
STAMP VENDOR
L. NO:14/97,
Manjakkuppam, Cuddalore-5
Tamilnada.

கருணைத் தொகை செட்டில்மெண்ட் ரசீது

இந்த கருணைத் தொகை ஒப்பந்தம், மே 20, 2021 ஆம் ஆண்டு, தமிழ்நாடு, கடலூரில் கீழ்க்கண்ட இரண்டு தரப்பினருக்கிடையே செய்யப்பட்டுள்ளது (கருணைத் தொகை ஒப்பந்த ரசீது)

சி - 9, சி-10 மற்றும் சி-11 சிப்காட் தொழில் வளாகம், குடிக்காடு, கடலூர் தமிழ்நாடு - 607005 இந்தியா, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் நிறுவனத்தின், நிர்வாக இயக்குனர் திரு. ரமேஷ் பிரபாகரன் மூலம், (இதன் பின்னர் "முதலாவது பார்ட்டி" அல்லது "நிறுவனம்" என்று குறிப்பிடப்படும், அதன் பொருள் அல்லது சூழல் அல்லது அர்த்தத்திற்கு வேறுவிதத்தில்

S. R.

சொல்லப்பட்டால் ஒழிய, அதன் பின்வருபவர்கள் மற்றும் நியமிப்பாளர்களை உள்ளடக்கும்) முதலாவது பகுதியாகவும்;

மற்றும்

திருமதி.சவிதாவின் கணவர் 40 வயதான திரு செந்தில்குமார்,;

திருமதி. சாவிதாவின் மைனர் மகனான 16 வயதான சந்தோஷ்குமார், அவரது பாதுகாவலர் திரு செந்தில்குமார் மூலம்;

திருமதி. சவிதாவின் மைனர் மகனான 13 வயதான ஜாஸ்மின், தனது பாதுகாவலர் திரு. செந்தில்குமார் மூலம்;

இதன் பின்னர் கூட்டாக "இரண்டாவது பார்ட்டிகள்" என்று குறிப்பிடப்படுவார்கள், அதன் பொருள் அல்லது சூழல் அல்லது அர்த்தத்திற்கு வேறுவிதத்தில் சொல்லப்பட்டால் ஒழிய, அவர்களின் வாரிசுகள், பின்வருபவர்கள் மற்றும் நியமிப்பாளர்களை உள்ளடக்கும்) ஆகியோர் இரண்டாவது பகுதியாகவும்

இந்நிலையில், 13.05.2021 அன்று, திருமதி. சவிதா, வயது ----, க/பெ. செந்தில்குமார் (இறந்து போனவர்), அவர்கள், ஜே.கே.எஸ் ஒப்பந்தத்தின் கீழ், பிளாட் நம்பர்: சி-9, 10, 11, சிப்காட் தொழில் வளாகம், குடிக்காடு கிராமம், கடலூர் டவுன், கடலூர் வட்டம், தமிழ்நாடு, கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் இல் அமைந்துள்ள நிறுவனத்தின் தொழிற்சாலையில் ஒரு (House Keeping) ஆக பணிபுரிந்து வந்தார்.

மற்றும் இந்நிலையில், இறந்து போன ஊழியர் 13.05.2021 அன்று தொழிற்சாலையில் நடந்த விபத்திற்குப் பின்னர் காலமானார்.




விபத்தில் இறந்த ஊழியர் ஈ.எஸ்.ஐ.சி-இன் கீழ் தகுதி பெறுகிறார்
(ஐபி எண் : 5129657599)

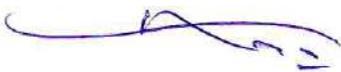
மற்றும், இரண்டாம் பகுதியின் பார்ட்டிகள், இறந்தவரின் வாரிசுகள்
மற்றும் பிரதிநிதிகள் தாங்களே என குறிப்பிடுகின்றனர்;

மற்றும், பார்ட்டிகள் தங்கள் பிரதிநிதிகள் மூலம், 13.05.2021 அன்று
கடலூர் வருவாய்க் கோட்ட அலுவலர் அலுவலகத்தில் வருவாய்
அதிகாரிகள் முன்னிலையில், முதல் பார்ட்டி ரூ.15,00,000/- (ரூபாய்
பதினைந்து லட்சம் மட்டும்) மொத்தத் தொகையை இரண்டாம் பகுதி
பார்ட்டிகளின் அனைத்து கிளைகளுக்கும் முழுமையாகவும் இறுதி
செட்டில்மென்ட்டாகவும், கீழே கொடுக்கப்பட்டுள்ள விதிமுறைகள்
மற்றும் நிபந்தனைகளின் அடிப்படையில் செலுத்துவார்கள் என்று
ஒப்புக் கொண்டனர்;

மற்றும் கடலூர் மாவட்ட ஆட்சியர் வெளியிட்ட, 18.05.2021 தேதியிட்ட
ஒரு கடிதத்தில், மேற்கண்ட செட்டில்மென்ட் ஏற்பாட்டைக்
குறிப்பிட்டு, இரண்டாம் பகுதி பார்ட்டிகளின் விவரங்களையும் அதில்
குறிப்பிட்டு, இரண்டாம் பகுதி பார்ட்டிகளுக்கு ஆதரவாக
செட்டில்மென்ட் தொகையை செலுத்துமாறு கோரியுள்ளார், ;

இப்போது, எனவே, இந்த ஒப்பந்தம் பின்வருவற்றை குறிப்பிடுகிறது:-

1. திருமதி. சவிதாவின் சட்டபூர்வ வாரிசுதாரர்கள் மற்றும் பிரதிநிதிகள்
தாங்கள் தான் என்றும், இறந்தவரின் எதேனும் உயில் அல்லது
ஏற்பாட்டின் கீழும் வேறு எந்தவொரு சட்டபூர்வ வாரிசு அல்லது
பயனாளியும் இல்லை என்பதையும் இரண்டாவது பகுதியின்
பார்ட்டிகள் குறிப்பிடுகின்றன.




2. இந்தப் பிரதிநிதித்துவத்தின் அடிப்படையில், முதல் பார்ட்டி இதன் மூலம், எவ்வித தீங்கும் பாரபட்சமுமின்றி, இரண்டாம் பகுதியின் பார்ட்டிகளுக்கு ரூ.15,00,000/- (ரூபாய் பதினைந்து லட்சம் மட்டும்) கீழ்க்கண்டபடி மொத்தமாக செலுத்துகின்றனர்:

| வரிசை எண் | பணம் பெறுபவரின் முழுப் பெயர் | அளிக்கப்பட்ட தொகை (எழுத்துக்களாலும் எண்களாலும்) | பணம் செலுத்திய முறை | வரைவோலை எண் / காசோலை எண் & தேதி |
|-----------|------------------------------|--|---------------------|---|
| 1. | திரு. செந்தில்குமார் | 25,000 (இருபத்தைந்தாயிரம் மட்டும்) | ரொக்கம் | பொருந்தாது |
| 2. | திரு. செந்தில்குமார் | 1,75,000/- (ஒரு லட்சத்து எழுபத்தியாயிரம்) | டி.டி | ஐசிஐசிஐ வங்கி , கடலூர் 19.05.2021 தேதியிட்ட டி.டி எண்: 501172 |
| 3. | சந்தோஷ குமார் | 6,50,000/- (ஆறு லட்சத்து ஐம்பதாயிரம் மட்டும்) | டி.டி | ஐசிஐசிஐ வங்கி , கடலூர் 19.05.2021 தேதியிட்ட டி.டி எண்: 501173 |
| 4. | ஜாஸ்மின் | 6,50,000/- (ஆறு லட்சத்து ஐம்பதாயிரம் மட்டும்) | டி.டி | ஐசிஐசிஐ வங்கி , கடலூர் 19.05.2021 தேதியிட்ட டி.டி எண்: 501169 |

3. இரண்டாவது பகுதியின் பார்ட்டிகள் பணம் பெற்றுக்கொண்டதை உறுதிப்படுத்துகின்றனர்.
4. மேற்கண்ட தொகைகள் இரண்டாவது பகுதியின் அனைத்து பார்ட்டிகளின் கிளைகளுக்கும் முழுமையான மற்றும் இறுதி செட்டில்மென்ட்டாக வழங்கப்படுகின்றன.




5. மேற்கண்ட தொகைகளைப் பெற்றவுடன், இரண்டாம் பகுதி பார்ட்டிகள் முதல் பார்ட்டிக்கு எதிராக எந்த வகையான கிளைம்களையும் கொண்டிருக்கவில்லை.
6. இரண்டாம் பகுதியின் பார்ட்டிகள் தங்கள் கிளைம்கள் அனைத்தும் இந்த ஒப்பந்தத்தின் மூலம் தீர்க்கப்பட்டன என்பதை ஒப்புக்கொள்கின்றன. அனைத்து பார்ட்டிகளும் உண்மையுடன் தங்கள் கடமைகளை கடைப்பிடிக்க வேண்டும் மற்றும் செயலாற்ற வேண்டும் என்று மேலும் ஒப்புக் கொள்ளப்படுகிறது.
7. மாநில வருவாய் அதிகாரிகளின் முன்னிலையில், மற்றும் அவர்களின் உதவியுடன், பார்ட்டிகள் எவ்வித வற்புறுத்தலும் இன்றி தாமத முன்வந்து இந்த ஒப்பந்தத்திற்கு சம்மதித்துள்ளன.

கீழ்க்கண்ட சாட்சிகள் முன்னிலையில், பார்ட்டிகள் இந்த எழுத்துப்பூர்வ ஒப்பந்தத்தில் 20.05.2021 அன்று கையெழுத்திட்டனர்

கிரிம்சன் ஆர்கானிக்ஸ்
பிரைவேட் லிமிடெட் சார்பாக



செந்துர்பாண்டியன்
ரமேஷ்பிரபகரன்
நிர்வாக இயக்குநர்
டி.ஐ.என்: 05339640


செந்தில்குமார்
வயது: 40
முகவரி:
ஆதார் எண்.:

மகன் (சந்தோஷ குமார்) சார்பாக
கையொப்பமிடப்பட்டது

செந்தில் குமார்

வயது: 40

முகவரி:

ஆதார் எண்.:

மகள் (ஜாஸ்மின்) சார்பாக
கையொப்பமிடப்பட்டது

செந்தில் குமார்

வயது: 40

முகவரி:

ஆதார் எண்.:

கீழ்க்கண்ட சாட்சிகள் முன்னிலையில்:-

1. கையொப்பம்: *Sivakan*
முழு பெயர்: *R. Subhawan*
வயது:
முகவரி:

ஆதார் எண் :

2. கையொப்பம்: *Ku*
முழு பெயர்: *(Kumar N)*
வயது: *57*
முகவரி: *Sengalibuppur & Post*
ஆதார் எண் : *Cuddalore*

16

<<TRUE TYPED COPY>>

Compensation settlement receipt

Compensation agreement , May 20,2021 Tamil Nadu made between the following parties (Compensation Receipt)

C-8,C-10 & C-11, Sipcot Industrial Estate, Kudikkadu, Cuddalore Tamil Nadu- 607 005, Crimsun Organics Pvt Ltd the company's Managing Director (Hereafter referred to as First Party or Company) unless or otherwise stated in terms of its meaning or context or meaning including their heirs , successors and appointees are first party.

And

Mrs.Savitha's husband Mr.Senthil Kumar aged 40yrs

Mrs.Savitha's minor son Santhosh kumar aged 16 his guardian Mr.Senthil Kumar

Mrs.Savitha's minor daughter Jasmine aged her guardian Mr.Senthil Kumar

Then collectively referred to as second party, unless or otherwise stated in terms of its meaning or context or meaning including their heirs , successors and appointees are second part.

In this case, on 13.05.2021, Vijayaraj's has worked as House Keeping under JKS Contract in Float No C9,C10&C11 Crimsun Organics Pvt Ltd, Sipcot industrial Estate , Kudickkadu, Village Cuddalore , Tamil Nadu.

And in the case deceased employee died after an accident at the factory on 13.05.2021. Contract worker who died on accident was eligible for ESIC No. 5129657599.

And in the second part, parties of legal heirs of deceased were themselves mentioned.

Party's through their representatives, on 13.05.2021 Cuddalore Revenue Divisional office in presence of Divisional officer , 1st party has agreed to pay to a sum of Rs.15,00,000/- (Fifteen Lakhs Only) to 2nd party as full & final settlement, on the below mentioned terms and conditions , the amount will be paid.

And in a letter dated 18.05.2021 issued by the cuddalore district collector mentioning the above settlement arrangement and the details mentioned and requested to pay settlement in favour of second party.

Therefore the agreement specifies the following.

1) Mrs. Savitha's legal heirs and representatives are themselves and there is no other legal heir or beneficiary's for the deceased member which was produced by the second party.

2) On the basis of representation, the first part thereby without any harm or discrimination, Rs.15,00,000/- will pay the amount to the second party.

| Sl.No | Receipient Full Name | Amount | Amount Paid Through | DD No / cheque No |
|-------|----------------------|---|---------------------|--|
| 1 | Mr.Senthil Kumar | Rs.25000 (Rupees Twenty Five Thousand Only) | Cash | NA |
| 2 | Mr.Senthil Kumar | Rs.175000 (Rupees One Lakhs Seventy Five Thousand Only) | DD | ICICI Bank, Cuddalore dated 19.05.2021, DD No.501172 |
| 3 | Santhosh Kumar | Rs.6,50,000/- (Rupees Six Lakhs Fifty Thousand Only) | DD | ICICI Bank, Cuddalore dated 19.05.2021, DD No.501173 |
| 4 | Jasmine | Rs.6,50,000/- (Rupees Six Lakhs Fifty Thousand Only) | DD | ICICI Bank, Cuddalore dated 19.05.2021, DD No.501169 |

3) The second party has confirmed the above payment

4) The above claim amount has been settle as full and final settlement.

5) Upon the receipt of the above claim, the 2nd party shall not claim against the first Party.

6) The 2nd party has agreed that all the claim have been settled by this agreement. It is further agreed that all parties must faithfully in discharge and perform their duties.

7) In presence of Revenue officer and with their assistance, the parties have voluntarily came agreed to this settlement without any coercion.

In presence of the following witness, the parties has signed this agreement on 20.05.2021

On behalf of Crimsun Organics

Senturapandian Ramesh
(Managing director)

Mr.Senthil Kumar
Age : 40
Address :

Aadhar No.

Son (Santhosh Kumar on behalf him signed)

Age: 40

Aadhar No.

Daughter (Santhosh Kumar on behalf him signed)

Age: 40

Aadhar No.

Below witness

Signature:

Full Name: R.Srinivasan

Age:

Address

Aadhar No.

Signature:

Full Name: N.Kumaran

Age: 54

Address: Sangolikuppam

Aadhar No.



தமிழ்நாடு தமில்நாடு TAMILNADU

20.5.2021

CD 286778

CAJIM SON ORGANIZER PVT. LTD

SIPCOT, COOBE, AND S

S. R.

S. RADHAKRISHNAN
STAMP VENDOR

L NO:14/97,

Van jakuppan, Cuddalore-1
Tamilnada.

கருணைத் தொகை செட்டில்மெண்ட் ரசீது

இந்த கருணைத் தொகை ஒப்பந்தம், மே 20, 2021 ஆம் ஆண்டு, தமிழ்நாடு, கடலூரில் கீழ்க்கண்ட இரண்டு தரப்பினருக்கிடையே செய்யப்பட்டுள்ளது (கருணைத் தொகை ஒப்பந்த ரசீது)

சி - 9, சி-10 மற்றும் சி-11 சிப்காட் தொழில் வளாகம், குடிக்காடு, கடலூர் தமிழ்நாடு - 607005 இந்தியா, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் நிறுவனத்தின், நிர்வாக இயக்குனர் திரு. ரமேஷ் பிரபாகரன் மூலம், (இதன் பின்னர் "முதலாவது பார்ட்டி" அல்லது "நிறுவனம்" என்று குறிப்பிடப்படும், அதன் பொருள் அல்லது சூழல் அல்லது அர்த்தத்திற்கு வேறுவிதத்தில்

1

V. S. R. V. S. R.

V. S. R. V. S. R.

சொல்லப்பட்டால் ஒழிய, அதன் பின்வருபவர்கள் மற்றும் நியமிப்பாளர்களை உள்ளடக்கும்) முதலாவது பகுதியாகவும்;

மற்றும்

திரு விஜேஷ்ராஜின் தந்தை, 58 வயதான திரு.விஜயகுமார்,;

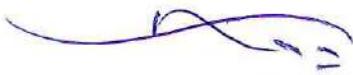
திரு விஜேஷ்ராஜின் தாயார் 51 வயதான சுலோச்சனா,;

இதன் பின்னர் கூட்டாக "இரண்டாவது பார்ட்டிகள்" என்று குறிப்பிடப்படுவார்கள், அதன் பொருள் அல்லது சூழல் அல்லது அர்த்தத்திற்கு வேறுவிதத்தில் சொல்லப்பட்டால் ஒழிய, அவர்களின் வாரிசுகள், பின்வருபவர்கள் மற்றும் நியமிப்பாளர்களை உள்ளடக்கும்) ஆகியோர் இரண்டாவது பகுதியாகவும்

இந்நிலையில், 13.05.2021 அன்று, திரு. விஜேஷ்ராஜ், வயது 25, த/பெ. விஜயகுமார் (இறந்து போனவர்), அவர்கள், பிளாட் நம்பர்: சி-9, 10, 11, சிப்காட் தொழில் வளாகம், குடிக்காடு கிராமம், கடலூர் டவுன், கடலூர் வட்டம், தமிழ்நாடு கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் இல் அமைந்துள்ள நிறுவனத்தின் தொழிற்சாலையில் ஒரு வேதியல் உதவியாளராக ஆக பணிபுரிந்து வந்தார்.

மற்றும் இந்நிலையில், இறந்து போன ஊழியர் 13.05.2021 அன்று தொழிற்சாலையில் நடந்த விபத்திற்குப் பின்னர் காலமானார். விபத்தில் இறந்த ஊழியர் ஈ.எஸ்.ஐ.சி-இன் கீழ் தகுதி பெறுகிறார் (ஐபி எண் : 5130092405)

மற்றும், இரண்டாம் பகுதியின் பார்ட்டிகள், இறந்தவரின் வாரிசுகள் மற்றும் பிரதிநிதிகள் தாங்களே என குறிப்பிடுகின்றனர்;



2

← V'203W010h3

← V.சுலோச்சனா

மற்றும், பார்ட்டிகள் தங்கள் பிரதிநிதிகள் மூலம், 13.05.2021 அன்று கடலூர் வருவாய்க் கோட்ட அலுவலர் அலுவலகத்தில் வருவாய் அதிகாரிகள் முன்னிலையில், முதல் பார்ட்டி ரூ.15,00,000/- (ரூபாய் பதினைந்து லட்சம் மட்டும்) மொத்தத் தொகையை இரண்டாம் பகுதி பார்ட்டிகளின் அனைத்து கிளைகளுக்கும் முழுமையாகவும் இறுதி செட்டில்மென்ட்டாகவும், கீழே கொடுக்கப்பட்டுள்ள விதிமுறைகள் மற்றும் நிபந்தனைகளின் அடிப்படையில் செலுத்துவார்கள் என்று ஒப்புக் கொண்டனர்;

மற்றும் கடலூர் மாவட்ட ஆட்சியர் வெளியிட்ட, 18.05.2021 தேதியிட்ட ஒரு கடிதத்தில், மேற்கண்ட செட்டில்மென்ட் ஏற்பாட்டைக் குறிப்பிட்டு, இரண்டாம் பகுதி பார்ட்டிகளின் விவரங்களையும் அதில் குறிப்பிட்டு, இரண்டாம் பகுதி பார்ட்டிகளுக்கு ஆதரவாக செட்டில்மென்ட் தொகையை செலுத்துமாறு கோரியுள்ளார், ;

இப்போது, எனவே, இந்த ஒப்பந்தம் பின்வருவற்றை குறிப்பிடுகிறது:-

1. திரு. விஜேஷ்ராஜின் சட்டபூர்வ வாரிசுதாரர்கள் மற்றும் பிரதிநிதிகள் தாங்கள் தான் என்றும், இறந்தவரின் எதேனும் உயில் அல்லது ஏற்பாட்டின் கீழும் வேறு எந்தவொரு சட்டபூர்வ வாரிசு அல்லது பயனாளியும் இல்லை என்பதையும் இரண்டாவது பகுதியின் பார்ட்டிகள் குறிப்பிடுகின்றன.
2. இந்தப் பிரதிநிதித்துவத்தின் அடிப்படையில், முதல் பார்ட்டி இதன் மூலம், எவ்வித தீங்கும் பாரபட்சமுமின்றி, இரண்டாம் பகுதியின் பார்ட்டிகளுக்கு ரூ.15,00,000/- (ரூபாய் பதினைந்து லட்சம் மட்டும்) கீழ்க்கண்டபடி மொத்தமாக செலுத்துகின்றனர்:



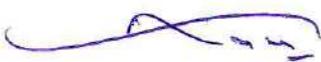
3

1 P 273 W 61044

கேள்விகள்

| வரிசை எண் | பணம் பெறுபவரின் முழுப் பெயர் | அளிக்கப்பட்ட தொகை (எழுத்துக்களாலும் எண்களாலும்) | பணம் செலுத்திய முறை | வரைவோலை எண் / காசோலை எண் & தேதி |
|--------------|---------------------------------|--|---------------------------|---|
| 1. | திரு. விஜயகுமார் | 12,500 (பன்னிரண்டாயிரத்து ஐநூறு மட்டும்) | ரொக்கம் | பொருந்தாது |
| 2. | திருமதி. சுலோச்சனா | 12,500 (பன்னிரண்டாயிரத்து ஐநூறு மட்டும்) | ரொக்கம் | பொருந்தாது |
| 3. | திரு. விஜயகுமார் | 7,37,500/- (ஏழுலட்சத்து முப்பத்தியேழாயிரத்து ஐநூறு மட்டும்) | டி.டி | ஐசிஐசிஐ வங்கி , கடலூர் 19.05.2021 தேதியிட்ட டி.டி எண்: 501176 |
| 4. | திருமதி. சுலோச்சனா | 7,37,500/- (ஏழுலட்சத்து முப்பத்தியேழாயிரத்து ஐநூறு மட்டும்) | டி.டி | ஐசிஐசிஐ வங்கி , கடலூர் 19.05.2021 தேதியிட்ட டி.டி எண்: 501177 |

- இரண்டாவது பகுதியின் பார்ட்டிகள் பணம் பெற்றுக்கொண்டதை உறுதிப்படுத்துகின்றனர்.
- மேற்கண்ட தொகைகள் இரண்டாவது பகுதியின் அனைத்து பார்ட்டிகளின் கிளைம்களுக்கும் முழுமையான மற்றும் இறுதி செட்டில்மென்ட்டாக வழங்கப்படுகின்றன.
- மேற்கண்ட தொகைகளைப் பெற்றவுடன், இரண்டாம் பகுதி பார்ட்டிகள் முதல் பார்ட்டிக்கு எதிராக எந்த வகையான கிளைம்களையும் கொண்டிருக்கவில்லை.
- இரண்டாம் பகுதியின் பார்ட்டிகள் தங்கள் கிளைம்கள் அனைத்தும் இந்த ஒப்பந்தத்தின் மூலம் தீர்க்கப்பட்டன என்பதை



சுலோச்சனா

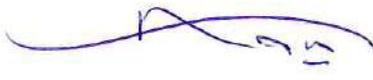
சுலோச்சனா

ஒப்புக்கொள்கின்றன. அனைத்து பார்ட்டிகளும் உண்மையுடன் தங்கள் கடமைகளை கடைப்பிடிக்க வேண்டும் மற்றும் செயலாற்ற வேண்டும் என்று மேலும் ஒப்புக் கொள்ளப்படுகிறது.

7. மாநில வருவாய் அதிகாரிகளின் முன்னிலையில், மற்றும் அவர்களின் உதவியுடன், பார்ட்டிகள் எவ்வித வற்புறுத்தலும் இன்றி தாமாக முன்வந்து இந்த ஒப்பந்தத்திற்கு சம்மதித்துள்ளன.

கீழ்க்கண்ட சாட்சிகள் முன்னிலையில், பார்ட்டிகள் இந்த எழுத்துப்பூர்வ ஒப்பந்தத்தில் 20.05.2021 அன்று கையெழுத்திட்டனர்

கிரிம்சன் ஆர்கானிக்ஸ்
பிரைவேட் லிமிடெட் சார்பாக



செந்துர்பாண்டியன்
ரமேஷ்பிரபகரன்
நிர்வாக இயக்குநர்
டி.ஐ.என்: 05339640



V.ஜெயகுமார்

(விஜயகுமார்)
வயது: 58
முகவரி:

ஆதார் எண்.:

V.சுலோசனா

(சுலோசனா)
வயது: 51
முகவரி:

ஆதார் எண்.

கீழ்க்கண்ட சாட்சிகள் முன்னிலையில்:-

1. கையொப்பம்: *Srinivasan*
 முழு பெயர் : *R. Srinivasan*
 வயது:
 முகவரி:

ஆதார் எண் ::

2. கையொப்பம்: *(un)*
 முழு பெயர்: *(Kumar.N)*
 வயது: *54*
 முகவரி: *Sangolikkuppam & Post*
 ஆதார் எண் :: *Cuddalore -*

<<TRUE TYPED COPY>>

Compensation settlement receipt

Compensation agreement , May 20,2021 Tamil Nadu made between the following parties (Compensation Receipt)

C-8,C-10 & C-11, Sipcot Industrial Estate, Kudikkadu, Cuddalore Tamil Nadu- 607 005, Crimsun Organics Pvt Ltd the company's Managing Director (Hereafter referred to as First Party or Company) unless or otherwise stated in terms of its meaning or context or meaning including their heirs , successors and appointees are first party.

And

Mr.Vijesh Raj father, Mr.Vijayakumar aged 58

Mr. Vijesh Raj's Mother Mrs.Solachana aged 51

Then collectively referred to as second party, unless or otherwise stated in terms of its meaning or context or meaning including their heirs , successors and appointees are second part.

In this case, on 13.05.2021, Vijesh Raj's has worked as Trainee chemist in C9,C10&C11 Crimsun Organics Pvt Ltd, Sipcot industrial Estate , Kudickkadu, Village Cuddalore , Tamil Nadu.

And in the case deceased employee died after an accident at the factory on 13.05.2021. who died on accident was eligible for ESIC ESIC No. 5130092405.

And in the second part, parties of legal heirs of deceased were themself mentioned.

Party's through their representatives, on 13.05.2021 Cuddalore Revenue Divisional office in presence of Divisional officer , 1st party has agreed to pay to a sum of Rs.15,00,000/- (Fifteen Lakhs Only) to 2nd party as full & final settlement, on the below mentioned terms and conditions , the amount will be paid.

And in a letter dated 18.05.2021 issued by the cuddalore district collector mentioning the above settlement arrangement and the details mentioned and requested to pay settlement in favour of second party.

Therefore the agreement specifies the following.

1) Mr. Vijesh Raj's legal heirs and representatives are themself and there is no other legal heir or beneficiary's for the deceased member which was produced by the second party.

2) On the basis of representation, the first part thereby without any harm or discrimination, Rs.15,00,000/- will pay the amount to the second party.

| Sl.No | Recipient Full Name | Amount | Amount Paid Through | DD No / cheque No |
|-------|---------------------|--|---------------------|--|
| 1 | Mr.Vijaya kumar | Rs.12500 (Rupees Twelve Thousand and Five Hundred Only) | Cash | NA |
| 2 | Mrs.Sulochana | Rs.12500 (Rupees Twelve Thousand and Five Hundred Only) | Cash | NA |
| 3 | Mr.Vijaya kumar | Rs.7,37,500/- (Rupees Seven Lakhs Thirty Seven Thousand and Five Hundred Only) | DD | ICICI Bank, Cuddalore dated 19.05.2021, DD No.501176 |
| 4 | Mrs.Sulochana | Rs.7,37,500/- (Rupees Seven Lakhs Thirty Seven Thousand and Five Hundred Only) | DD | ICICI Bank, Cuddalore dated 19.05.2021, DD No.501177 |

3) The second party has confirmed the above payment

4) The above claim amount has been settle as full and final settlement.

5) upon the receipt of the above claim, the 2nd party shall not claim against the first Party.

6) the 2nd party has agreed that all the claim have been settled by this agreement. It is further agreed that all parties must faithfully in discharge and perform their duties.

7) In presence of Revenue officer and with their assistance, the parties have voluntarily came agreed to this settlement without any coercion.

In presence of the following witness, the parties has signed this agreement on 20.05.2021

On behalf of Crimsun Organics

Senturapandian Ramesh
(Managing director)

Mr. Vijaya Kumar
Age : 58
Address :

Aadhar No.

Mrs.Sulachana

Age:51

Address

Aadhar No.

Below witness

Signature:

Full Name: R.Srinivasan

Age:

Address

Aadhar No.

Signature:

Full Name: N.Kumaran

Age: 54

Address: Sangolikuppam

Aadhar No.

பதிவஞ்சல் / ஒப்புதல் அட்டையுடன்

தொழிலக பாதுகாப்பு மற்றும் சுகாதார இணை இயக்குநர் அலுவலகம், கடலூர்
தடையாணை

எண். இ/906/2021

நாள்.14.05.2021

தொழிற்சாலைகள் சட்டம் 1948 (திருத்தப்பட்ட சட்டம் 1987) மற்றும் தமிழ்நாடு
தொழிற்சாலைகள் விதிகள் 1950

1. தங்கள் தொழிற்சாலையில் 13.05.2021 அன்று பிற்பகல் 01.45 மணியளவில் கடலூர் தொழிலக பாதுகாப்பு மற்றும் சுகாதார இணை இயக்குநர் (மு.சு.பொ) மற்றும் கடலூர் தொழிலக பாதுகாப்பு மற்றும் சுகாதார துணை இயக்குநர் (மு.சு.பொ) அவர்களுடன் கூட்டாய்வு செய்தபோது இணைப்பில் சுட்டிக்காட்டியவாறு தொழிற்சாலைகள் சட்டம் மற்றும் விதிகளின் கீழான சட்ட மீறதல்கள் இருப்பது கண்டறியப்பட்டது. அதற்காக நற்போது தொழிற்சாலையில் நடத்த தீ விபத்தின் காரணமாக முழுமை பெறாமல் பாதியில் நிறுத்தப்பட்டிருந்தால் Fipronil Technical மற்றும் Acetamiprid Process Incomplete ஆக பாதியில் நிறுத்தப்பட்டுள்ளதால் விபத்து ஏதும் ஏற்படாவண்ணம் Process time ஆறு நாட்களுக்குள் முடித்து பாதுகாப்பாக Plant-ஐ Shut down செய்த பிறகு தொழிற்சாலையில் Reactor Vessel 108 உட்பட தொழிற்சாலை முழுவதும் பயன்பாட்டிற்கு தடையாணை பிறப்பிக்கப்படுகிறது.
2. இவ்வாணை சார்பு செய்யப்பட்ட 30 நாட்களுக்குள் இயக்குநர், தொழிலக பாதுகாப்பு மற்றும் சுகாதார இயக்ககம், சென்னை அவர்களிடம் இவ்வாணைக்கு எதிராக மேல்முறையீடு செய்யலாம் என்பதை அறியவும், மேற்படி எந்த ஒரு மேல் முறையீடும் ரூ.5.00 மதிப்புள்ள நீதிமன்றக் கட்டணவில்லை மற்றும் இவ்வாணை வழங்கியவரால் சரிபார்க்கப்பட்டது என்று சான்றளிக்கப்பட்ட எதிர்மேல் முறையீடும் ஆணையின் (Order appealed against) உண்மை நகலை கொண்டிருக்க வேண்டும். மேலும் நீதிமன்ற கட்டண சட்டத்தின் கீழ் ஒவ்வொரு முன்னூற்று அறுபது சொற்களுக்கு அல்லது அதனை அடுத்த பின்னத்திற்கு ஐம்பது காசுகள் வீதம் ஆணையின் நகலில் கட்டணவில்லை ஒட்டப்பட வேண்டும்.

3. சட்டம் மற்றும் விதிகளின் கீழான ஏற்பாடுகளை செயற்படுத்தாமலுக்கு முன்னறிவிப்பின்றி (Without Prejudice) இவ்வலுவலகம் எந்த ஒரு நடவடிக்கையும் மேற்கொள்ளலாம் என்று இவ்வாணை அளிக்கப்படுகிறது.

இணை இயக்குநர்,
தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம்,
கடலூர்(பொ)

ஆய்வு செய்த அலுவலர்:

1. திரு.செ.சித்தார்த்தன்,எம்.இ.,எம்.பி.ஏ.,டி.ஐ.எச்.,
இணை இயக்குநர்,
தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம்,
கடலூர். (மு.கூ.பொ)
2. திருமதி.இ. இலக்கியா, பீ.டெக்.,
தணை இயக்குநர்,
தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம்,
கடலூர். (மு.கூ.பொ)

பெறுநர்:

MR.RAMESH PRABAKARAN , (Age-53)
S/o.Mr.SENTHUR PANDIYAN,
OCCUPIER / உரிமையாளர்,
Crimson Organics Pvt Limited, Plot
C9,10,11,Sipcot Industrial complex,
Kudikadu Village, Cuddalore
Town,Cuddalore Taluk,
Cuddalore District.

நகல் பணிநிறுப்பப்படுகிறது:

1. இயக்குநர், தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம், சென்னை.
2. கூடுதல் இயக்குநர், தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம், திருச்சிராப்பள்ளி.

தொழிலக பாதுகாப்பு மற்றும் சுகாதார இணை இயக்குநர் அலுவலகம்,
கடலூர்

தொழிற்சாலைகள் சட்டம் 1948 தமிழ்நாடு தொழிற்சாலைகள் விதிகள் 1950
மற்றும் திருத்தப்பட்ட சட்டம் 1987

1.பிரிவு 40(2):

தொழிற்சாலையின் எந்தவொரு கட்டிடமோ (அ) கட்டிட பகுதிகளோ (அ) வழித்தடம், இயந்திரங்கள் (அ) உற்பத்தி வளாகத்தின் எந்த ஒரு பகுதி மனித உயிருக்கோ (அ) பாதுகாப்பிற்கோ அச்சுறுத்தல் ஏற்படும் வகையில் அமைந்திருக்கக்கூடாது.

ஆனால், அதற்கு மாறாக Crimson Organics Private Limited, Plot C9,10,11,Sipcot Industrial complex, Kudikadu Village Cuddalore Town,Cuddalore Taluk, Cuddalore District. என்ற இத்தொழிற்சாலையில் Fipronil Technical மற்றும் Acetamiprid Technical ஆகிய பூச்சிகொல்லி மருந்துகள் மொத்தமாக (Bulk) தயாரிக்கப்பட்டு வருகிறது. 13.05.2021 அன்று காலை 07.40 மணியளவில் இத்தொழிற்சாலையில் நிறுவப்பட்டுள்ள Reactor Vessel 108 உள்ளே Isoprophyl Alcohol Recovery செய்த பின்னர், Reactor Vessel-ல் ஏற்பட்ட திடீர் அதிக அழுத்தம் காரணமாக Reactor Vessel-ல் உள்ளே இருந்த Acetamiprid impurities இரண்டாவது தளத்தில் உள்ள manhole-ஐ திறந்து கொண்டு அதிக வெப்பம் மற்றும் அதிக அழுத்தத்துடன் வெளியேறியதன் காரணமாக Acetamiprid impurities வெளியேறி தீப்பிடித்து எரியும்பொழுது 2-Cholorophrine gas-ம், smoke-ம் வெளியேறியதன் காரணமாக அதனை சுவாசித்ததினால் முதல், இரண்டாம், மூன்றாம் தளத்தில் பணிபுரிந்து கொண்டிருந்த தொழிலாளர்களுக்கு முச்சுதிணறல் ஏற்பட்டு 16 தொழிலாளர்கள் கடலூர், அரசு மருத்துவமனையில் சேர்க்கப்பட்டு அதில் 4 தொழிலாளர்கள் மரணமடைந்துள்ளனர் மற்றும் 9 தொழிலாளர்களும் கடலூர், அரசு மருத்துவமனையிலும், ஒரு தொழிலாளி பான்டிச்சேரி மகாத்மா காந்தி மருத்துவமனையிலும் சிகிச்சை பெற்று வருகின்றனர் என்பது 13.05.2021 அன்றைய புலனாய்வின் போது கண்டறியப்பட்டது.

இவ்விபத்து கீழ்க்காணும் பாதுகாப்பு குறைபாடுகளுடன் Reactor Vessel 108 பயன்படுத்தப்பட்டதன் காரணமாக விபத்து ஏற்பட்டுள்ளது.

| | |
|----|--|
| 1. | Steam line-ல் பாதுகாப்புக்கு இரண்டு Valveகள் உடன் நடுவில் ஒரு Bleeder Valve அமைக்கப்பட்டு, Steam line-ல் Leak இருப்பின் Bleeder Valve வழியே வெளியேறும் படியான அமைப்பு ஏற்படுத்தப்பட்டிருக்கவில்லை. |
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| 2 | Reactor Vessel –ல் எதிர்பாரா விதமாக வெப்பம், அழுத்தம் போன்ற காரணிகள் அதிகரிக்கும் போது அழுத்தத்தை வெளியேற்ற Safety Valve, அமைக்கப்பட்டு அதில் இருந்து வெளியேறும் வாயுக்கள் பரவி தொழிலாளர்களுக்கு ஆபத்து ஏற்படா வண்ணம் Scrubber system-த்துடன் இணைக்கப்பட்டிருக்கவில்லை. |
| 3 | இரண்டாவது தளத்திலிருந்து தொழிலாளர்கள் உடனடியாக வெளியேறுவதற்கு அமைக்கப்பட்டிருந்த இரண்டு படிக்ட்டு அமைப்புகளில் ஒரு அமைப்பு தற்காலிக பணிக்காக அடைக்கப்பட்டிருந்ததன் காரணமாக தொழிலாளர்கள் எளிதில் வெளியேற முடியாத நிலை ஏற்பட்டிருந்தது. மேலும் தொழிலாளர்கள் குறிப்பிட்ட அதிக அழுத்தத்தின் காரணமாக வாயுக்கள் வெளியேறிய போது கிழே இறங்குவதற்கு பதிலாக படிக்ட்டுகள் அடைக்கப்பட்டிருந்ததால் மூன்றாவது தளத்திற்கு சென்றதால் மேலே எழும்பிய வாயுக்களை தவிர்த்ததன் காரணமாக தொழிலாளர்களுக்கு மூச்சு திணறல் ஏற்பட்டுள்ளது. |
| 4 | Occupation Health centre – முழுநேர மருத்துவருடன் Factory Medical Officer உரிய கல்வி தகுதியுடன் முழு நேர மருத்துவ உதவியாளர் (உரிய கல்வி தகுதியுடன்) பணியமர்த்தி அதன் விவரங்களை சென்னை தொழிலக பாதுகாப்பு மற்றும் சுகாதார இயக்குநர் அவர்களிடம் ஒப்புதல் பெறப்படவில்லை. |

மேற்படி பாதுகாப்பற்ற சூழ்நிலைகளை முற்றிலும் அகற்றி Reactor Vessel 108 ஐ முழுமையாக சரிசெய்து உற்பத்தியாளரால் நிர்ணயக்கப்பட்ட அழுத்தத்தில் Hydro test செய்தும், Agitator ஐ சரிசெய்தும், Primary, Secondary Comdensor கள், Vapour line, Pipe line கள் மற்றும் இதர பாதுகாப்பு சாதனங்களின் பாதுகாப்பு செயல்பாடுகளை சரிசெய்து, உறுதி செய்து, சென்னை தொழிலக பாதுகாப்பு மற்றும் சுகாதார இயக்குநர் அவர்களால் அங்கீகரிக்கப்பட்ட தகுதி வாய்ந்த நபரிடமிருந்து Examination of Instruments and Safety system மற்றும் testing, examination and repair of plants and equipments தகுதி சான்று பெற்று பாதுகாப்பாக உற்பத்திப்பணி தொழிற்சாலையில் நடைமுறைப்படுத்தப்பட்ட விவரம் தொழிலக பாதுகாப்பு மற்றும் சுகாதார இயக்குநர் அவர்களுக்கு உரிய வழியில் சமர்ப்பித்து அவர்களின் அனுமதி பெறப்படும் வரை தொழிற்சாலையின் பயன்பாட்டிற்கு தடையாணை Fipronil Technical மற்றும் Acetamidrid Technical Batch process முடிந்த நாளில் இருந்து பிறப்பிக்கப்படுகிறது. இந்த தடையாணை உடனடியாக அமுலுக்கு வருகிறது எனவும் தெரிவிக்கப்படுகிறது.

எனவே, இவ்வாணை கிடைக்கப்பெற்ற தேதியிலிருந்து 30 நாட்களுக்குள் மேலே குறிப்பிட்டுள்ள பாதுகாப்புக் குழுவில்கள் சரி செய்யப்பட்டு, போதுமான பாதுகாப்பு ஏற்பாடுகள் நடைமுறைப்படுத்தப்பட்ட விவரம் புகைப்பட மற்றும் ஆவண ஆதாரங்களுடன் இயக்குநர், தொழிலக பாதுகாப்பு மற்றும் சுகாதார இயக்ககம், சென்னை மற்றும் இணை இயக்குநர், தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம், கடலூர் அவர்களுக்கு தெரிவிக்கப்பட வேண்டும். அவ்வாறு 30 நாட்களுக்குள் சரி செய்யப்படவில்லை எனில் எந்த ஒரு முன்னறிவிப்பும் இன்றி தொழிற்சாலைகள் சட்டப்படி உரிய மேல் நடவடிக்கை எடுக்க ஏதுவாகும் எனவும் இதன் மூலம் தெரிவிக்கப்படுகிறது.

14/05/2021

இணை இயக்குநர்,
தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம்,
கடலூர்.(பொ)

<<TRUE TYPED COPY>>

WITH REGISTRATION / APPROVAL CARD

OFFICE OF THE JOINT DIRECTOR OF OCCUPATIONAL SAFETY AND HEALTH,
CUDDALORE

PROHIBITION ORDER

No. E/906/2021

Date: 14.05.2021

Factories Act 1948 (Amended Act 1987) and Tamil Nadu Factories Rules 1950

1. During a joint inspection on 01.05.2021 at 01.45 pm with the Director of Cuddalore Occupational Safety (Full Additional In-charge) and Deputy Director of Cuddalore Occupational Safety (Full Additional In-charge) at your factory that afternoon, the factories were found to be in violation of the law and regulations as indicated in the attachment. Due to the fact that the factory is currently in a state of disrepair due to a fire accident, **Fipronil Technical and Acetamiprid Process Incomplete** are currently suspended. Hence after the shutdown of the **plant**, a restraining order has been issued for the use of the entire factory including **Reactor Vessel 108** and safely closed within 6 days to prevent any accident.
2. Notice that the Director, Occupational Safety and Health Directorate, Chennai can appeal against the order within 30 days of the affidavit. None of the above appeals have a court fee of Rs.5 and a fee of Rs.50 for every 360 words of the court fee rule or for the next fraction, must contain a true copy of the counter-appeal order (**order appealed against**) certified to have been verified by the issuer of this order.

3. This Order provides that the Office may take any action without prior notice (**Without prejudice**) for non-implementation of provisions under the Act and Sections.

Joint Director,
Occupational Safety and Health,
Cuddalore(Incharge)

Officer of Inspection:

1. Mr.R.Siddharthan,M.E.,M.B.A.,D.I.H.,
Joint Director,
Occupational Safety and Health,
Cuddalore(Full Additional In-charge)
2. Mrs.E. Ilakkiya, B.Tech.,
Deputy Director,
Occupational Safety and Health,
Cuddalore(Full Additional In-charge)

To:

MR. RAMESH PRABHAKARAN, (Age-53)
S/o.Mr.SENTHUR PANDIYAN,
OCCUPIER/Owner,
Crimson Organics Pvt Limited,Plot
C9,10,11,Sipcot Industrial Complex,
Kudikadu Village, Cuddalore
Town,Cudalore Taluk,
Cuddalore District.

The copy is sent submissively:

1. Director, Occupational Safety and Health, Chennai.
2. Additional Director, Occupational Safety and Health, Tiruchirappalli.

**OFFICE OF THE JOINT DIRECTOR OF OCCUPATIONAL SAFETY AND HEALTH,
CUDDALORE**

FACTORIES ACT 1948 TAMIL NADU FACTORIES RULES 1950

AND AMENDED ACT 1987

1. Section 40(2):

No building, building area (or) lane (or) machinery (or) any part of the production premises shall be located in such a manner as to pose a threat to the safety of human life.

But instead, **Crimson Organics Private Limited, Plot C9,10,11, Sipcot Industrial Complex, Kudikadu Village, Cuddalore Town, Cuddalore Taluk, Cuddalore District.** The factory manufactures **Fipronil Technical** and **Acetamiprid Technical** pesticides in **bulk**.

After **Isoprophyll Alcohol Recovery** inside **Reactor Vessel 108** installed in the factory at 07.40 A.M on 13.05.2021, **Acetamiprid impurites** inside the Reactor Vessel opened the **manhole** on the second floor and exited with high heat and high pressure due to the sudden high pressure inside the Reactor Vessel. , During the investigation on 13.05.2021, it was found that when **Acetamiprid impurites** come out and burn due to inhalation of **2-Cholorophrine gas** and release of **smoke**, 16 workers were admitted to Cuddalore Government Hospital due to suffocation of the workers working on the first, second and third floor and 4 of them died and 9 workers were being treated at Cuddalore Hospital and one worker at Mahatma Gandhi Hospital, Pondicherry.

This accident is caused by using Reactor Vessel 108 with the following security vulnerabilities.

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| 1 | A Bleeder Valve is installed in the middle with two valves for protection on the Steam line and if there is a leak in the Steam line there is no system to exit through the Bleeder Valve . |
| 2 | In the event of unforeseen factors such as heat and pressure, Reactor Vessel Safety valve is installed to discharge the pressure and the exhaust gases from it are not connected to the scrubber system in such a way that they do not spread and endanger the workers. |
| 3 | Workers could not easily leave the second floor because one of the two-tiered structures, which was set up for the immediate exit of workers, was closed for temporary work. Furthermore the workers went to the third floor as the stairs were blocked instead of going down when the gases were expelled due to the particular high pressure which caused the workers to breathe in the gases rising from above. |
| 4 | Occupation Health center has hired a Factory Medical Officer with the required qualifications and a full time Medical Assistant (with the appropriate qualifications) and its details have not been approved by the Chennai Director of Occupational Safety and Health. |

Completely eliminate the above unsafe conditions, fully repair Reactor Vessel 108, Hydro test at manufacturer's specified pressure, adjust Agitator, **adjust and ensure safety functions** of Primary, Secondary Commodores, Vapor line, Pipe lines and **the safety functions of other safety devices are adjusted, confirmed, certified by a qualified person authorized by the Chennai Occupational Safety and Health Director with examination and repair of plants** and equipments Eligibility Certificate safely implemented in the manufacturing and a restraining order is issued for the use of the factory **Fipronil Technical and Acetamiprid Technical Batch process** until the details are duly submitted to the Health Director and their approval is obtained. The restraining order is said to be effective immediately.

Therefore, within 30 days from the date of receipt of this order, the above mentioned unsafe conditions should be rectified and adequate security arrangements should be implemented along with the photograph and the evidence of the order. It also states that if it is not rectified within 30 days, the factories will take legal appropriate legal action without any prior notice.

Sd/-

Joint Director,
Occupational Safety and Health,
Cuddalore (In-charge)

ANNEXURE-H



CRIMSUN ORGANICS PRIVATE LTD

COPL/2021/036

22.05.2021

To

The Joint Director
Industrial Safety and Health,
Cuddalore.

Respected Sir,

Sub: Safe completion of the Fipronil and Acetamiprid batches, which are stopped abruptly due to the 13th May incident – Reg

Ref: Your prohibitory note date 14.05.2021.

We have received your letter cited in the reference, we carefully discussed the details with our safety team of experts and your guidance provided in the same. We humbly submit to your good offices that we will take your guidance in implementing the Corrective and Preventive actions and shall ensure the plant is always operated in the safest possible manner. We shall also file our appeal within the timeline stipulated by your good selves.

Meantime, for safe completion of the Fipronil and Acetamiprid batches, which are abruptly stopped held in various stages of the operations. For bring them to the safe completion, we checked all the systems thoroughly and corrected all the minor problems observed during last six days.

Now we are planning to commence the production from 21.05.2021 and in normal speed will be able complete the batches, which are incomplete for a period of 6 days. However, considering the current situation, we would like to take appropriate safety precautions required by the process and go bit slow on the production speed. As the reaction time of the process requires 5 to 6 days and for safe completion of the above said process, we require some more time.

Hence, we shall be grateful, if you could consider us giving time up to 31.05.2021 and render support so that we can complete all the in-process batches and ensure that the plant is completely safe for shutdown.

This is for your kind information.

Thanking you.

Yours faithfully,

For M/s Crimsun Organics Private Limited,

S. Ramesh Prabakaran
Managing Director.



Copy to

1. The Additional Director of Industrial Safety and Health, Trichy.
2. Director of Industrial Safety and Health, Chennai.

**Regd. Office / Works : C-9, C-10 & C-11, SIPCOT Industrial Complex, Kudikadu,
Cuddalore, Tamil Nadu - 607 005.**

Phone : 04142-239777, E-mail : info@crimsunorganics.com

CIN:U24299TN2016PTC111396

ANNEXURE-I

Appeal against Sec 40(2) – (Factories act 1948, as amended by
the Factories (Amendment) Act 1987, Tamil Nadu Factory rules 1950)

11th June 2021

Ref No: COPL/HRD/21-22/002

From

Crimsun Organics Pvt Ltd
C-9,C-10 & C-11, SIPCOT Industrial Complex
Kudikadu, Cuddalore
Tamil Nadu – 607 005.

To

The Director
Industrial Safety & Health
Thiru. Vi Ka Industrial Estate
Guindy, Chennai – 600 032

Dear Sir,

Sub: Corrective & Preventive Actions initiated by COPL as per Directions/Observations, issued by Joint Director, IS&H, Cuddalore.

Ref: 1) Your Order No. E /906/2021 dated 14.05.2021
2) The Factories Act, 1948 (Amended Act 1987), Tamil Nadu Factory Rules, 1950
3) Our communications dated 15.05.2021 & 22.05.2021

We would like to submit that, We, Crimsun Organics Private Limited, are a law-abiding organization and we had never taken chances, in following meticulously, the statutory provisions and the Rules of the Factories Act, 1948 and The Tamil Nadu Factory rules, 1950. It is pertinent to mention here that the incident culminating the prohibitory order is totally beyond our control and had resulted out of accident.

First of all, we pray your good self, to forego any punitive actions against us and on COPL organization as the livelihood of about 190 direct / indirect employees' families are hung upon the re-start of COPL.

We would like to submit further that over and above, what has been stipulated, in the Factories Act and Rules made therein, we would take extra measures and we assure that no such incidence will recur in future.

In line with our earlier communication, to your good self, we have safely completed the in-process batches and the plant is safely shutdown since 30th May 2021.

Now we have also completed the corrective / rectification and preventive actions, as stipulated by you; We have deployed competent personnel, approved by the Director, IS&H, as per direction, in the rectification / testing examining and certification process of the Equipment and Safety system, in question.

We have detailed overleaf, as a response to comply Directions / Observations issued by Joint Director, IS&H, Cuddalore, on how these Corrective / Rectification and Preventive actions are carried out in Kettle 108 and associated equipment system.



(Handwritten signature)



| No. | Direction / Inspection Observation issued by Joint Director, IS&H, Cuddalore | Safety System already in place, before the incident | Reply / Corrective and Additional Preventive Actions carried out by COPL, as per Directions |
|-----|--|--|---|
| 1. | <p>On the steam supply line to Reactor 108, No Safe Bleeder had been provided by COPL, in between the two steam valves. Bleeder valve could help when steam leaks or passing through closed valve.</p> | <p>In the design stage itself, eliminating the fire-prone heating media is an illustration of an in-built safe design. Here we have not gone for Electrical heaters or hot oil / thermic fluid-based heating, but chosen steam, which is an inherently safe media, from the angle of prevention of fire.</p> <p>Also, low pressure steam of less than 2.7 Bar G is employed in the limpet coil of the Distillation kettle, R-108. For controlling the steam pressure at below 2.7 Bar G, in the limpet coil to R-108, automatic steam pressure regulation valve (PRV) (Refer Annexure 1) is provided in the steam header; In addition to PRV, a secondary control viz. a Safety Valve is provided, at the downstream of PRV, and it is set to open, if the steam pressure reaches 2.9 Bar G. Also, a tertiary safety control viz. another safety valve in the limpet coil of the distillation kettle is provided to ensure steam pressure inside the limpet coil not to exceed 3.0 Bar G. Thus, Kettle R-108 is designed, with a three-fold safety protection, on steam heating.</p> <p>To monitor the temperature of the distillation mass, inside the reactor, Digital Resistance Temperature Detector (RTD) (Annexure 2) is provided. For monitoring the pressure inside the distillation kettle, pressure gauge is provided (Annexure 3).</p> | <p>As directed, defective steam line valve is replaced with new ones along with double valve with bleeder valve arrangement also provided. This arrangement would help, so that, steam could not reach the limpet coil, even the steam supply valve malfunctions. (Photo as Annexure- 4).</p> <p>In addition to the existing threefold control on steam pressure-protection, we have now introduced an Interlock control; We have provided a Temperature Alarm (Refer Annexure-5), for the kettle, with high temperature alarms, built-in with an interlock control, to stop the supply of steam into limpet coil. During high alarm, the operator has to act upon; By any reason, if operator is not nearby, the interlock arrangement would close the valve in the steam supply line. This Automatic Interlock arrangement (Refer Annexure-6). is a fully automated control system and thus eliminates, operator intervention, during emergency.</p> |



| No. | Direction / Inspection Observation issued by Joint Director, IS&H, Cuddalore | Safety System already in place, before the incident | Reply / Corrective and Additional Preventive Actions carried out by COPL, as per Directions |
|-----|--|--|--|
| 2. | There was no safety valve provided and connected to the scrubber system in the said reactor, to prevent, employees from the danger of emanating chemical vapors, in the event of unexpected raise in the temperature or pressure. | Kettle 108 is not a reactor and is a distillation kettle and operated at atmospheric pressure. | As per your direction, we have provided a Safety Relief valve (photo as Annexure- 7) ; and the same is connected to the existing scrubber. In future, any unforeseen gas emission will directly reach the scrubber and protect the operatives from chemical vapor exposure. |
| 3. | Since, one out of the two staircases, in second floor, was blocked for a temporary job, employees could not leave the floor easily. Also, when the gases emanating at high pressure, due to blocked passage in steps, employees, instead of coming down had to go to the third floor and suffocated, by virtue of breathing the gases travelling in the upper direction. | Every floor is provided with two sets of staircases to access. | During this incident, all employees working in the second floor have run to ground floor safely, to the ground floor through the other staircase. The partially blocked staircase is made on the previous day, with sign boards to move mechanical spares and was planned for the next day. Also, employees were advised to use the alternate staircase, that was available. 6 employees in the third floor due to panic, ran to the top floor / terrace; Out of 6 employees, 2 employees stayed at the top for 5- 10 minutes and came down to ground floor after the smoke reduced. The other four employees, might be in a panic situation, had rushed to come down, during the event, got exposed to the upcoming smoke/ fire combustion products, and got suffocated. |



| No. | Direction / Inspection Observation issued by Joint Director, IS&H, Cuddalore | Safety System already in place, before the incident | Reply / Corrective and Additional Preventive Actions carried out by COPL, as per Directions |
|-----|---|--|--|
| 4. | COPL has not obtained the approval from Director, IS&H for the particulars of their Occupational Health Centre (OHC), after employing full time Factory Medical officer and full-time medical attendants of requisite qualification. | <p>We have a well maintained OHC (Photo- Annexure 8), with 24 hours duty by medical attendants / nurses.</p> <p>Infrastructure like, Oxygen cylinder (one in OHC & one in ambulance), Oxygen concentrator, bed for patient, blood pressure meter, first aid medicines, dressing bandages, etc. are available and maintained satisfactorily. We have an actual strength of employees about 190 Nos. against the approved strength of 250 Nos. Also due to the current pandemic situation, we operate only at 50% strength of employees, at any point in time.</p> <p>On 1st September 2020, we have submitted details on OHC along with other requirements in our "On Site Emergency plan" to Deputy Director, IS&H, Cuddalore for approval (Annexure- 9 Letter Copy).</p> | <p>We will submit immediately, the particulars of our OHC to Director, IS & H, for the approval.</p> <p>Subsequent to your advice, we have engaged a physician/medical officer and he is regularly visiting our OHC.</p> <p>Copy of Factory Medical Officer Academic Certificates (Annexure -10)</p> <p>This is in addition to the round the clock duty being done by medical attendants / nurses.</p> |
| 5. | Primarily, COPL shall remove the unsafe conditions and deploy competent persons (approved by the Director, ISH) in the disciplines of Testing, Examination and Repair of Plant and Equipment and also Examination of Instruments & Safety system. Such competent persons shall repair the Kettle Distillation kettle R-108 in totality, doing hydro test at the manufacturer's prescribed pressure, repair agitator, addressing the unsafe conditions of associated primary & secondary condensers, vapor / other pipelines and other safety devices by rectifying and also | <p>Our existing maintenance practices are clearly written down and being followed.</p> <p>Examination of all vessels including pressure vessels and wherever applicable hydro, pneumatic and ultrasonic tests are conducted at the desired periodicity, in compliance with TN Factories Rules, 1950.</p> | <p>We have safely removed all the in-process materials from the Distillation kettle- 108 system and also associated piping and condensers were washed, cleaned and nitrogen purged.</p> <p>Competent persons has carried out necessary repair like replacement of defective valves, checking agitator system (Refer Annexure-11), hydro testing of Distillation kettle R-108 and other testing, examination of the whole system inclusive of safety systems, Vapor line, Primary, secondary (Refer Annexure-12) and the tertiary condensers and connected piping, and scrubber system</p> <p>After ensuring the safe condition, plant and equipment of Distillation kettle R-108 (Refer Annexure-13).</p> |



| | | |
|---|--|---|
| <p>ensuring their safe performance.</p> | | <p>system is fitness certified was issued by the competent person, for taking the R-108 system for process usage.</p> <p>The instrument and safety system are also tested, examined, and ensured safe condition and certified by the competent person. (Refer Annexure-14).</p> <p>Please refer Annexure-15 Certification for reuse. (Competency approval paper, etc.,)</p> |
|---|--|---|

We pray your Good Self, to permit us to re-start of our plant, at the earliest and also, we assure you, that we would be very cautious and motivate the operatives to strictly adhere to safe practices.

Thanking you.

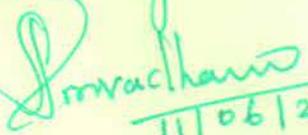
Yours faithfully

For M/s Crimsun Organics Private Limited




S Ramesh Prabakaran
(Occupier & Managing Director)

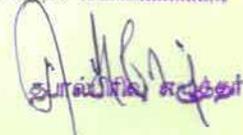
Cc: Joint Director, IS&H, Cuddalore
Cc: Additional Director, IS&H, Trichy
Encl: All Annexures as stated

Reviewed by

11/06/2021

Deputy Director,
Industrial Safety and Health, Cuddalore

சென்னை தொழில் பாதுகாப்பு மற்றும்
காது திட்டமிடல் துறைமன்றத்தில் உரைகள்
(உள்ள உள்சது என்சைமென்டு டெரிமென்டு)
பெற்றுக் கொள்ளப்பட்டது.

நாள் 14.06.21 நாள்


தொழில் பாதுகாப்பு

Crimsun Organics Pvt Ltd
Cuddalore – 05

PHOTOS



Crimsun Organics Pvt Ltd
Cuddalore - 05

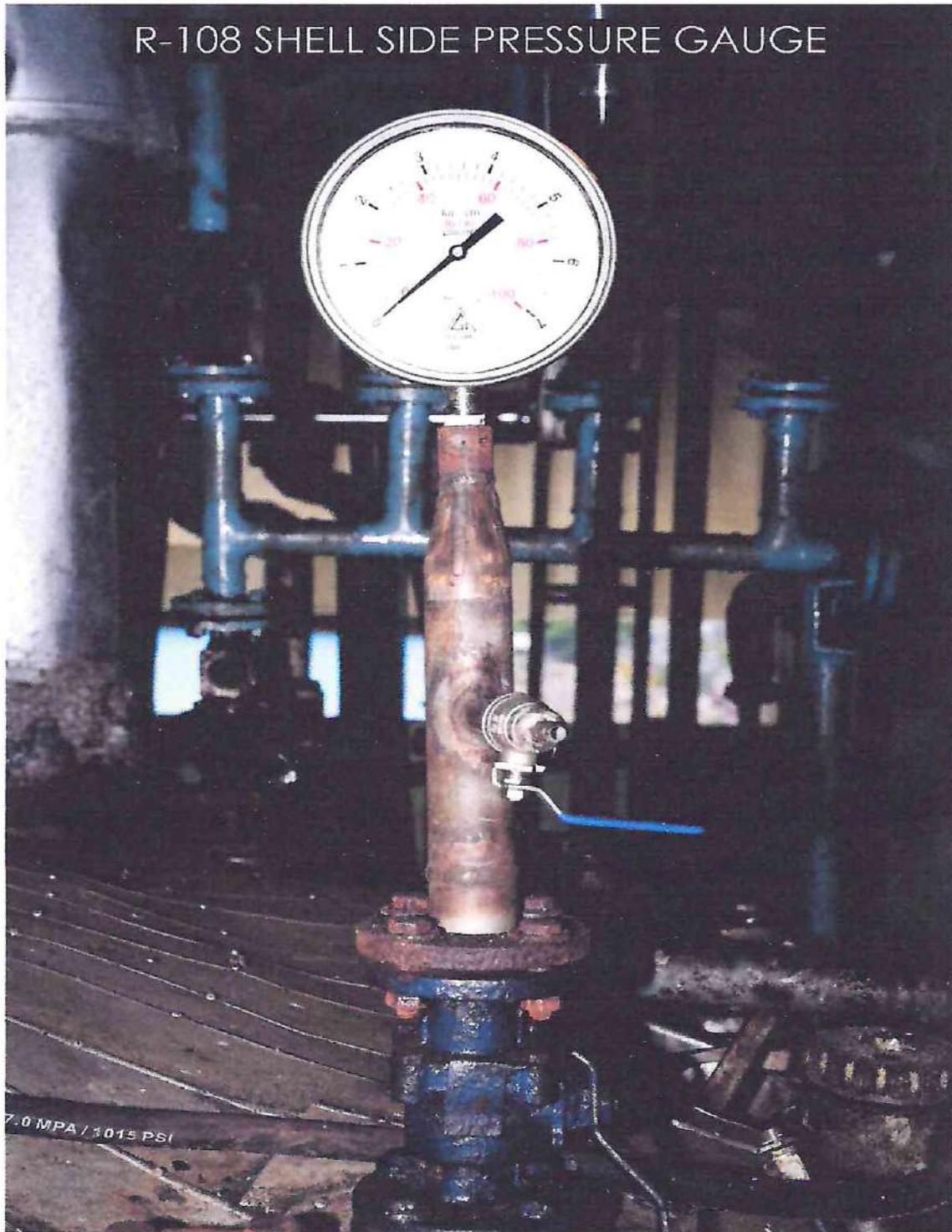
PHOTOS

R-108 KETTLE TEMPRATURE DISPLAY UNIT



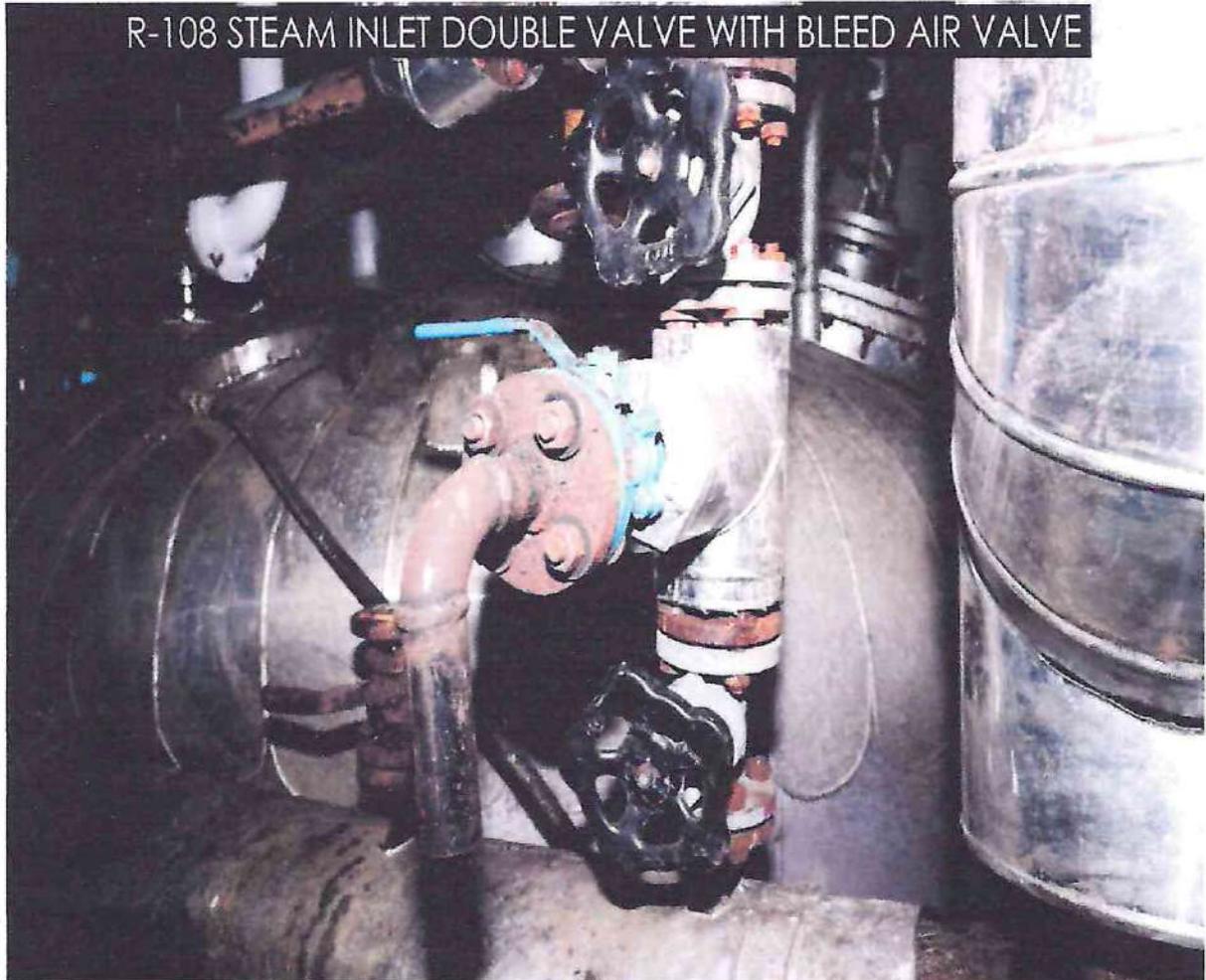
Crimsun Organics Pvt Ltd
Cuddalore - 05

PHOTOS



Crimsun Organics Pvt Ltd
Cuddalore - 05

PHOTOS



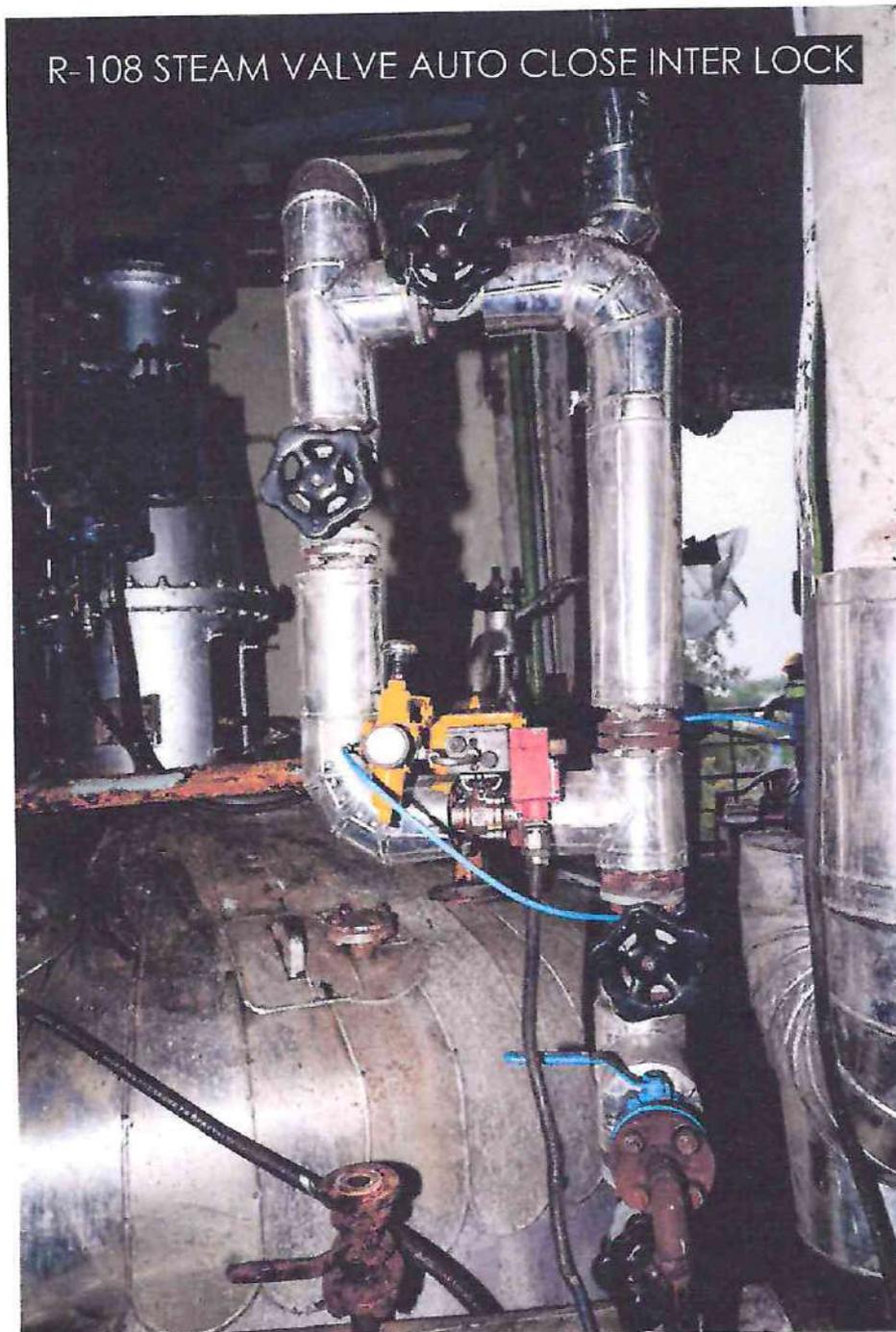
Crimsun Organics Pvt Ltd
Cuddalore - 05

PHOTOS



Crimsun Organics Pvt Ltd
Cuddalore - 05

PHOTOS



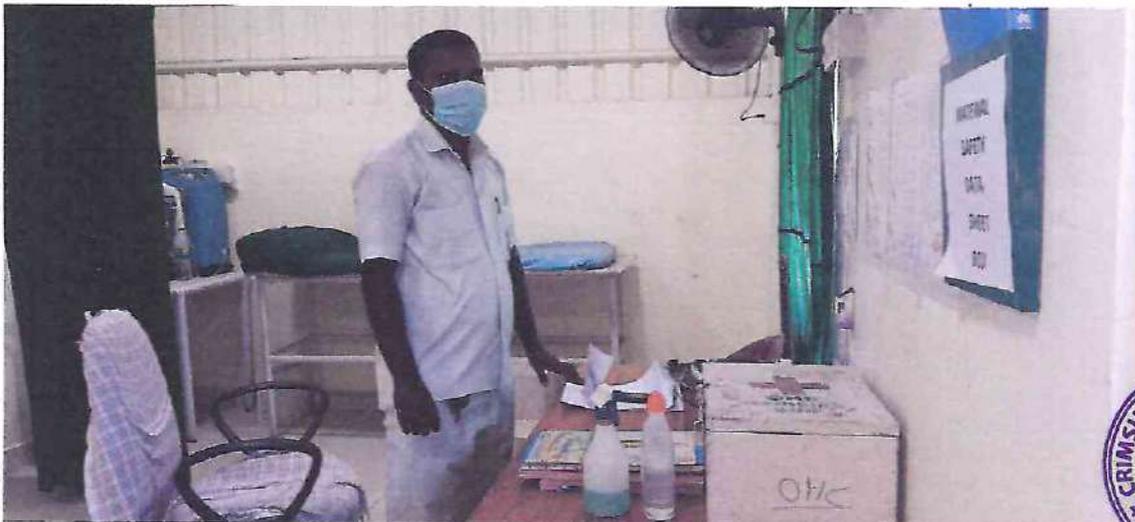
Crimsun Organics Pvt Ltd
Cuddalore – 05

PHOTOS



Crimsun Organics Pvt Ltd
Cuddalore – 05

Photos of Occupational Health Center



Crimsun Organics Pvt Ltd
Cuddalore – 05



CRIMSUN ORGANICS PRIVATE LTD

COPL/IOF/SFTY2020/CAF3

31.08.2020

To
The Joint Director
Industrial Safety and Health
Cuddalore.

Sub: Submission of On-site and Off-site Emergency plan for your approval – reg

With reference to the above subject, we would like to submit our Disaster Management Plan of our unit M/s Crimsun Organics Pvt Ltd, Cuddalore-607 005. Hereby we have enclosed the copy of Disaster Management Plan for your kind perusal.

Hence, we kindly request your approval for our Disaster Management Plan.

Thanking you,
Yours Faithfully,

For M/s Crimsun Organics Pvt Ltd.,

Mr. A. PARANITHARAN
Director Operation

Encl: Disaster Management Plan

By: [Signature]
31/8/2020
OFFICE OF THE JOINT DIRECTOR
INDUSTRIAL SAFETY AND HEALTH
CUDDALORE.

Regd. Office / Works : C-9, C-10 & C-11, SIPCOT Industrial Complex, Kudikadu,
Cuddalore, Tamil Nadu - 607 005.

Phone : 04142-239777, E-mail : info@crimsunorganics.com

CIN:U24299TN2016PTC111396



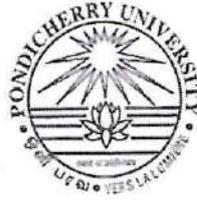
Annexure-10

Crimsun Organics Pvt Ltd
Cuddalore – 05

MEDICAL OFFICER ACADEMIC CERTIFICATES



Pondicherry University



The Vice-Chancellor and the Executive Council of the Pondicherry University, on the recommendations of the duly appointed Board of Examiners, hereby declare that

SHEELADEVI, S.

has been admitted to the Degree of

BACHELOR OF MEDICINE AND BACHELOR OF SURGERY

at the Examination held in **MAY 2009**

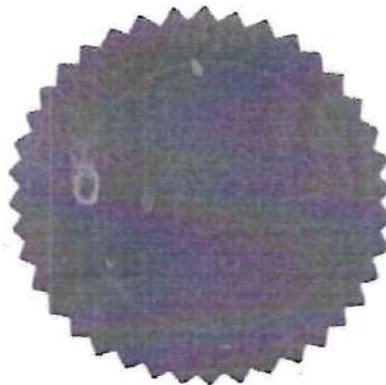
and has completed the prescribed period of Internship in

JULY 2010.

He / She was a bonafide

student of **VINAYAKA MISSION'S MEDICAL COLLEGE.**

Given under the Seal of the University



S. Srinivasa Rao
Registrar

Puducherry
Date **23 AUG 2010**

J. m. Narani



कारखाना सलाह सेवा और श्रम संस्थान महानिदेशालय
DIRECTORATE GENERAL FACTORY ADVICE SERVICE AND LABOUR INSTITUTES



भारत सरकार, श्रम और रोजगार मंत्रालय
GOVERNMENT OF INDIA, MINISTRY OF LABOUR & EMPLOYMENT

प्रमाणित किया जाता है कि एस. आर. एम. युनिवर्सिटी, कट्टनकुलथुक्कल्लेज ब्रेकाकी
डा. शीलादेवी सींगारम को, जिन्होंने शक संवत् १९३६ के
चैत्र मास (तदनुसार मार्च २०१५ ई.) में
आयोजित एसोसियेट फेलो ऑफ इंडस्ट्रीयल हेल्थ परीक्षा उत्तीर्ण की, आज यह
प्रमाण पत्र प्रदान किया गया.

Certified that *Dr. Sheeladevi Singaran*
of *S. R. M. University, Kattankulathur* passed
the Associate Fellow of Industrial Health Examination field in the
month of *March 2015* and has been conferred with this certificate.



ज्ञानार्जनम् सेवाहेतुषु विद्यते सर्वोत्तमम्

मुम्बई Mumbai

दिनांक Date 25/8/2015

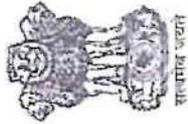


महानिदेशक

DIRECTOR GENERAL

[Signature]

GOVERNMENT OF INDIA
MINISTRY OF LABOUR &
EMPLOYMENT



DIRECTORATE GENERAL
FACTORY ADVISE SERVICE &
LABOUR INSTITUTES
SION, MUMBAI - 400 022.



CERTIFICATE OF REGISTRATION

REGISTRATION NUMBER : **01996**

DATED : 15.06.2015

| NAME AND FATHER'S NAME | PRESENT ADDRESS | PERMANENT ADDRESS | QUALIFICATION WITH DURATION OF THE COURSE |
|--------------------------------|--|----------------------------|--|
| DR SHEELADEVI SHRI SINGARAM | NO. 47, FIRST CROSS STREET, INDIRA NAGAR, THIRUVANDAR KOIL (POST), PUDUCHERRY - 605102 | SAME AS PRESENT ADDRESS | ASSOCIATE FELLOW OF INDUSTRIAL HEALTH (Post - Graduate Certificate Course in Industrial Health of three months duration) From 01.12.2014 to 28.02.2015 |

Certified that the entries made above are extracts from the REGISTER of successful candidates of AFIH Examination maintained by this Department. It is further certified that the qualification meets the requirement as specified in Model Rules framed under Factories (Amendment) Act. 1987.



[Signature]

Chairman
Academic Council of AFIH

INDUSTRIAL MEDICINE DIVISION
CENTRAL LABOUR INSTITUTE
GOVT. OF INDIA, MINISTRY OF LABOUR
SION, MUMBAI-400 022.



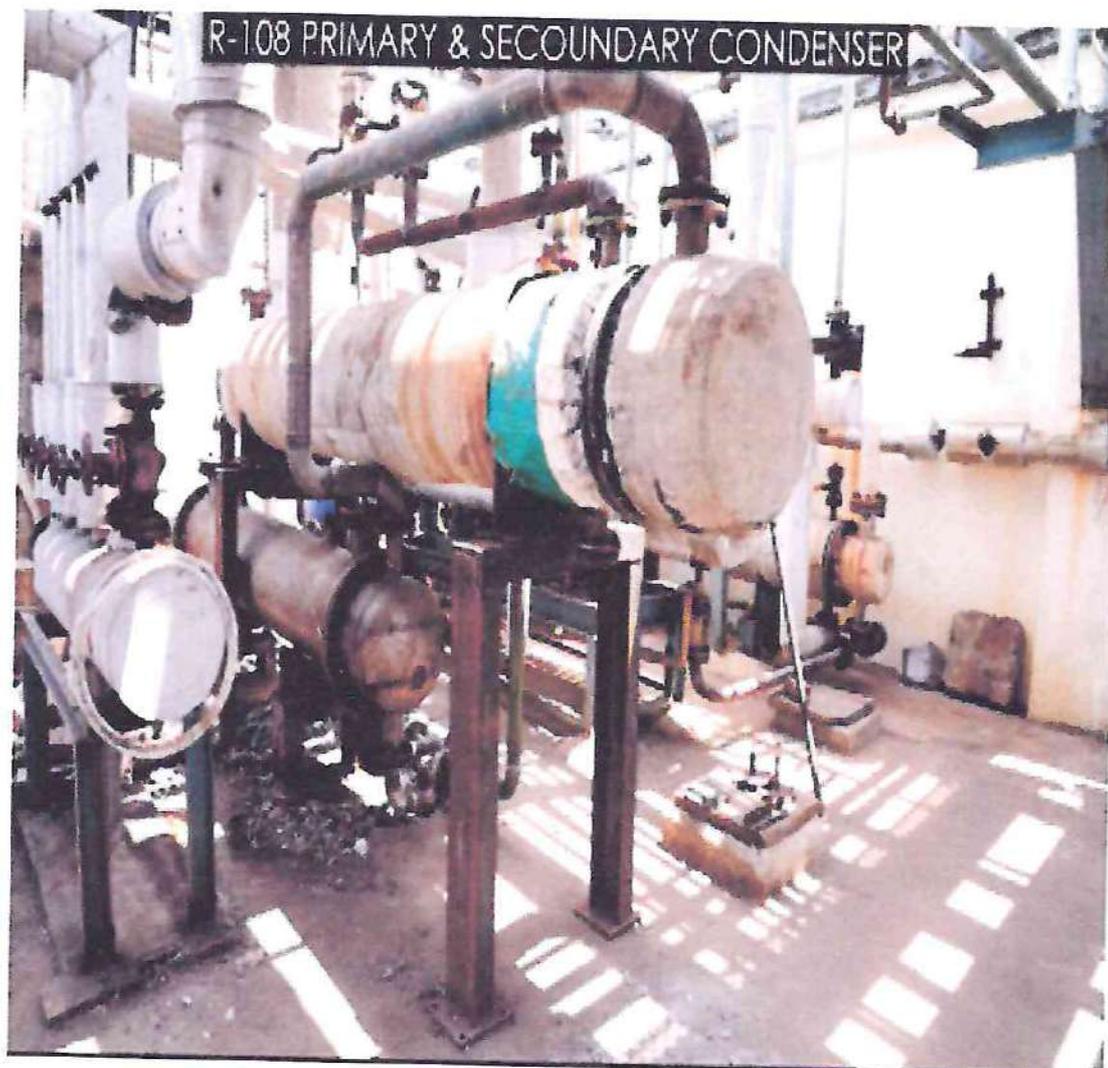
Crimsun Organics Pvt Ltd
Cuddalore – 05

PHOTOS



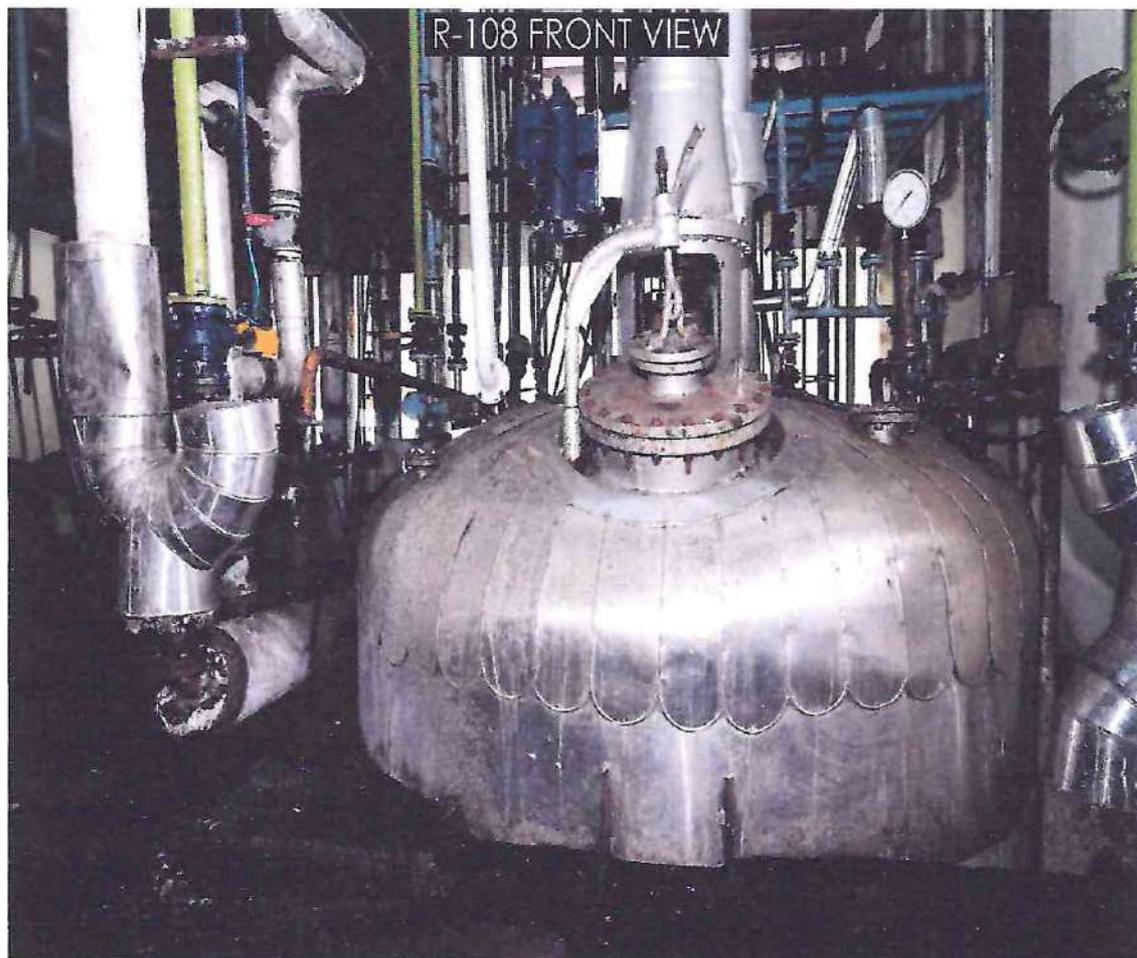
Crimsun Organics Pvt Ltd
Cuddalore - 05

PHOTOS



Crimsun Organics Pvt Ltd
Cuddalore – 05

PHOTOS



Annexure-14

Crimsun Organics Pvt Ltd
Cuddalore - 05

TEST CERTIFICATES



| REPORT OF HYDRO STATIC TEST FOR PRESSURE VESSEL | | | |
|--|--|----------------------------|-------------------------|
| (Under Rule No: 95 Schedule XVI Part II Para 15) | | | |
| Report NO.: COPL/ETPL/06-2021/001 | Date: 04/06/2021 | | |
| Name of the occupier | M/s. S.RAMESH PRABAKARAN. | | |
| Address of occupier | CRIMSUN ORGANICS PVT LTD C-9,C-10&C-11,SIPCOT INDUSTRIAL COMPLEX. KUDIKADU VILLAGE,CUDDALORE -607 005. | | |
| Name, Description and Distinctive Number of Pressure Vessel or Plant | R-108 DISTILLATION KETTLE (SHELL & LIMPET COIL) CAPACITY: 14000 LTRS, TYPE: VERTICAL, LOCATION: FIRST FLOOR AREA. FAB NO : SS316 | | |
| Name and Address of manufacturer and reference to their test certificate of competent person | M/s. DIPESH ENGINEERING WORKS. Level-3, Sej Plaza, Marve Road, Malad West, Mumbai - 400 064. General Arrangement & Details of SS 316 Reactor with Limpet. Drawing No : DEW/327/04 | | |
| Nature of process in which it is used | After receiving the MOTHER LIQUOR (ML) from tank T-1009, Isopropyl alcohol is distilled through Primary condenser & Secondary condenser. The uncondensed vapour goes to the tertiary condenser and there it is condensed using -20°C . Finally, if any uncondensed matter is there, that will go to the scrubber, where they will be scrubbed. The Residue is collected from bottom of the vessel. | | |
| Particulars of Pressure Vessel or plant: | Materials of Construction: FAB NO : SS316 | | |
| | | Shell Side | Limpet Side |
| | Design Pressure | 5/P.V kg/cm ² | 10 kg/cm ² |
| | Operating Pressure | 0-1/P.V kg/cm ² | 0-3.0kg/cm ² |
| | Test pressure | 6 kg/cm ² | 13 kg/cm ² |
| Date of Construction | : 09/09/2004 | | |
| Thickness of walls. | : 14mm | | |
| Position of the Vessel | : Vertical | | |
| Working Capacity | : 14KL | | |

CAJMM

Dr. C. SIVAKUMAR, M.E., Ph.D.,
Competent Person
ENSAFE TECHNOLOGIES PVT. LTD
18/166-A, Sugavaneswara Road,
Bafai Nanar, Fairlands



| | |
|---|--|
| Holding Time | : 20 Minutes |
| Is the pressure vessel or plant in Open or otherwise exposed to Whether or damp | : Under Roof |
| Are the required fittings and appliances provided in accordance with rules? | : Yes |
| Condition of pressure vessel | : External - Good Condition Internal - Good Condition |
| Condition of pressure vessel or plant (State any defects materially affecting the max. permissible working pressure of the working pressure or the safe vessel or plant) | : Hydro Static Pressure is applied in shell side at the pressure of 6 Kg/cm ² & Held for 20 Min. We observed no deviation. Hydro Static Pressure is applied in Limpet side at the pressure of 13 Kg/cm ² & Held for 20 Min. We observed no deviation. Agitator Condition is quit normal and have no lateral movements. Overall condition of R-108 distillation kettle is found satisfactory subject to the above condition. |
| I certify that on 04.06.2021 the pressure vessel described above was thoroughly cleaned & examined this pressure vessel, including its fittings, and that the above is a true report of my examination. | |
| Dr. C. SIVAKUMAR, M.E., Ph.D., Competent Person ENSAFE TECHNOLOGIES PVT. LTD., 18/166-A, Sugavaneswara Road, Balaji Nagar, Fairlands, Salem-636 004. Tamilnadu. | <p style="text-align: right;"><i>C. Siva</i> Dr. C. SIVAKUMAR, M.E., Ph.D., Competent Person,</p> <p style="text-align: right;">DISH Approval No.: H1/12510/2019 [Dated: 13.08.2019], Validity: 13.08.2019 TO 12.08.2022.</p> |
| This Certificate is issued based on the current conditions of the equipment at the time of inspection. User is the responsible for the proper maintenance and safe operation of all equipments. | |
| <p>ENSAFE TECHNOLOGIES PRIVATE LIMITED, SALEM</p> <p>75400 41186, 94434 28302</p> <p>Email Id: infoensafetech@gmail.com</p> <p>www.ensafetech.com</p> | |



REPORT OF HYDRO STATIC TEST FOR PRIMARY CONDENSER

(Under Rule No: 95 Schedule XVI Part II Para 15)

| | | |
|--|---|--|
| Report NO.: COPL/ETPL/06-2021/002 | Date: 04/06/2021 | |
| Name of the occupier | M/s. S.RAMESH PRABAKARAN. | |
| Address of occupier | M/s CRIMSUN ORGANICS PVT LTD C-9,C-10&C-11,SIPCOT INDUSTRIAL COMPLEX, KUDIKADU VILLAGE,CUDDALORE -607 095. | |
| Name, Description and Distinctive Number of Pressure Vessel or Plant | PRIMARY CONDENSER FROM R-108 CAPACITY: 20 m ² , TYPE: HORIZONTAL, LOCATION: TERRACE. FAB NO : SS316 | |
| Name and Address of manufacturer and reference to their test certificate of competent person | M/s MODERN EQUIPMENT CO. 9, Navnandanvan Industrial Estate, Off. L.B.S Marg, Mulund (West), Mumbai - 400 080. | |
| Nature of process in which it is used | Vapour Line is connected with tubeside. Cooling Water (+33°C) is connected with shell side. Vapour moves to primary condenser from the distillation kettle R-108, through tube side & condensed Isopropyl alcohol is collected in T-132. The uncondensed vapour goes to the secondary condenser. | |
| Particulars of Pressure Vessel or plant: | Materials of Construction: FAB NO : SS316 | |
| | | Shell Side Tube Side |
| | Design Pressure | 5 kg/cm ² 3 kg/cm ² |
| | Hydro Test Pressure | 7.5kg/cm ² 3.5 kg/Cm ² |
| | Temperature | 150° C 200° C |
| Date of Construction | : 09/09/2004 | |
| Thickness of walls. | : Shell thickness - 5 to 6mm Tube Outer Dfa -19.05mm | |
| Position of the Vessel | : Horizontal | |
| Holding Time | : 20 Minutes | |
| Is the pressure vessel or plant in Open or otherwise exposed to Whether or damp | : Under Roof | |

Comm
Dr. C. SIVAKUMAR, M.E., Ph.D.,
Competent Person
ENSAFE TECHNOLOGIES PVT. LTD.,
18/156-A, Sugavaneswara Road,
Balaji Nagar, Fairlands,
Salem-636 004, Tamilnadu.



| | |
|---|--|
| Are the required fittings and appliances provided in accordance with rules? | : Yes |
| Condition of pressure vessel | : External – Good Condition Internal– Good Condition |
| Condition of pressure vessel or plant (State any defects materially affecting the max. permissible working pressure of the working pressure or the safe vessel or plant) | : Hydro Static Pressure is applied on the shell side the pressure of 7.5 kg/cm ² & tube side the pressure of 3.5 kg/cm ² is Held for 20 Min. We observed no deviation. Overall condition found satisfactory subject to the above condition. |
| I certify that on 04.06.2021 the primary condenser described above was thoroughly cleaned & examined this pressure vessel, including its fittings, and that the above is a true report of my examination. | |
| <p>Dr. C. SIVAKUMAR, M.E., Ph.D., Competent Person ENSAFE TECHNOLOGIES PVT. LTD., 18/166-A, Sugavaneswara Road, Balaji Nagar, Fairlands, Salem-636 004. Tamilnadu.</p> | <p><i>Camm</i> Dr.C.SIVAKUMAR, M.E.,Ph.D., Competent Person, DISH Approval No.:H1/12510/2019 [Dated: 13.08.2019], Validity: 13.08.2019 TO 12.08.2022.</p> |
| <p>This Certificate is issued based on the current conditions of the equipment at the time of inspection. User is the responsible for the proper maintenance and safe operation of all equipment.</p> | |
| <p>-----</p> <p>ENSAFE TECHNOLOGIES PRIVATE LIMITED, SALEM</p> <p>75400 41186, 94434 28302</p> <p>Email Id: infoensafetech@gmail.com</p> <p>www.ensafetechnologies.com</p> | |



| REPORT OF HYDRO STATIC TEST FOR SECONDARY CONDENSER | | | |
|--|---|-----------------------|------------------------|
| (Under Rule No: 95 Schedule XVI Part II Para 15) | | | |
| Report NO.: COPL/ETPL/06-2021/003 | Date: 04/06/2021 | | |
| Name of the occupier | M/s. S.RAMESH PRABAKARAN. | | |
| Address of occupier | M/s CRIMSUN ORGANICS PVT LTD C-9,C-10&C-11,SIPCOT INDUSTRIAL COMPLEX, KUDIKADU VILLAGE,CUDDALORE -607 005. | | |
| Name, Description and Distinctive Number of Pressure Vessel or Plant | SECONDARY CONDENSER FROM R-108 CAPACITY: 15 m ² , TYPE: HORIZONTAL, LOCATION: TERRACE. FAB NO : SS316 | | |
| Name and Address of manufacturer and reference to their test certificate of competent person | M/s MODERN EQUIPMENT CO. 9, Navnandanvan Industrial Estate, Off. L.B.S Marg, Mulund (West), Mumbai - 400 080. | | |
| Nature of process in which it is used | Vapour Line is connected with tubeside. Chilling Water (+10 °C) is connected with shell side. Vapour received from primary condenser through tube side & Condensed Isopropyl alcohol is collected in T-133. The uncondensed vapour if any goes to tertiary condenser. | | |
| Particulars of Pressure Vessel or plant: | Materials of Construction: FAB NO : SS316 | | |
| | | Shell Side | Tube Side |
| | Design Pressure | 5 kg/cm ² | 3 kg/cm ² |
| | Hydro-Test Pressure | 7.5kg/cm ² | 3.5 kg/cm ² |
| | Temperature | 150° C | 200° C |
| Date of Construction | : 09/09/2004 | | |
| Thickness of walls. | : Shell thickness – 5 to 6mm Tube thickness -19.05mm | | |
| Position of the Vessel | : Horizontal | | |
| Holding Time | : 20 Minutes | | |
| Is the pressure vessel or plant in Open or otherwise exposed to Whether or damp | : Under Roof | | |
| Are the required fittings and appliances provided in accordance with rules? | : Yes | | |

Chithra
Dr. C. SIVAKUMAR, M.E., Ph.D.,
Competent Person
ENSAFE TECHNOLOGIES PVT. LTD.,
18/166-A, Sugavaneswara Road,
Balaji Nagar, Fairlands,
Salem-636 004, Tamilnadu.



| | |
|---|---|
| Condition of pressure vessel | : External – Good Condition Internal – Good Condition |
| Condition of pressure vessel or plant (State any defects materially affecting the max. permissible working pressure of the working pressure or the safe vessel or plant) | : Hydro Static Pressure is applied for shell side the pressure of 7.5 kg/cm ² & tube side the pressure of 3.5 kg/cm ² is held for 20 Min. We observed no deviation. Overall condition found satisfactory subject to the above condition. |
| I certify that on 04.06.2021 the secondary condenser described above was thoroughly cleaned & examined this pressure vessel, including its fittings, and that the above is a true report of my examination. | |
| <p>Dr. C. SIVAKUMAR, M.E., Ph.D., Competent Person ENSAFE TECHNOLOGIES PVT. LTD., 18/186-A, Sugavaneswara Road, Balaji Nagar, Fairlands, Salem-636 004. Tamilnadu.</p> | <p style="text-align: right;"><i>Camm</i> Dr. C. SIVAKUMAR, M.E., Ph.D., Competent Person, DISH Approval No.: H1/12510/2019 [Dated: 13.08.2019], Validity: 13.08.2019 TO 12.08.2022.</p> |
| This Certificate is issued based on the current conditions of the equipment at the time of inspection. User is the responsible for the proper maintenance and safe operation of all equipment. | |
| <p>-----</p> <p>ENSAFE TECHNOLOGIES PRIVATE LIMITED, SALEM</p> <p>75400 41186, 94434 28302</p> <p>Email Id: infoensafetech@gmail.com</p> <p>www.ensafetechologies.com</p> | |



REPORT OF HYDRO STATIC TEST FOR TERTIARY CONDENSER

(Under Rule No: 95 Schedule XVI Part II Para 15)

| | | |
|--|--|--|
| Report NO.: COPL/ETPL/06-2021/003 | Date: 04/06/2021 | |
| Name of the occupier | M/s. S.RAMESH PRABAKARAN. | |
| Address of occupier | M/s CRIMSUN ORGANICS PVT LTD C-9,C-10&C-11,SIPCOT INDUSTRIAL COMPLEX, KUDIKADU VILLAGE,CUDDALORE -607 005. | |
| Name, Description and Distinctive Number of Tertiary Condenser | TERTIARY CONDENSER FROM R-108 CAPACITY: 5 m ² , TYPE: HORIZONTAL, LOCATION: GROUND FLOOR-TOP FAB NO : SS316 | |
| Name and Address of manufacturer and reference to their test certificate of competent person | M/s MODERN EQUIPMENT CO. 9, Navnandanvan Industrial Estate, Off. L.B.S Marg, Mulund (West), Mumbai - 400 080. | |
| Nature of process in which it is used | Vapour Line is connected with tubeside. Chillied Brine (-20 ^o C) is connected with shell side. Uncondensed vapour from the secondary condenser enters the Tertiary condenser through tube side & if any uncondensed vapour is present, same will be condensed in Tertiary condenser. The uncondensed vapour phase is sent to scrubber. | |
| Particulars of Tertiary Condenser: | Materials of Construction: FAB NO : SS316 | |
| | | Shell Side Tube Side |
| | Design Pressure | 5 kg/cm ² 3 kg/cm ² |
| | Hydro Test Pressure | 7.5kg/cm ² 3.5 kg/cm ² |
| | Temperature. | -40 to +150 ^o C -30 to +200 ^o C |
| Date of Construction | : 09/09/2004 | |
| Thickness of walls. | : Shell thickness - 5 to 6mm Tube thickness -19.05mm | |
| Position of the Tertiary Condenser | : Horizontal | |
| Holding Time | : 20 Minutes | |
| Is the Tertiary Condenser in Open or otherwise exposed to Whether or damp | : Open Area | |


Dr. C. SIVAKUMAR, M.E., Ph.D.,
 Competent Person
 ENSAFE TECHNOLOGIES PVT. LTD.,
 18/166-A, Sugevaneswara Road,
 Bafaji Nagar, Fairlands,
 Salem-636 004. Tamilnadu.



| | |
|---|---|
| Are the required fittings and appliances provided in accordance with rules? | : Yes |
| Condition of Tertiary Condenser | : External – Good Condition Internal – Good Condition |
| Condition of Tertiary Condenser | : Hydro Static Pressure is applied for shell side the pressure of 7.5 kg/cm ² & tube side the pressure of 3.5 kg/cm ² is Held for 20 Min. We observed no deviation. Overall condition found satisfactory subject to the above condition. |

I certify that on 04.06.2021 the tertiary condenser described above was thoroughly cleaned & examined this condenser, including its fittings, and that the above is a true report of my examination.

Chinn
Dr. C. SIVAKUMAR, M.E., Ph.D.,
Competent Person,

Dr. C. SIVAKUMAR, M.E., Ph.D.,
Competent Person
ENSAFETECHNOLOGIES PVT. LTD.,
18/166-A, Sugavaneswara Road,
Balaji Nagar, Fairlands,
Salem-636 004, Tamilnadu.

DISH Approval No.: HI/12510/2019 [Dated: 13.08.2019],

Validity: 13.08.2019 TO 12.08.2022.

This Certificate is issued based on the current conditions of the equipment at the time of inspection. User is the responsible for the proper maintenance and safe operation of all equipment.

ENSAFETECHNOLOGIES PRIVATE LIMITED, SALEM

75400 41186, 94434 28302

Email Id: infoensafetech@gmail.com

www.ensafetech.com



| REPORT OF HYDRO STATIC TEST FOR VAPOUR LINE | |
|--|---|
| (Under Rule No: 95 Schedule XVI Part II Para 15) | |
| Report NO.: COPL/ETPL/06-2021/001 | Date: 06/06/2021 |
| Name of the occupier | M/s. S.RAMESH PRABAKARAN. |
| Address of occupier | M/s CRIMSUN ORGANICS PVT LTD C-9,C-10&C-11,SIPCOT INDUSTRIAL COMPLEX, KUDIKADU VILLAGE,CUDDALORE -607 005. |
| Name, Description and Distinctive Number of Vapour Line from R-108 | VAPOUR LINE FROM R-108 TO PRIMARY CONDENSER TYPE: VERTICAL LINE, LOCATION: SECOND FLOOR TO TERRACE. FAB NO : SS316 |
| Name and Address of manufacturer and reference to their test certificate of competent person | M/s. DIPESH ENGINEERING WORKS. Level-3, Sej Plaza, Marve Road, Malad West, Mumbai - 400 064. |
| Nature of process in which it is used | Vapour Line is connected with Primary Condenser Temperature : 30°C to 170 °C Materials of Construction: FAB NO : SS316 During the process, the mass temperature is increased from 30°C to 120° C. Through the vapour line , solvent vapour moves to primary condenser through tube side & Isopropyl alcohol is condensed and collected in the tank T-132. Uncondensed vapour if any enters the secondary condenser and then the tertiary condenser. |
| Thickness of walls. | : Thickness of the Vapour Line - 3.5mm |
| Position of the Vessel | : Vertical |
| Holding Time | : 20 Minutes |
| Is the pressure vessel or plant in Open or otherwise exposed to Whether or damp | : Second Floor -Third Floor- Terrace |
| Are the required fittings and appliances provided in accordance with rules? | : Yes |

Comm

Dr. G. SIVAKUMAR, M.E., Ph.D.,
Competent Person
ENSAFE TECHNOLOGIES PVT. LTD.,
18/166-A, Sugaveneswara Road,
Balaji Nagar, Fairlands,
Salem-636 904 Tamilnadu.



| | |
|---|--|
| Condition of Vapour Line | External – Good Condition |
| Condition of Vapour Line(State any defects materially affecting the max. permissible working pressure of the working pressure or the safe vessel or plant) | Hydro Static Pressure is applied for vapour line the pressure of 6kg/cm ² is held for 20 Min. We observed no deviation. Overall condition found satisfactory subject to the above condition. |
| I certify that on 04.06.2021 the Vapour Line described above was thoroughly cleaned & examined this Vapour Line, including its fittings, and that the above is a true report of my examination. | |
| <p style="text-align: right;"><i>CAVMA</i> Dr. C. SIVAKUMAR, M.E., Ph.D., Competent Person,</p> | |
| <p>Dr. C. SIVAKUMAR, M.E., Ph.D., Competent Person ENSAFTECHNOLOGIES PVT. LTD., 18/166-A, Sugavaneswara Road, Baleji Nagar, Fairlands, SALEM-5736004 Tamilnadu.</p> | <p>DISH Approval No.: H1/12510/2019 [Dated: 13.08.2019], Validity: 13.08.2019 TO 12.08.2022.</p> |
| This Certificate is issued based on the current conditions of the equipment at the time of inspection. User is the responsible for the proper maintenance and safe operation of all equipments. | |
| <p>-----</p> <p>ENSAFTECHNOLOGIES PRIVATE LIMITED, SALEM</p> <p>75400 41186, 94434 28302</p> <p>Email Id: infoensafetech@gmail.com</p> <p>www.ensafetech.com</p> | |



REPORT OF EXAMINATION OF SAFETY DEVICES
(Under Rule No. 95 Schedule XVI Part II Para 7)

Equipment : Pressure Gauge

Certificate No : COPL/ETPL/06-2021/001

Location : Second Floor /R-108 Limpet coil

1. Name of the company : CRIMSUN ORGANICS PRIVATE LIMITED
C-9, C-10 C-11, SIPCOT Industrial Complex
Kudikadu Village, Cuddalore -607 005.

2. Description

a. Name : Digital pressure Calibrator
b. Make : Druck
c. Serial No : 5487280
d. Report No : TSC/20-21/3253-4
e. Validity Up to : 03.08.2021

3. Instrument Specification

a. Range : 0-16 bar
b. Least count : 0.2 bar
c. Serial No : L164.59-01002
d. ID No : R-108

4. Set Pressure : As per Calibration Results set Pressure 0 -16 kg/cm²

5. Remarks : Pressure Gauge Functions and Observations Found Safe & Satisfactory

I certify that Pressure Gauge is examined by me on 05.06.2021, and the above report is true to my knowledge




(K.Prabhakaran, BE.,MIE.,CE.,PGDPE.,DIS)
Competent person

DISH Approval No.: H1/3791/2021 [Dated: 31.03.2021],
Validity: 31.03.2021 TO 30.03.2024.

Inspection Date : 05.06.2021

Due Date : 04.12.2021

This Certificate is issued based on the current conditions of the equipment at the time of inspection. User is the responsible for the proper maintenance and safe operation of all equipment.

ENSAFTE TECHNOLOGIES PRIVATE LIMITED, SALEM

75400 41186, 94434 28302

Email Id: infoensafetech@gmail.com

www.ensafetech.com



REPORT OF EXAMINATION OF SAFETY DEVICES
(Under Rule No: 95 Schedule XVI Part II Para 7)

Equipment : Pressure Gauge

Certificate No : COPL/ETPL/06-2021/002

Location : Ground Floor-Boiler house, Nitrogen Pressure regulation valve downstream line.

1. Name of the company : CRIMSUN ORGANICS PRIVATE LIMITED
C-9, C-10 C-11, SIPCOT Industrial Complex
Kudikadu Village, Cuddalore -607 005.

2. Description

a. Name : Digital pressure Calibrator
b. Make : Druck
c. Serial No : 5487280
d. Report No : TSC/20-21/3253-4
e. Validity Up to : 03.08.2021

3. Instrument Specification

a. Range : 0-16 kg/cm²
b. Least count : 0.2 kg/cm²
c. Serial No : L164.59-00961
d. Model No : SS316L
e. ID No : Nitrogen Pressure reducing station.

4. Set Pressure : As per Calibration Results set Pressure 0 -16 kg/cm²

5. Remarks : Pressure Gauge Functions and Observations Found Safe & Satisfactory

I certify that Pressure Gauge is examined by me on 05.06.2021, and the above report is true to my knowledge




(K.Prabhakaran, BE.,MIE.,CE.,PGDPE.,DIS)
Competent person

DISH Approval No. : H1/3791/2021 [Dated: 31.03.2021],
Validity: 31.03.2021 TO 30.03.2024.

Inspection Date : 05.06.2021

Due Date : 04.12.2021

This Certificate is issued based on the current conditions of the equipment at the time of inspection. User is the responsible for the proper maintenance and safe operation of all equipment.

ENSAFE TECHNOLOGIES PRIVATE LIMITED, SALEM

75400 41186, 94434 28302

Email Id: infoensafetech@gmail.com

www.ensafetech.com

REPORT OF EXAMINATION OF SAFETY DEVICES
(Under Rule No: 95 Schedule XVI Part II Para 7)

Equipment : Pressure Gauge
 Certificate No : COPL/ETPL/06-2021/003
 Location : Ground Floor-Boiler house, LP Steam Pressure regulation valve downstream line.
 1. Name of the company : CRIMSUN ORGANICS PRIVATE LIMITED
 C-9, C-10 C-11, SIPCOT Industrial Complex
 Kudikadu Village, Cuddalore -607 005.

2. Description

f. Name : Digital pressure Calibrator
 g. Make : Druck
 h. Serial No : 5487280
 i. Report No : TSC/20-21/3253-4
 j. Validity Up to : 03.08.2021

3. Instrument Specification

f. Range : 0-16 kg/cm²
 g. Least count : 0.2 kg/cm²
 h. Serial No : L164.59-01007
 i. Model No : SS316L
 j. ID No : Air Dryer - A.

4. Set Pressure : As per Calibration Results set Pressure 0 -16 kg/cm²

5. Remarks : Pressure Gauge Functions and Observations Found Safe & Satisfactory

I certify that Pressure Gauge is examined by me on 05.06.2021, and the above report is true to my knowledge




(K.Prabhakaran, BE.,MIE.,CE.,PGDPE.,DIS)
 Competent person

Approval No. : H1/3791/2021 [Dated: 31.03.2021],
 Validity: 31.03.2021 TO 30.03.2024.

Inspection Date : 05.06.2021

Due Date : 04.12.2021

This Certificate is issued based on the current conditions of the equipment at the time of inspection. User is the responsible for the proper maintenance and safe operation of all equipment.

ENSAFE TECHNOLOGIES PRIVATE LIMITED, SALEM

75400 41186, 94434 28302

Email Id: infoensafetech@gmail.com

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REPORT OF EXAMINATION OF SAFETY DEVICES
(Under Rule No: 95 Schedule XVI Part II Para 7)

Equipment : Pressure Gauge

Certificate No : COPL/BTPL/06-2021/004

Location : Second Floor- R-108 Shell Side

1. Name of the company : CRIMSUN ORGANICS PRIVATE LIMITED
C-9, C-10 C-11, SIPCOT Industrial Complex
Kudikadu Village, Cuddalore -607 005.

2. Description

k. Name : Digital pressure Calibrator
l. Make : Druck
m. Serial No : 5487280
n. Report No : TSC/20-21/3253-4
o. Validity Up to : 03.08,2021

3. Instrument Specification

k. Range : 0-7 kg/cm²
l. Least count : 0.2 kg/cm²
m. Serial No : J39DMU-E19-1171
n. Model No : SS316L
o. ID No : Chilled Water Pump I.

4. Set Pressure : As per Calibration Results set Pressure 0 -7 kg/cm²

5. Remarks : Pressure Gauge Functions and Observations Found Safe
& Satisfactory

I certify that Pressure Gauge is examined by me on 05.06.2021, and the above report is true to my knowledge




(K.Prabhakaran, BE.,MIE.,CE.,PGDPE.,DIS)
Competent person

DISH Approval No. : H1/3791/2021 [Dated: 31.03.2021],
Validity: 31.03.2021 TO 30.03.2024.

Inspection Date : 05.06.2021

Due Date : 04.12.2021

This Certificate is issued based on the current conditions of the equipment at the time of inspection. User is the responsible for the proper maintenance and safe operation of all equipment.

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75400 41186, 94434 28302

Email Id: infoensafetech@gmail.com

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REPORT OF EXAMINATION OF SAFETY DEVICES
(Under Rule No: 95 Schedule XVI Part II Para 7)

Equipment : Resistance Temperature Detector (RTD) with Alarm and Steam valve interlock
Certificate No : COPL/ETPL/06-2021/005
Location : Second Floor /R-108

1. Name of the company : **CRIMSUN ORGANICS PRIVATE LIMITED**
C-9, C-10 C-11, SIPCOT Industrial Complex
Kudikadu Village, Cuddalore -607 005.

2. Description

a. Name : Multifunction Calibrator RTD
b. Make : Vaiseshika Electron Devices
c. Serial No : 8800013533
d. Report No : TSC/20-21/2632-2-2
e. Validity Up to : 14.10.2021

3. Instrument Specification

a. Range : -50 to 200 ° C
b. Least count : 0.1° C
c. Serial No : --
d. Model No : DP120H-F-0-1-X
e. ID No : R-108

4. Calibration Certificate for RTD

a. Nomenclature : Thumbwheel Decade Resistance Box
b. Model : 7400-A
c. Serial No : 7549
d. Manufactured by Month, year : Vaiseshika Electron Devices
e. Calibration/Operating Procedure: VED-NABL-WI-ET, Procedure 8.0

5. Set Pressure : When Temperature reached 120° C the Hooter alarm is Initiated,
When temperature reached 125° C the steam valve interlock acted and closed the steam valve automatically.

5. Remarks : RTD Functions and Observations Found Safe & Satisfactory

I certify that Pressure Gauge is examined by me on 05.06.2021, and the above report is true to my knowledge.




(K.Prabhakaran, BE.,MIE.,CE.,PGDPE.,DIS)
Competent person

DISH Approval No. : H1/3791/2021 [Dated: 31.03.2021],
Validity: 31.03.2021 TO 30.03.2024.

Inspection Date : 05.06.2021
Due Date : 04.12.2021

This Certificate is issued based on the current conditions of the equipment at the time of inspection. User is the responsible for the proper maintenance and safe operation of all equipment.

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REPORT OF EXAMINATION OF SAFETY DEVICES
(Under Rule No:95 Schedule XVI Part II Para 7)

Equipment : Temperature Gauge Resistance Temperature Detector (RTD)

Certificate No : COPL/ETPL/06-2021/006

Location : Second Floor /R-108

1. Name of the company : CRIMSUN ORGANICS PRIVATE LIMITED
C-9, C-10 C-11, SIPCOT Industrial Complex
Kudikadu Village, Cuddalore -607 005.

2. Description

a. Name : Multifunction Calibrator RTD
b. Make : --
c. Serial No : 8800013533616
d. Report No : TSC/20-21/2632-2-2
e. Validity Up to : 25.07.2021

3. Instrument Specification

a. Range : -50 to 200^o C
b. Least count : 0.1^o C
c. Serial No : 2008066
d. Model No : DPI01-E1-3
e. ID No : R-108

4. Set Temperature : As per Calibration Results set temperature -50 to 200^o C

5. Remarks : Temperature Gauge Functions and Observations Found
Safe & Satisfactory

I certify that Pressure Gauge is examined by me on 05.06.2021, and the above report is true to my knowledge.




(K.Prabhakaran, BE.,MIE.,CE.,PGDPE.,DIS)
Competent person
DISE Approval No. : H1/3791/2021 [Dated: 31.03.2021],
Validity: 31.03.2021 TO 30.03.2024.

Inspection Date : 05.06.2021

Due Date : 04.12.2021

This Certificate is issued based on the current conditions of the equipment at the time of inspection. User is the responsible for the proper maintenance and safe operation of all equipment.

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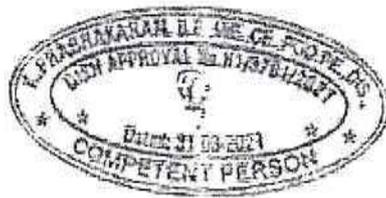
Report of Examination of Instruments & Safety Devices

(Prescribed Under Section 87 Rule 95, Schedule XVI Part - II Para 7 Of Tamil Nadu Factories Rules 1950)

Test Certificate No.: COPL/ETPL / 06 - 2021/001

- | | |
|---|--|
| 1. Name and Address of the Company | : M/s.CRIMSUN ORGANICS PVT LTD, C-9,C-10&C-11,SIPCOT INDUSTRIAL COMPLEX,KUDIKADU VILLAGE,CUDDALORE -607 005. |
| 2. Distinguish Number or Mark, If Any and Description Sufficient to Identify the Safety Valve | : SAFETY RELIEF VALVE Valve Type: Spring Loaded - 2" Inches Flanged Valve Set Pressure at 4.0 bar G Valve Opening Pressure at 4.0 bar G Valve Closing Pressure at 3.6 bar G ID.NO.: PV 01 |
| 3. Year of Construction or First Taken to Use | : 2021 |
| 4. Location of the Equipment | : Distillation Kettle (R-108)Shell Side |
| 5. Date and number of the certificate relating to any test and examination made under rules (95) together with the name and address of person who issued the certificate. | : First time inspection |
| 6. Working condition of the instrument | : Performance and working condition of the safety relief valve is found safe & satisfactory |
| 7. Any other remarks | : Pressure test is performed by pneumatic test used Nitrogen gas with recommended typical piping schematic arrangement and ensures the safety reliability and leak tightness of safety valve. |

I certify that on 06/06/2021, the safety valve thoroughly examined & tested by me, and the above is a true report of examination.

(K.Prabhakaran, BE., MIE., CE., PGDPE., DIS)

Competent person

DISH Approval No. : H1/3791/2021 [Dated:

31.03.2021],

Validity: 31.03.2021 TO 30.03.2024.

Inspection Date : 06.06.2021

Due Date : 05.12.2021

This Certificate is issued based on the current conditions of the equipment at the time of inspection. User is the responsible for the proper maintenance and safe operation of all equipment.

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Report of Examination of Instruments & Safety Devices

(Prescribed Under Section 87 Rule 95, Schedule XVI Part - II Para 7 Of Tamil Nadu Factories Rules 1950)

Test Certificate No.: COPL/ETPL / 06 - 2021/002

- | | |
|---|--|
| 1. Name and Address of the Company | : M/s.CRIMSUN ORGANICS PVT LTD, C-9, C-10 & C-11, SIPCOT INDUSTRIAL COMPLEX, KUDIKADU VILLAGE, CUDDALORE - 607 005. |
| 2. Distinguish Number or Mark, If Any and Description Sufficient to Identify The Safety Valve | : SAFETY RELIEF VALVE Valve Type: Spring Loaded -1.5" Inches Flanged Valve Setting Pressure at 2.5 bar G, Valve Opening Pressure at 2.5 bar G Valve Closing Pressure at 2.4 bar G ID.NO.: PV 02 |
| 3. Year of Construction or First Taken to Use | : 2019 |
| 4. Location of the equipment | : Nitrogen Header Pressure Reducing Valve Station |
| 5. Date and number of the certificate relating to any test and examination made under rules (95) together with the name and address of person who issued the certificate. | : First time inspection |
| 6. Working condition of the instrument | : Performance and working condition of the safety relief valve is found safe & satisfactory |
| 7. Any other remarks | : Pressure test is performed by pneumatic test uses nitrogen gas with recommended typical piping schematic arrangement and ensures the safety reliability and leak tightness of safety valve. |

I certify that on 06/06/2021, the safety valve thoroughly examined & tested by me, and the above is a true report of examination.




(K.Prabhakaran, BE.,MIE.,CE.,PGDPE.,DIS)
Competent person
DISH Approval No. : H1/3791/2021 [Dated:
31.03.2021],
Validity: 31.03.2021 TO 30.03.2024.

Inspection Date : 06.06.2021

Due Date : 05.12.2021

This Certificate is issued based on the current conditions of the equipment at the time of inspection. User is the responsible for the proper maintenance and safe operation of all equipment.

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Report of Examination of Instruments & Safety Devices

(Prescribed Under Section 87 Rule 95, Schedule XVI Part - II Para 7 Of Tamil Nadu Factories Rules 1950)

Test Certificate No.: COPL/ETPL / 06 - 2021/003

- | | |
|---|--|
| 1. Name and Address of the Company | : M/s.CRIMSUN ORGANICS PVT LTD, C-9, C-10 & C-11, SIPCOT INDUSTRIAL COMPLEX, KUDIKADU VILLAGE, CUDDALORE - 607 005. |
| 2. Distinguish Number or Mark, If Any and Description Sufficient to Identify the Safety Valve | : SAFETYRELIEF VALVE Valve Type: Spring Loaded - 1" Inches Flanged Valve Setting Pressure at 3.0 bar G Valve Opening Pressure at 3.0 bar G, Valve Closing Pressure at 2.8 bar G ID.NO.: PV 03 |
| 3. Year of Construction or First Taken to Use | : 2018 |
| 4. Location of the equipment | : R-108 Limpet Coil Steam safety Valve |
| 5. Date and number of the certificate relating to any test and examination made under rules (95) together with the name and address of person who issued the certificate. | : First time inspection |
| 6. Working condition of the instrument | : Performance and working condition of the safety relief valve is found safe & satisfactory |
| 7. Any other remarks | : Pressure test is performed by pneumatic test uses nitrogen gas with recommended typical piping schematic arrangement and ensures the safety reliability and leak tightness of safety valve. |

I certify that on 06/06/2021, the safety valve thoroughly examined & tested by me, and the above is a true report of examination.




(K.Prabhakaran, BE., MIE., CE., PGDPE., DIS)
Competent person
DISH Approval No. : H1/3791/2021 [Dated:
31.03.2021],
Validity: 31.03.2021 TO 30.03.2024.

Inspection Date : 06.06.2021

Due Date : 05.12.2021

This Certificate is issued based on the current conditions of the equipment at the time of inspection. User is the responsible for the proper maintenance and safe operation of all equipment.

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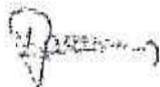
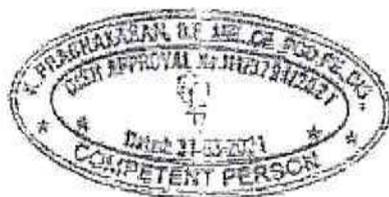
Report of Examination of Instruments & Safety Devices

(Prescribed Under Section 87 Rule 95, Schedule XVI Part - II Para 7 Of Tamil Nadu Factories Rules 1950)

Test Certificate No.: COPL/ETPL / 06 - 2021/004

- | | |
|---|---|
| 1. Name and Address of the Company | : M/s.CRIMSUN ORGANICS PVT LTD, C-9, C-10 & C-11, SIPCOT INDUSTRIAL COMPLEX, KUDIKADU VILLAGE, CUDDALORE - 607 005. |
| 2. Distinguish Number or Mark, If Any and Description Sufficient to Identify the Safety Valve | : SAFETY RELIEF VALVE Valve Type: Spring Loaded - 2" Inches Threaded Valve Setting Pressure at 4.0 barG Valve Opening Pressure at 4.0 bar G, Valve Closing Pressure at 3.8 bar G ID.NO.: PV 04 |
| 3. Year of Construction or First Taken to Use | : 2021 |
| 4. Location of the equipment | : LP steam line PRV down stream safety valve |
| 5. Date and number of the certificate relating to any test and examination made under rules (95) together with the name and address of person who issued the certificate. | : First time inspection |
| 6. Working condition of the instrument | : Performance and working condition of the safety relief valve is found safe & satisfactory |
| 7. Any other remarks | : Pressure test is performed by pneumatic test uses nitrogen gas with recommended typical piping schematic arrangement and ensures the safety reliability and leak tightness of safety valve. |

I certify that on 06/06/2021, the safety valve thoroughly examined & tested by me, and the above is a true report of examination.

(K.Prabhakaran, BE.,MIE.,CE.,PGDPE.,DIS)

Competent person

DISH Approval No. : H1/3791/2021 [Dated:

31.03.2021],

Validity: 31.03.2021 TO 30.03.2024.

Inspection Date : 06.06.2021

Due Date : 05.12.2021

This Certificate is issued based on the current conditions of the equipment at the time of inspection. User is the responsible for the proper maintenance and safe operation of all equipment.

ENSAFE TECHNOLOGIES PRIVATE LIMITED, SALEM

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Email Id: infoensafetech@gmail.com

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Report of Examination of Instruments & Safety Devices

(Prescribed Under Section 87 Rule 95, Schedule XVI Part - II Para 7 Of Tamil Nadu Factories Rules 1950)

Test Certificate No.: COPL/ETPL / 06 - 2021/005

- | | |
|---|--|
| 1. Name and Address of the Company | : M/s.CRIMSUN ORGANICS PVT LTD, C-9, C-10 & C-11, SIPCOT INDUSTRIAL COMPLEX, KUDIKADU VILLAGE, CUDDALORE - 607 005. |
| 2. Distinguish Number or Mark, If Any and Description Sufficient to Identify the Safety Valve | : PRESSURE REDUCTION VALVE Valve Type: Spring Loaded – 1.5" Inches Threaded Valve Up-stream Pressure 6.0 barG Valve down-stream Pressure 2.0 bar G, ID.NO.: PRV 01 |
| 3. Year of Construction or First Taken to Use | : 2019 |
| 4. Location of the equipment | : Nitrogen header line. |
| 5. Date and number of the certificate relating to any test and examination made under rules (95) together with the name and address of person who issued the certificate. | : First time inspection |
| 6. Working condition of the instrument | : Performance and working condition of the safety relief valve is found safe & satisfactory |
| 7. Any other remarks | : Pressure test is performed by pneumatic test uses nitrogen gas with recommended typical piping schematic arrangement and ensures the safety reliability and leak tightness of pressure reducing valve. |

I certify that on 06/06/2021, the pressure reducing valve thoroughly examined & tested by me, and the above is a true report of examination.




(K.Prabhakaran, BE.,MIE.,CE.,PGDPE.,DIS)
Competent person
DISH Approval No. : H1/3791/2021 [Dated:
31.03.2021],
Validity: 31.03.2021 TO 30.03.2024.

Inspection Date : 06.06.2021
Due Date : 05.12.2021

This Certificate is issued based on the current conditions of the equipment at the time of inspection. User is the responsible for the proper maintenance and safe operation of all equipment.

ENSAFETECHNOLOGIES PRIVATE LIMITED, SALEM
75400 41186, 94434 28302
Email Id: infoensafetech@gmail.com
www.ensafetechtechnologies.com



Report of Examination of Instruments & Safety Devices

(Prescribed Under Section 87 Rule 95, Schedule XVI Part - II Para 7 Of Tamil Nadu Factories Rules 1950)

Test Certificate No.: COPL/ETPL / 06 - 2021/006

- | | |
|---|--|
| 1. Name and Address of the Company | : M/s.CRIMSUN ORGANICS PVT LTD, C-9, C-10 & C-11, SIPCOT INDUSTRIAL COMPLEX, KUDIKADU VILLAGE, CUDDALORE - 607 005. |
| 2. Distinguish Number or Mark, If Any and Description Sufficient to Identify The Safety Valve | : PRESSURE REDUCTION VALVE Valve Type: Spring Loaded - 3" Inches Flanged Valve Up-stream Pressure 9.0barG Valve down-stream Pressure 3.4 bar G, ID.NO.: PRV 02 |
| 3. Year of Construction or First Taken to Use | : 2019 |
| 4. Location of the equipment | : Boiler house low pressure steam header line. |
| 5. Date and number of the certificate relating to any test and examination made under rules (95) together with the name and address of person who issued the certificate. | : First time inspection |
| 6. Working condition of the instrument | : Performance and working condition of the safety relief valve is found safe & satisfactory |
| 7. Any other remarks | : Pressure test is performed by pneumatic test uses nitrogen gas with recommended typical piping schematic arrangement and ensures the safety reliability and leak tightness of pressure reducing valve. |

I certify that on 06/06/2021, the pressure reducing valve thoroughly examined & tested by me, and the above is a true report of examination.




(K.Prabhakaran, BE., MIE., CE., PGDPE., DIS)
Competent person
DISH Approval No. : H1/3791/2021 [Dated:
31.03.2021],
Validity: 31.03.2021 TO 30.03.2024.

Inspection Date : 06.06.2021
Due Date : 05.12.2021

This Certificate is issued based on the current conditions of the equipment at the time of inspection. User is the responsible for the proper maintenance and safe operation of all equipment.

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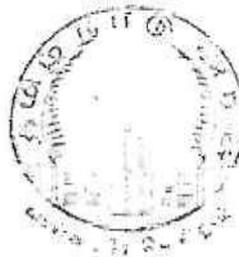


Annexure-15

Crimsun Organics Pvt Ltd
Cuddalore – 05

COMPETENCY APPROVAL





GOVERNMENT OF TAMIL NADU

DIRECTORATE OF INDUSTRIAL SAFETY AND HEALTH

CHENNAI - 32.

No.H1 /14215/2018

Dated: 02.08.2018

CERTIFICATE OF COMPETENCY ISSUED TO A PERSON

(Under Sub-Rule (3) of Rule 2A)

I, K.Kaliannan, the Director, Industrial Safety and Health in exercise of the powers conferred on me under Section 2 (ca) of the Factories Act and the rules made there under, hereby recognize Thiru.C.SIVAKUMAR, Plot No.1148 , Anna Nagar West End Colony, Mugappair, Chennai- 600 050 to be the Competent Person for the purpose of carrying out examinations and certification of following Items under the Factories Act, 1948 and the Tamilnadu Factories, Rules 1950 in factories located in the state of Tamilnadu.

| | | |
|----|--|--|
| 1. | Section-87 Rule 95 Schedule XVI., Part V, Para 5 | Equipments and Tank made from Reinforced Plastics |
| 2. | Section-87 Rule 95 Schedule XXIII | Process of Extracting Oil and Fats in Solvent Extraction Plant |

This certificate is valid for three years from 02.08.2018 to 01.08.2021.

This certificate is issued subject to the conditions stipulated hereunder:

- i) Tests, Examinations and Inspections shall be carried out in accordance with the provisions of the Act and Rules made there under.
- ii) Tests, Examinations Inspections shall be carried out under the direct supervision of the competent person.
- iii) The Director, Industrial Safety and Health, Chennai - 32 reserves the right to revoke or amend this order at anytime during its validity period in accordance with the provisions under Sub-rule (4) of Rule 2-A of the Tamil Nadu Factories Rules 1950.
- iv) Record of the daily work done by the Competent Person should be maintained in a log book, Incorporating therein the name of the factories, the details of work done, observations made, directions given, etc.,



- v) All the test certificates issued by the Competent Person shall contain the latest No. and date of the Certificate of competency issued to a person (or) Institute by this office, along with the validity period of the competency.

The Competent Person shall make an application with all relevant documents for issuance of fresh certificate, if needed, 30 days before the expiry of this certificate.

M. S. Srinivasan
Director,
Industrial Safety and Health,
Chennai- 32.
06/08/18
42
6/8/18

To

Thiru.C.SIVAKUMAR,
Plot No.1148, Anna Nagar West End Colony ✓
Mugappair,
Chennai- 600 050





GOVERNMENT OF TAMIL NADU

DIRECTORATE OF INDUSTRIAL SAFETY AND HEALTH

CHENNAI - 32.

No.H1/12510/2019

Dated: 13.08.2019

CERTIFICATE OF COMPETENCY ISSUED TO A PERSON

(Under Sub-Rule (3) of Rule 2A)

I, **K.Manoharan**, the Director, Industrial Safety and Health in exercise of the powers conferred on me under Section 2 (ca) of the Factories Act and the rules made there under, hereby recognize **Thiru. C.SIVAKUMAR**, Door No.127, Plot No.1148, Anna Nagar West End Colony, Mugappair, Chennai- 600 050. to be the Competent Person for the purpose of carrying out examinations and certification of following item under the Factories Act, 1948 and the Tamilnadu Factories, Rules 1950 in factories located in the state of Tamilnadu.

Section-87 Rule 95 Schedule XVI
Part -II, Para 15

Testing Examination and repair of Plant
and Equipment

This certificate is **valid for Three years from 13.08.2019 to 12.08.2022.**

This certificate is issued subject to the conditions stipulated hereunder:

- i) Tests, Examinations and Inspections shall be carried out in accordance with the provisions of the Act and Rules made there under.
- ii) Tests, Examinations Inspections shall be carried out under the direct supervision of the competent person.



- iii) The Director, Industrial Safety and Health, Chennai - 32 reserves the right to revoke or amend this order at anytime during its validity period in accordance with the provisions under Sub-rule (4) of Rule 2-A of the Tamil Nadu Factories Rules 1950.
- iv) Record of the daily work done by the Competent Person should be maintained in a log book, Incorporating therein the name of the factories, the details of work done, observations made, directions given, etc.,
- v) All the test certificates issued by the Competent Person shall contain the latest No. and date of the Certificate of competency issued to a person (or) Institute by this office, along with the validity period of the competency.

The Competent Person shall make an application with all relevant documents for issuance of fresh certificate, if needed, 30 days before the expiry of this certificate.


Director,
Industrial Safety and Health,
Chennai - 32.

13/10/19

To

Thiru. C.SIVAKUMAR,
Door No.127, Plot No.1148,
Anna Nagar West End Colony, ✓
Mugappair,
Chennai- 600 050.





GOVERNMENT OF TAMIL NADU

OFFICE OF THE DIRECTOR, INDUSTRIAL SAFETY AND HEALTH,
CHENNAI - 32.

No. H1/5737/2021-II

Dated:07.04.2021

CERTIFICATE OF COMPETENCY ISSUED TO AN INSTITUTION

(Under Sub-Rule (3) of Rule 2A)

I, **M.V.Senthilkumar** the Director (FAC), Industrial Safety and Health In exercise of the powers conferred on me under Section 2 (ca) of the Factories Act and the rules made there under, hereby recognize the Institution **Ensafe Technologies, 18/166A, Sugavaneswara Road, Balaji Nagar, Fairlands, Salem – 636 004** to be the Competent Person for the purpose under the Factories Act, 1948 and the Tamil Nadu Factories Rule 1950.

The Following Persons working in the above Institution is hereby authorized to carryout examination & issue the test Certificates against the following items.

THIRU.N.VIJAYAKUMAR

- | | |
|------------------------|------------------------------------|
| 1. Section- 28 Rule 55 | Lifts & Hoists |
| 2. Section-29 Rule 55A | Lifting Machines & Lifting Tackles |
| 3. Rule 61-A | Safety Belts |

THIRU.K.MOHAN

- | | |
|--|---------------|
| 1. Section- 21(2) Rule 53 Schedule VIII | Power Press |
| 2. Section-21 (2) Rule 53(1) Schedule XI | Conveyors |
| 3. Section-87 Rule 95 Schedule VIII | Shot Blasting |

This certificate is valid for **One year from 07.04.2021 to 06.04.2022.**

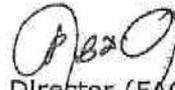
This certificate is issued subject to the conditions stipulated hereunder:

- i) Tests, Examinations and Inspections shall be carried out in accordance with the provisions of the Act and Rules made there under.
- ii) Tests, Examinations Inspections shall be carried out under the direct supervision of the competent person.



- iii) The Director, Industrial Safety and Health, Chennai - 32 reserves the right to revoke or amend this order at anytime during its validity period in accordance with the provisions under Sub-rule (4) of Rule 2-A of the Tamil Nadu Factories Rules 1950.
- iv) Record of the daily work done by the Competent Person should be maintained in a log book, Incorporating therein the name of the factories, the details of work done, observations made, directions given, etc.,
- v) All the test certificates issued by the Competent Person shall contain the latest No. and date of the Certificate of competency issued to a person (or) Institute by this office, along with the validity period of the competency.

The Competent Person shall make an application with all relevant documents for Issuance of fresh certificate, if needed 30 days before the expiry of this certificate.


Director (FAC),
Industrial Safety and Health,
Chennai -32.
08/04/2021
8/4/2021

To
The Manager,
Ensafe Technologies,
18/166A, Sugavaneswara Road ✓
Balaji Nagar, Fairlands,
Salem - 636 004.



ANNEXURE-J (COLLY.) புதுவகுச்சல் - இயக்குநர் அலுவலகம்.கடலூர்

தொழிலக பாதுகாப்பு மற்றும் சுகாதார இணை இயக்குநர் அலுவலகம்.கடலூர்

அனுப்புநர்

திரு.ரெ.சித்தார்த்தன்,எம்.இ.,எம்.பி.ஏ.,டி.ஐ.எச்.,
இணை இயக்குநர்,
தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம்,
கடலூர்.(மு.கூ.பொ)

பெறுநர்

Thiru.S.RameshPrabakaran,(Age53)
S/O. Senthur Pandiyan,
Occupier
Crimsun Organics Private Limited,
Plot No.C9, C10,C11,
Sipcot Industrial Complex,
Kudikadu Village,
Cuddalore District.

எண்.இ/ 908/2021 நாள்:08.06.2021

ஐயா,

பொருள்: தொழிற்சாலைகள் சட்டம் 1948 (திருத்திய சட்டம் 1987) மற்றும் தமிழ்நாடு தொழிற்சாலைகள் விதிகள் 1950 மற்றும் இதர சட்டங்கள் - விபத்து - கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண்.C9, C10,C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் (பதிவு எண் CDR01044) என்ற இத்தொழிற்சாலையில் 13.05.2021 அன்று ஏற்பட்ட விபத்தில்4 தொழிலாளர்கள் மரணமடைந்தது மற்றும் 12 தொழிலாளர்கள் காயமடைந்தது - சில வழிவகைகளின் முரண்பாடுகள் காணப்பட்டது - உரிமையாளர் (Occupier) திரு.S.ரமேஷ் பிரபாகரன் என்பவருக்கு காரணம் கோரும் அறிக்கை - வழங்கப்படுகிறது.

பார்வை: இவ்வலுவலக ஆய்வறிக்கை சுருக்கம் CDR 01044 நாள்: 08.06.2021

தங்கள் தொழிற்சாலையை 13.05.2021 அன்று ஆய்வு செய்த போது கண்டறியப்பட்ட சட்ட மீறுதல்கள் மற்றும் பார்வையில் காணும் இவ்வலுவலக ஆய்வறிக்கை இனங்கள் 01 முதல் 09 வரையிலான காரணங்களுக்கு இக்கடிதம் கிடைத்த 7 நாட்களுக்குள் எழுத்து மூலம் பதில் அனுப்பும்படி கேட்டுக் கொள்ளப்படுகிறது. குறிப்பிட்ட கால வரைக்குள் தங்களிடமிருந்து மறுமொழி ஏதும் வரப்பெறவில்லை எனில் அளிக்கத்தக்க காரணம் / விளக்கம் ஏதும் இல்லை எனக் கருதி மேற்கொண்டு அறிவிப்பு ஏதுமின்றி தங்கள் மீது தக்க நடவடிக்கை தொடரப்படும் என்று தெரிவிக்கப்படுகிறது.

இணை இயக்குநர்,
தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம்,
கடலூர்.(மு.கூ.பொ)

தொழிலக பாதுகாப்பு மற்றும் சுகாதார இணை இயக்குநர் அலுவலகம்,கடலூர்

அனுப்புநர்

திரு.ரெ.சித்தார்த்தன்,எம்.இ.,எம்.பி.ஏ.,டி.ஐ.எச்.,
இணை இயக்குநர்,
தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம்,
கடலூர்.(மு.கூ.பொ)

பெறுநர்

Thiru.S.RameshPrabakaran,(Age53)
S/O. Senthur Pandiyan,
Occupier
Crimsun Organics Private Limited,
Plot No.C9, C10,C11,
Sipcot Industrial Complex,
Kudikadu Village,
Cuddalore District.

எண்.CDR.01044/2021 நாள்:08.06.2021

ஐயா,

பொருள்: தொழிற்சாலைகள் சட்டம் 1948 மற்றும் விதிகள் 1950 மற்றும் இதர சட்டங்கள் - விபத்து - கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண்.C9, C10,C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் (பதிவு எண் CDR01044) என்ற இத்தொழிற்சாலையில் 13.05.2021 அன்று ஏற்பட்ட விபத்தில் 4 தொழிலாளர்கள் மரணமடைந்தது மற்றும் 12 தொழிலாளர்கள் காயமடைந்தது - ஆய்வறிக்கை சுருக்கம் அனுப்புதல் - தொடர்பாக.

பார்வை: எனது ஆய்வு நாள்: 13.05.2021.

எனது ஆய்வின் போது காணப்பட்ட தொழிற்சாலைகளின் சட்டம் மற்றும் இதர சட்டங்களின் மீதான முரண்பாடுகளுக்கு ஆய்வறிக்கை சுருக்கம் இத்துடன் அனுப்பப்படுகிறது.

இணை இயக்குநர்,
தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம்,
கடலூர்.(மு.கூ.பொ)

தொழிற்சாலைகள் சட்டம் 1948 (உடன் திருத்தப்பட்ட தொழிற்சாலைகள் சட்டம் 1987)
மற்றும் தமிழ்நாடு தொழிற்சாலைகள் விதிகள் 1950 மற்றும் இதர சட்டங்கள் மற்றும்
விதிகள்

1. பிரிவு 7A, பிரிவு 87 விதி 95 அட்டவணை XVI பகுதி III இனம் 6 மற்றும் பிரிவு 41

விதி 61 E&F:

கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண். C9, C10, C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் என்ற இத் தொழிற்சாலை, தொழிற்சாலைகள் சட்டம் 1948-ன் கீழ் பதிவு செய்யப்பட்ட தொழிற்சாலையாகும் இதன் பதிவு எண். CDR 01044. இத் தொழிற்சாலைக்கு 2021 ஆம் ஆண்டிற்கு அதிகப்பட்சம் 250 தொழிலாளர்களுடன் 1573 குதிரை திறனுக்கு உரிமம் பெற்று Fibronil Technical, Acetamiprid Technical, Fluroxy pyr Technical ஆகிய பூச்சிகொல்லி மருந்துகள்மொத்தமாக (Bulk drug) உற்பத்தி செய்யப்பட்டு வருகிறது

இந்நிலையில் Acetamiprid உற்பத்தி செய்த பின்னர் மீதமுள்ள Acetamiprid Filterate M.L கலவையை (traces of Isopropyl Alcohol + traces of Acetamiprid + traces of CPMMA + impurities) வெளியேற்றுவதற்கு முன்னர் அதில் கரைந்துள்ள Isopropyl Alcohol என்ற Solvent-ஐ பிரித்தெடுக்க மேற்கண்ட கலவையை, இரண்டாம் தளத்தில் உள்ள உலை Reactor Vessel எண்.108-ல் செலுத்தப்பட்டு இவ்வுலையில் நீராவி (steam) செலுத்தப்பட்டு, Isopropyl Alcohol வடித்தல் (Distillation) முறையில் திரவமாக பிரித்தெடுக்கப்படுகிறது.12.05.2021 அன்று மேற்படி வடித்தல் முறையில் Isopropyl Alcohol பிரிக்கப்பட்டு, அதிக வெப்பநிலையில் இருக்கும் மீதமுள்ள residue (traces of Isopropyl Alcohol + traces of CPMMA + traces of Acetamiprid + impurities) குளிர்ந்த பின்னர், மறுநாள் டிரம்மில் நிரப்பும் பொருட்டு உலையிலேயே சேமித்து வைக்கப்பட்டுள்ளது. 13.05.2021 அன்று காலை மேற்படி உலையில் செலுத்தப்பட்ட நீராவியானது முழுவதுமாக நிறுத்தப்படாத நிலையில்தொடர் வெப்பம் காரணமாக residual-ஆக இருந்த Isopropyl Alcohol, CPMMA மற்றும் Acetamiprid ஆகியவை ஆவியானதால் அதிக அழுத்தம் ஏற்பட்டுள்ளது. மேலும் உலையின் man-hole சரிவர மூடப்படாமல் இருந்துள்ளதால், மேற்படி ஆவி நிலையில் இருந்த இரசாயன கலவை சுமார் 7.40 மணியளவில் அழுத்தம் காரணமாக சத்தத்துடன் உலையின் man-hole-ஐ உடைத்துக் கொண்டு வெளியேறி தீப்பற்றி புகை சூழ்ந்துள்ளது. உடனடியாக தீயணைப்பு துறையினரின் உதவியுடன் தீ கட்டுக்குள் கொண்டு வரப்பட்டுள்ளது. எனினும், இந்த நச்சுப் புகை (fumes) வெளியேறியதன் காரணமாக அதனை சுவாசித்த முதல், இரண்டாம் மற்றும் மூன்றாம் தளத்தில் பணிபுரிந்து கொண்டிருந்த 16 தொழிலாளர்களுக்கு மூச்சுத் திணறல் ஏற்பட்டு அவர்கள் கடலூர் அரசு மருத்துவமனையில் சிகிச்சைக்காக அனுமதிக்கப்பட்டு அதில்கீழ்க்காணும் நான்கு தொழிலாளர்கள் மரணமடைந்தள்ளனர்.

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| 1. | திரு.ராஜ்குமார், (வயது-42) த/பெ.திரு.ராஜேந்திரன், பழையவண்டிப்பாளையம், கடலூர், |
| 2. | திரு.கணபதி, (வயது-25) த/பெ.திரு.கருணாகரன், செம்மங்குப்பம், கடலூர். |
| 3. | திருமதி.சவிதா, (வயது-35) க/பெ.திரு.செந்தில்குமார், அங்காளம்மன் கோயில் தெரு, காரைக்காடு. |
| 4. | திரு.விஜேஷ்ராஜ், (வயது-25) த/பெ.திரு.விஜயகுமார்,எண்.88, எத்திராஜ் நகர், வண்ணாரப்பாளையம், பரங்கிப்பேட்டை, கடலூர். |

மற்றும் 11 தொழிலாளர்கள் கடலூர் அரசு மருத்துவமனையிலும், ஒரு தொழிலாளர் பாண்டிச்சேரியில் உள்ள மகாத்மா காந்தி மருத்துவமனையிலும் சிகிச்சை முடிந்து திரும்பியுள்ளனர்.

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| 1. | திரு. ஹரிகரன், (வயது- 23) த/பெ. திரு. முத்துமுருகன், நம்பர் 26 வார்டு, தேவர் நகர், சின்னமனூர், தேனி. |
| 2. | திரு. ராஜ், (வயது- 29) த/பெ. திரு. மாயவேல், நம்பர் 50 வார்டு, மாரியம்மன்கோயில்தெரு, சுப்பிரமணியபுரம், கடலூர் |
| 3. | திரு. வினோத்குமார், (வயது- 25) த/பெ. திரு.தமிழ்மணி, 684/47, முத்து மாரியம்மன்கோயில்தெரு, பாதிரிகுப்பம், கடலூர் |
| 4. | திரு.மணிகண்டன், (வயது- 31) த/பெ. திரு. ராஜேந்திரன், 650/3, மாரியம்மன்கோயில்தெரு, வடக்குமேலூர், குறிஞ்சிப்பாடி. |
| 5. | திரு.ஜவஹர்லால்கௌவரி ராஜன், (வயது-29) த/பெ. திரு.சேசாசலம், 775, மெயின் ரோடுபத்திரகோட்டை அஞ்சல், பண்டூட்டி. |
| 6. | திரு.சபரி, (வயது- 21) த/பெ. திரு. சேகர், 5/135, குலாவர் தெரு, சுவத் வளவல்லான் தெரு, தூத்துக்குடி. |
| 7. | திரு.ராம்குமார், (வயது- 22) த/பெ. திரு. பழனியப்பன், நம்பர் 23, மோகன்சிங் தெரு, கடலூர். |
| 8. | திரு.சத்தியமூர்த்தி, (வயது- 30) த/பெ. திரு. லட்சுமணன், 51, மாரியம்மன்கோயில்தெரு, அன்னவல்லி. |
| 9. | திரு.சதீஷ்குமார், (வயது- 27) த/பெ. திரு. பூராசாமி, 996, வடக்குதெரு, மஞ்சக்குழி அஞ்சல், சிதம்பரம், கடலூர். |
| 10. | திருமதி. செல்வி, (வயது- 42) க/பெ. திரு.திரிசங்கு, அங்காளம்மன் கோயில்தெரு, காரைக்காடு, சிப்காட், கடலூர். |
| 11. | திருமதி. குணசுந்தரி, (வயது- 49)க/பெ. திரு.முருகானந்தம்,26, வடக்குதெரு, கேப்பார் குவாரி அஞ்சல், பெரியகாரைக்காடு, காரைக்காடு, கடலூர். |
| 12. | திரு. விக்னேஷ், (வயது- 25) த/பெ. திரு. செல்வராசு, காளியம்மன் கோயில்தெரு, சுப்பம்மாள் சத்திரம், ஆண்டார்முள்ளிப்பள்ளம், கடலூர். |

இவ்விபத்து இத்தொழிற்சாலையில் காணப்படும் கீழ்க்காணும் பாதுகாப்பற்ற முறையில் நிறுவப்பட்டு பாதுகாப்பற்ற முறையில் Reactor Vessel 108 பயன்படுத்தப்பட்டதால் விபத்து ஏற்பட்டு நான்கு தொழிலாளர்கள் மரணமடைந்துள்ளனர், 12 தொழிலாளர்கள் உடலுக்கு தீங்கு ஏற்பட்டுள்ளது.

1. Reactor Vessel-ல் எதிர்பாராத விதமாக வெப்பம், அழுத்தம் போன்ற காரணிகள் நிர்ணயிக்கப்பட்ட அளவைவிட அதிகரிக்கும்பொழுது அழுத்தத்தை வெளியேற்ற Safety Valve அமைக்கப்பட்டு அதில் இருந்து வெளியேறும் வாயுக்கள் பரவி தொழிலாளர்களுக்கு ஆபத்து ஏற்படா வண்ணம் உரிய அளவில் (Designed for Required Capacity) வடிவமைக்கப்பட்டு Scrubber System-த்துடன் இணைக்கப்பட்டிருக்கவில்லை.
2. Steam Line-ல் இருந்து Reactor-108-க்கு செல்லும் முன்னர் Steam Line மூடப்பட்ட பின்னரும் Leak காரணமாக வரும் நீராவி Rector Vessel-க்கு செல்லா வண்ணம் பாதுகாப்பாக வெளியேற்றுவதற்கு உரிய Double Valve அமைக்கப்பட்டு நடுவில் Bleeder Valve அமைக்கப்பட்டிருக்கவில்லை.
3. நிர்ணயிக்கப்பட்ட வெப்பத்திற்கு மாறாக வெப்பம் அதிகரிக்கும் பொழுது Reactor-108 உள்ளே இருக்கும் Acetamiprind Filtarate M.L. ஆகிய வேதிப்பொருட்கள் Decompose ஆகி அதிக அழுத்தம் ஏற்படுவதை தடுக்க உடன் வெப்பம் குறைக்க ஏதுவாக Steam Line-ஐ நிறுத்தம் செய்து cooling water செலுத்தப்பட்டு குளிர்விக்கப்பட்டிருக்கவில்லை.

4. Acetempiridd Fillatate ML-ல் இருந்து எளிதில் தீப்பற்ற கூடிய Solvent Isopropyl Alcohol (IPA) முழுவதுமாக Reactor-108-ல் இருந்து பிரித்தெடுக்கப்படாமல் நிர்ணயிக்கப்பட்ட அளவைவிட அதிக அளவில் Residual IPA இருந்ததால் Steamline Leak காரணமாக Reactor 108-ல் வெப்பம் அதிகரித்ததால் ஏற்பட்ட அதிக அழுத்தம் காரணமாக Reactor 108ல் பெருத்தப்பட்டிருந்த Manhole, Reactor 108ல் இருந்து உடைத்து கொண்டு நச்சு புகை Chemical Toxic Fumes வெளியேறி உள்ளது.

இது பிரிவு 7A, பிரிவு 87 விதி 95 அட்டவணை XVI பகுதி III இனம் 6 மற்றும் பிரிவு 41 விதி 61 E & F படி முரண்பாடாகும்.

2. பிரிவு 87 விதி 95 அட்டவணை XVI பகுதி (II) பாரா-7

கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண். C9, C10, C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் (பதிவு எண் CDR01044) என்ற இத்தொழிற்சாலையில் அமைக்கப்பட்டுள்ள கருவிகள் மற்றும் பாதுகாப்பு உபகரணங்கள் (Instruments and Safety devices) சென்னை, தொழிலக பாதுகாப்பு மற்றும் சுகாதார இயக்குநர் அவர்களால் அங்கீகரிக்கப்பட்ட தகுதிவாய்ந்த (Competent person) நபரால் மாதம் ஒருமுறை சோதனை செய்யப்பட்டு, சோதனை விபரங்கள் பதிவேடுகளில் குறிக்கப்பட்டு பராமரிக்கப்பட்டிருக்கவில்லை.

இது பிரிவு 87 விதி 95 அட்டவணை XVI பகுதி (II) பாரா-7-படி முரண்பாடாகும்.

3. பிரிவு 87 விதி 95 அட்டவணை XVI பகுதி (II) பாரா 15

கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண். C9, C10, C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் (பதிவு எண் CDR01044) என்ற இத்தொழிற்சாலையில் அமைக்கப்பட்டுள்ள கெமிக்கல் Process-ன் போது ஆபத்து விளைவிக்க ஏதுவாக உள்ள அனைத்து Plant, Equipment and Machinery முழுவதும் Process தொடங்குவதற்கு முன்னர் மற்றும் இரண்டு வருடங்களுக்கு ஒருமுறை சென்னை, தொழிலக பாதுகாப்பு மற்றும் சுகாதார இயக்குநர் அவர்களால் அங்கீகரிக்கப்பட்ட தகுதி வாய்ந்த நபரால் (Competent Person) உரிய முறையில் சோதனை செய்யப்பட்டிருக்கவில்லை. மேலும், பழுது காரணமாக (Failure) மிகவும் ஆபத்து விளைவிக்கக்கூடிய Plant, Equipments and Machinery மாதம் ஒருமுறை சோதனை செய்யப்பட்டு சோதனை விபரங்கள் பதிவேடுகளில் குறிக்கப்பட்டு ஆய்விற்கு காண்பிக்கப்பட்டிருக்கவில்லை.

இது பிரிவு 87 விதி 95 அட்டவணை XVI பகுதி (II) பாரா 15-படி முரண்பாடாகும்.

4.பிரிவு 87 விதி 95 அட்டவணை XVI பகுதி (II) பாரா 23

கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண்.C9,C10,C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் (பதிவு எண் CDR01044) என்ற இத்தொழிற்சாலையில் Process நடைபெறும் பொழுது மற்றும் பராமரிப்பு பணிகள் மற்றும் சரிசெய்தல் (Repair) போது நிகழ வாய்ப்பு உள்ள அவசர நிலைகளை (Possible Emergencies) கண்டறியப்பட்டிருக்கவில்லை. அவ்வாறாக கண்டறியப்பட்ட அவசர நிலைகளை எதிர்கொள்ள தேவையான பாதுகாப்பு திட்டம் தயாரிக்கப்பட்டு இயக்குநர், தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம் அவர்களுக்கு வழங்கப்படவில்லை. மற்றும் மூன்று மாதங்களுக்கு ஒருமுறை அவசரகால வழிமுறைகள் (Emergencies procedure) ஒத்திகை (Rehearsal) மேற்கொள்ளப்பட்டு குறை நிறைகள் பொருத்தமாக சரி செய்யப்பட்டிருக்கவில்லை.

இதுபிரிவு 87 விதி 95 அட்டவணை XVI பகுதி (II) பாரா 23-படி முரண்பாடாகும்.

5.பிரிவு 41 விதி 61M

கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண்.C9,C10,C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் (பதிவு எண் CDR01044) என்ற இத்தொழிற்சாலையில் பாதுகாப்பு குழு (Safety Committee), இவ்விதியில் கொடுக்கப்பட்டுள்ளவாறு அமைக்கப்பட்டு அதன் செயல்பாடுகள் மற்றும் கடமைகள் (Functions and Duties) துணை விதி 7-ல் கொடுக்கப்பட்டுள்ளவாறு நடைபெற்றிருக்கவில்லை.

இதுபிரிவு 41 விதி 61M-படி முரண்பாடாகும்.

6. பிரிவு 7A (3) பிரிவு 41 B(2) மற்றும் பிரிவு 112

கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண்.C9,C10,C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் (பதிவு எண் CDR01044) என்ற இத்தொழிற்சாலையின் சுகாதாரம் மற்றும் பாதுகாப்பு கொள்கை (Health and Safety Policy) துணைவிதி 4 மற்றும் 5-ல் கொடுக்கப்பட்டுள்ளவாறு தயாரிக்கப்பட்டிருக்கவில்லை. மேலும், அதன் நகல் இணைஇயக்குநர்,வ தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம், கடலூர் மற்றும் இயக்குநர்,தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம், சென்னை அவர்களுக்கு சமர்ப்பிக்கப்பட்டிருக்கவில்லை.

இதுபிரிவு 7A (3) பிரிவு 41 B(2) மற்றும் பிரிவு 112 படி முரண்பாடாகும்.

7. பிரிவு 7A (3) பிரிவு 41 B(2) மற்றும் பிரிவு 112 விதி 62-O(C)

கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண்.C9,C10,C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் (பதிவு எண் CDR01044) என்ற இத்தொழிற்சாலையில் 200க்கு மேற்பட்ட தொழிலாளர்கள் பணிபுரிவதால் உரிய கல்வி தகுதியுடைய முழுநேர மருத்துவ அலுவலருடன் கூடிய இரண்டு அறைகள் கொண்ட 15 சதுர மீட்டர் அளவுடைய தொழில்வழி சுகாதார மையம் (Occupational Health Centre) அமைக்கப்பட்டு, ஒரு செவிலியர், ஒரு டிரஸ்ஸர் கம் கம்பவுண்டர், ஒரு சுத்தம் செய்பவர் மற்றும் வார்டு பாய் நியமிக்கப்பட்டிருக்கவில்லை.

இது 7A (3) பிரிவு 41 B(2) மற்றும் பிரிவு 112 விதி 62-O(C) படி முரண்பாடாகும்.

8. பிரிவு 41 B (4)

கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண்.C9, C10,C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் (பதிவு எண் CDR01044) என்ற இத்தொழிற்சாலைக்கு அகவளாக அவசர கால திட்டம் மற்றும் விரிவான பேரிடர் தடுப்பு முறை (Onsite Emergency and detailed disaster control measures) தயார் செய்யப்பட்டு பணிபுரியும் தொழிலாளர்கள் அனைவருக்கு தெரிவிக்கப்பட்டிருக்கவில்லை மற்றும் அருகில் வசிக்கும் பொதுமக்களுக்கு விபத்தின்போது மேற்கொள்ளப்பட வேண்டிய நடவடிக்கை குறித்த விபரம் தெரிவிக்கப்பட்டிருக்கவில்லை.

இது பிரிவு 41 B (4) படி முரண்பாடாகும்.

9. பிரிவு 7 (A) பிரிவு 41 A விதி 62 M

கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண்.C9,C10,C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் (பதிவு எண் CDR01044) என்ற இத்தொழிற்சாலையில் இடர் தரும் (Hazardous process)-ல் பணிபுரியும் தொழிலாளர்களின் உடல் நலம், தொழிற்சாலை மருத்துவ அலுவலரால் (Factory Medical Officer) பரிசோதனை செய்யப்பட்டு பணிக்கு சேரும்பொழுதும் மற்றும் ஒவ்வொரு ஆறுமாதங்களுக்கு ஒருமுறையும் உடல் தகுதி தொழில் வழி உடல்நலகுறைவு (Occupational Health Hazardous) ஏதும் உள்ளதா என சோதனை செய்யப்பட்ட Pre employment மற்றும் Periodical Examinations குறித்த பதிவேடுகள் படிவம் 39 மற்றும் 17-ல் பராமரிக்கப்பட்டிருக்கவில்லை.

இது பிரிவு 7 (A) பிரிவு 41 A விதி 62 M படி முரண்பாடாகும்

இணை இயக்குநர்,
தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம்,
கடலூர்.(மு.கூ.பொ)

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Office of the Joint Director of Industrial Safety and Health, Cuddalore.

From

Mr. R. Siddharthan, ME,MBA, DIH.,
Joint Director,
Industrial Safety and Health,
Cuddalore.

To

Mr.S.Ramesh Prabakaran,(Age53)
S/o.Senthur Pandian,
Occupier,
Crimsun Organics Private Limited,
Plot No.C9, C10,011,
Sipcot Industrial Complex,
Kudikadu Village,
Cuddalore District.

No:E/908/2021 Date: 08-06-2021

Dear Sir,

Sub: Factories Act, 1948 (Amendment Act, 1987) and Tamil Nadu Factories Rules 1950 and other Acts – Accident- The accident that took place on 13-05-2021 at M/s. crimson Organic Pvt. Ltd, set up in the SIPCOT Industrial Estate, Plot No: C9,C10 & C11, Kudikadu Village, Cuddalore District, [Registration No:CDR01044], in which 4 people lost their life and 12 employees were injured. On inspection, it was found that there were certain lapses in following the safety measures. Notice has been issued to the owner(occupier), Mr. S.Ramesh Prabakaran asking for the lapse/ shortcomings.

Ref: Summary of Inspection Report CDR 01044 Dated: 08.06.2021

On inspecting the factory on 13-05-2021, we found that, there were certain violation of law and in the inspection report that was submitted has items No: 1 to 6, we request you to reply us in writing within 7 days of receiving this notice. In case if you fail to respond or reply within the stipulated time, we would assume that you do not have any valid answers / explanations and will take appropriate action without giving any further notice

sd// 08-06-2021

Joint Director, Industrial Safety and Health
Cuddalore.

Office of the Joint Director of Industrial Safety and Health, Cuddalore.

From

Mr. R. Siddhartha, ME,MBA, DIH.,
Joint Director,
Industrial Safety and Health,
Cuddalore. (M.C.E.)

To

Mr.S.Ramesh Prabakaran,(Age53)
S/o.Senthur Pandian,
Occupier,
Crimsun Organics Private Limited,
Plot No.C9, C10,011,
Sipcot Industrial Complex,
Kudikadu Village,
Cuddalore District

No: CDR 01044 Dated: 08.06.2021

Dear Sir,

Sub: Factories Act, 1948 and Factories Rules 1950 and other Acts – Accident- The accident that took place on 13-05-2021 at M/s. crimson Organic Pvt. Ltd, set up in the SIPCOT Industrial Estate, Plot No: C9,C10 & C11, Kudikadu Village, Cuddalore District, [Registration No:CDR01044], in which 4 people lost their life and 12 employees were injured. Sending herewith the Inspection Report Summary – regarding

Ref: My Inspection conducted date: 13-05-2021

When I inspected the factory, I found certain violations of law and other conditions. I am sending herewith the inspection report summary.

sd// 08-06-2021

Joint Director, Industrial Safety and Health
Cuddalore.

**Factories Act, 1948 (with Factories Amendment Act, 1987) and Tamil Nadu
Factories Rules 1950 and other Acts and Rules**

**1. Section 7A Section 87 Rule 95 Schedule XVI Part III Item 6 and Section 41
Rule 61 E &F:**

M/s. crimson Organic Pvt. Ltd, set up in the SIPCOT Industrial Estate, Plot No: C9,C10 & C11, Kudikadu Village, Cuddalore District, was registered under the Factories Act, 1948 and its Registration No is CDR01044. For the year 2021, this industry has been given license to operate with the maximum manpower limit of 260 employees and 1573 hp (horsepower) and the it is manufacturing pesticides such as Fibronil Technical, Acetamiprid Technical, Fluroxy pyr Technical on bulk basis (bulk drugs)

The residue from the product Acetamiprid is Acetamiprid Filterate M.L mixture (traces of Isopropyl Alcohol + traces of Acetamiprid + traces of CPMMA + impurities). Before disposing this residue, the Isopropyl Alcohol solvent that is mixed in this product, is first separated from the residue. To separate this, this mixture is taken to the second floor and poured in to the boiler Reactor Vessel No.:108 and it is steamed and then Isopropyl Alcohol is separated through Distillation process. On 12.05-2021, after Isopropyl Alcohol was separated, balance residue (traces of Isopropyl Alcohol + traces of CPMMA + traces of Acetamiprid + impurities) which was in the high temperature was kept in the boiler to cool down and to be collected in the drum the next day. On 13-05-2021, as the steaming process from the boiler not stoped which lead to high temperature, due to which the residue such as Isopropyl Alcohol, CPMMA and Acetamiprid were converted in to very high pressure vapour. The manhole in the boiler was not closed properly, and the vapor pressure formed by the chemical mixture led to a huge blast to the manhole of the boiler which in turn lead to smoke and fire accident at around 7.30 am at the factory premises. Immediately the fire was got under control with the help fire engine and staff of the Fire Engine Department. 16 employees who were in the first, second, third floor of the factory were caught in the accident and could not

breathe in the fumes. They were admitted at Government General Hospital, Cuddalore and of them 4 lost their life .

| | |
|---|---|
| 1 | Mr. Rajkumar, (Age-42) S/o. Mr. Rajendran, Old Vandipalayam, Cuddalore, |
| 2 | Mr. Ganapathi, (Age-25) S/o. Thiru Karunakaran, Semmankuppam, Cuddalore. |
| 3 | Mrs. Savita (Age-35) W/o. Mr. Senthilkumar, Angalamman Temple Street, Karaikadu. |
| 4 | Mr. Wijeshraj, (Age-25) S/o. Mr. Vijayakumar, No.88, Ethiraj Nagar, Vannarapalayam, Parangipettai, Cuddalore. |

11 Employees were admitted at Cuddalore Government Hospital one was admitted at Mahathma Gandhi Hospital in Pondichey and they returned home from the hospital

| | |
|----|---|
| 1 | Mr. Harikaran, (Age- 23) S/o. Mr. Muthu Murugan, No.26 Ward, Devar Nagar, Chinnamanur, Theni. |
| 2 | Mr. Raj, (Age-29) S/o. Mr. Mayavel, No.50 Ward, Mariamman koil Street, Subramaniapuram, Cuddalore |
| 3 | Mr. Vinod Kumar, (Age-25) S/o. Mr. Tamilmani, 684/47, Muthu Mariamman koil Street, Pathirikuppam, Cuddalore 4. |
| 4 | Mr. Manikandan, (Age-31) S/o. Mr. Rajendran, 650/3, Mariamman koil Street, North Melur, Kurinjipadi. |
| 5 | Mr. Jawaharlal Gowri Rajan, (Age-29) S/o. Mr. Sesasalam, 775, Main Road badrakottai Post, Panruti. |
| 6 | Mr. Sabari, (Age-21) S/o. Mr. Sekar, 5/135, Gulalar Street, South Valavallan Street, Thoothukudi. |
| 7 | Mr. Ramkumar, (age 22) S/o. Mr. Palaniappan, No.23, Mohan Singh Street, Cuddalore. |
| 8 | Mr. Sathyamoorthy, (Age- 30) S/o. Mr. Lakshmanan, 51, Mariamman koil Street, Annavalli. |
| 9 | Mr. Satish Kumar, (Age 27) S/o. Mr. Poorasamy, 996, North Street, Manjakkuzhi Post, Chidambaram, Cuddalore. 10. |
| 10 | Mrs.Selvi, (Age- 42) W/o. Mr. Thirisanku, Angalamman koil Street, Karaikkadu, Sipcot, Cuddalore, 11. |
| 11 | Mrs. Gunasundari, (Age- 49) W/o. Mr. Muruganantham, 26, North Street, Capper Quarry Post, Periya karaikadu, Karaikadu, Cuddalore. |
| 12 | Mr. Vignesh, (age-25) S/o. Mr. Selvarasu, Kalamman koil Street, Subbammal Chattram, Andarmullipallam, Cuddalore. |

Reactor vessel 108 in the factory has not been installed with the proper safety measures and was used without proper safety precautions due to which 4 people lost their life and 12 were injured

1. In an unexpected circumstances when the heat and pressure are far beyond the prescribed limit, Reactor vessel should have a safety valve which is connected to the scrubber system of a required capacity through a pipeline so that the pressure could be released and it would not endanger life of the employees, was not done.
2. There was a leak in the steam line connected to the Reactor Vessel which could have been stopped from steam going in to the Reactor Vessel, had Double Valvewith and Bleeder valve were installed, but that was not done
3. When the temperature is beyond the prescribe limit, in order to stop the chemical Acetamiprind FiltarateM.L inside the Reactor Vessel from decomposing and forming pressure, the steam line should be disconnected , coolant water should be poured to cool the reactor, even this was not done.
4. Easily flammable Solvent Isopropyl Alcohol (IPA) from Acetemipridd FillatateML , was not completely separated from the Reactor 108 and since Residual IPA was more than the presecribed limit and due to steam leak which lead to high temperature and it created huge pressure in the Reactor 108, which led to the blast through the manhole and due to which chemical toxic fumes were released.

These violations are against the Section 7A, Section 87, Rule 95 Schedule XVI Part III Item and Section 41 Rule 61 E&F

2. Section 87 Rule 95 Schedule XVI Part (II) Paragraph-7

M/s.Crimsun Orgnaics Pvt Ltd (Registration No: CDR 01044) situated at Plot No.C9, C10, 011, SIPCOT Industrial Complex, Kudikadu Village, Cuddalore District, the inspection of the Instruments and Safety Devices were to be checked monthly once by a competent person authorized by The Director, Industrial Safety and Health, whose observations has to be recorded in the register and register is to maintained, which was also not done

These are violations against the section 87, Rule 95 Schedule XVI Part (II), Paragraph-7

3. Section 87 Rule 95 Schedule XVI Part (II) Paragraph 15

M/s.Crimsun Orgnaics Pvt Ltd (Registration No: CDR 01044) situated at Plot No.C9, C10, 011, SIPCOT Industrial Complex, Kudikadu Village, Cuddalore District, the chemical Plant, Equipment and machinery should be inspected before the start of the process every day and once in two years by a competent person approved by the Director, Industry Safety and Health, was also not done. There is no register or record to show that the dangerous Plant, Equipment and machinery due to failure were checked every month and the details were recorded in the register.

These are violations against the section 87, Rule 95 Schedule XVI Part (II), Paragraph-15

4. Section 87 Rule 95 Schedule XVI Part (II), Paragraph-23

M/s.Crimsun Orgnaics Pvt Ltd (Registration No: CDR 01044) situated at Plot No.C9, C10, 011, SIPCOT Industrial Complex, Kudikadu Village, Cuddalore District, there is no record to show that there were any possible emergencies occurred during the processing, maintaining and repairing. They have not submitted any Safety Plan arises out of the identified emergency problems to The Director, Industrial Safety and Health. Once in every three months, a Mock drill of Emergency procedure Rehearsal should be done to identify the shortcomings during the emergency situations, which was also not done.

These violdations are against the sections 87 Rule 95 Schedule XVI Part (II) Paragraphy 23

5. Section 41 Rule 61M

M/s.Crimsun Orgnaics Pvt Ltd (Registration No: CDR 01044) situated at Plot No.C9, C10, 011, SIPCOT Industrial Complex, Kudikadu Village, Cuddalore District, in this factory Safety Committee is not formed according the above rule and the safety committee of the factory did not work according to the functions and duties of the rules falling under sub section 7.

These violations are against the Section 41, Rule 61M

6. Section 7A (3) Section 41 B(2) and Section 112

M/s.Crimsun Orgnaics Pvt Ltd (Registration No: CDR 01044) situated at Plot No.C9, C10, 011, SIPCOT Industrial Complex, Kudikadu Village, Cuddalore District, in this factory Health and Safety Policy was not made according to the guidelines of the rules falling under sub section 4 and 5. The copy of it was not submitted to The Joint Director, Industrial Safety and Health, Cuddalore and The Director, Industrial Safety and health, Chennai.

These are violations against the Section 7A (3) Section 41 B(2) and Section 112

7. Section 7A (3) Section 41 B(2) and Section 112 Rule 62-O(C)

M/s.Crimsun Orgnaics Pvt Ltd (Registration No: CDR 01044) situated at Plot No.C9, C10, 011, SIPCOT Industrial Complex, Kudikadu Village, Cuddalore District, in this factory there are more than 200 employees are working , and it does not have a proper occupational health centre in the premises in an area of 15 sq.mt with 2 rooms , which should also have well qualified medical practitioner, a nursing staff, Dresser cum compounder and one house keeping person and ward boy, which was also not available in the factory premises.

These are violations against the Section 7A (3) Section 41 B(2) and Section 112 Rule 62-O(C)

8. Section 41 B (4)

M/s.Crimsun Orgnaics Pvt Ltd (Registration No: CDR 01044) situated at Plot No.C9, C10, 011, SIPCOT Industrial Complex, Kudikadu Village, Cuddalore District, in this factory the employees were not given training for Onsite emergency and detailed disaster measures and the people in the nearby locality were also not informed about the measures to be taken during emergency

These are violations against the Section 41 B (4)

9. Section 7 (A) Section 41 A Rule 62 M

M/s.Crimsun Orgnaics Pvt Ltd (Registration No: CDR 01044) situated at Plot No.C9, C10, 011, SIPCOT Industrial Complex, Kudikadu Village, Cuddalore District, in this factory the people joining factory in the hazardous process should undergo medical examination while joining the job and once in every 6 months they should undergo occupational health hazardous under the supervision of factory medical officer and accordingly records regarding Pre Employment and

Periodical Examinations should be maintained in form 39 and 17, which was also not done.

These are violations against the Section 7 (A) Section 41 A Rule 62 M

sd// 08-06-2021

Joint Director,

Industrial Safety and Health
Cuddalore. (M.C.E.)

தொழிலக பாதுகாப்பு மற்றும் சுகாதார இணை இயக்குநர் அலுவலகம்,கடலூர்.

அனுப்புநர்

திரு.ரெ.சித்தார்த்தன்,எம்.இ.,எம்.பி.ஏ.,டி.ஐ.எச்.,
இணை இயக்குநர்,
தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம்,
கடலூர்.(மு.கூ.பொ)

பெறுநர்

Thiru.A.Paranitharan,(Age54)
S/O. Alwar,
Manager
Crimsun Organics Private Limited,
Plot No.C9, C10,C11,
Sipcot Industrial Complex,
Kudikadu Village,
Cuddalore District.

எண்.இ/909/2021 நாள்: 08.06.2021

ஐயா,

பொருள்: தொழிற்சாலைகள் சட்டம் 1948 (திருத்திய சட்டம் 1987) மற்றும் தமிழ்நாடு தொழிற்சாலைகள் விதிகள் 1950 மற்றும் இதர சட்டங்கள் - விபத்து - கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண்.C9, C10,C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் (பதிவு எண் CDR01044) என்ற இத்தொழிற்சாலையில் 13.05.2021 அன்று ஏற்பட்ட விபத்தில்4 தொழிலாளர்கள் மரணமடைந்தது மற்றும் 12 தொழிலாளர்கள் காயமடைந்தது சில வழிவகைகளின் முரண்பாடுகள் காணப்பட்டது - மேலாளர் திரு.A.பரணிதரன் என்பவருக்கு காரணம் கோரும் அறிக்கை - வழங்கப்படுகிறது.

பார்வை: இவ்வலுவலக ஆய்வறிக்கை சுருக்கம் CDR 01044 நாள்: 08.06.2021

அன்று தங்கள் தொழிற்சாலையை 13.05.2021 அன்று ஆய்வு செய்த போது கண்டறியப்பட்ட சட்ட மீறுதல்கள் மற்றும் பார்வையில் காணும் இவ்வலுவலக ஆய்வறிக்கை இனங்கள் 1 முதல் 6 வரையிலான காரணங்களுக்கு இக்கடிதம் கிடைத்த 7 நாட்களுக்குள் எழுத்து மூலம் பதில் அனுப்பும்படி கேட்டுக் கொள்ளப்படுகிறது. குறிப்பிட்ட கால வரைக்குள் தங்களிடமிருந்து மறுமொழி ஏதும் வரப்பெறவில்லை எனில் அளிக்கத்தக்க காரணம் / விளக்கம் ஏதும் இல்லை எனக் கருதி மேற்கொண்டு அறிவிப்பு ஏதுமின்றி தங்கள் மீது தக்க நடவடிக்கை தொடரப்படும் என்று தெரிவிக்கப்படுகிறது.

இணைப்பு : ஆய்வறிக்கை சுருக்கம்.

இணை இயக்குநர்,
தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம்,
கடலூர்.(மு.கூ.பொ)

தொழிலக பாதுகாப்பு மற்றும் சுகாதார இணை இயக்குநர் அலுவலகம்,கடலூர்

அனுப்புநர்

திரு.ரெ.சித்தார்த்தன்,எம்.இ.,எம்.பி.ஏ.,டி.ஐ.எச்.,
இணை இயக்குநர்,
தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம்,
கடலூர்.(மு.கூ.பொ)

பெறுநர்

Thiru.A.Paranitharan,(Age54)
S/O. Alwar,
Manager
Crimsun Organics Private Limited,
Plot No.C9, C10,C11,
Sipcot Industrial Complex,
Kudikadu Village,
Cuddalore District.

எண்.CDR.01044/2021 நாள்: 08.06.2021

ஐயா,

பொருள்: தொழிற்சாலைகள் சட்டம் 1948 மற்றும் விதிகள் 1950 மற்றும் இதர சட்டங்கள் - விபத்து - கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண்.C9, C10,C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் (பதிவு எண் CDR01044) என்ற இத்தொழிற்சாலையில் 13.05.2021 அன்று ஏற்பட்ட விபத்தில் 4 தொழிலாளர்கள் மரணமடைந்தது மற்றும் 12 தொழிலாளர்கள் காயமடைந்ததுஆய்வறிக்கை சுருக்கம் அனுப்புதல் - தொடர்பாக.

பார்வை: எனது ஆய்வு நாள்: 13.05.2021.

எனது ஆய்வின் போது காணப்பட்ட தொழிற்சாலைகளின் சட்டம் மற்றும் இதர சட்டங்களின் மீதான முரண்பாடுகளுக்கு ஆய்வறிக்கை சுருக்கம் இத்துடன் அனுப்பப்படுகிறது.

இணை இயக்குநர்,
தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம்,
கடலூர்.(மு.கூ.பொ)

தொழிற்சாலைகள் சட்டம் 1948 (உடன் திருத்தப்பட்ட தொழிற்சாலைகள் சட்டம் 1987)
மற்றும் தமிழ்நாடு தொழிற்சாலைகள் விதிகள் 1950 மற்றும் இதர சட்டங்கள் மற்றும்
விதிகள்

1. 1.பிரிவு 87 விதி 95 அட்டவணை XVI பகுதி III இனம் 6 மற்றும் பிரிவு 41
விதி 61 E & F:

கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண். C9, C10, C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் என்ற இத்தொழிற்சாலை, தொழிற்சாலைகள் சட்டம் 1948-ன் கீழ் பதிவு செய்யப்பட்ட தொழிற்சாலையாகும் இதன் பதிவு எண். CDR 01044. இத்தொழிற்சாலைக்கு 2021 ஆம் ஆண்டிற்கு அதிகபட்சம் 250 தொழிலாளர்களுடன் 1573 குதிரை திறனுக்கு உரிமம் பெற்று Fibronil Technical, Acetamiprid Technical, Fluroxy pyr Technical ஆகிய பூச்சிகொல்லி மருந்துகள் மொத்தமாக (Bulk drug) உற்பத்தி செய்யப்பட்டு வருகிறது.

இந்நிலையில் Acetamiprid உற்பத்தி செய்த பின்னர்மீதமுள்ள Acetamiprid Filterate M.L கலவையை (traces of Isopropyl Alcohol + traces of Acetamiprid + traces of CPMMA + impurities) வெளியேற்றுவதற்கு முன்னர் அதில் கரைந்துள்ள Isopropyl Alcohol என்ற Solvent-ஐ பிரித்தெடுக்க மேற்கண்ட கலவையை, இரண்டாம் தளத்தில் உள்ள உலை Reactor Vessel எண்.108-ல் செலுத்தப்பட்டு இவ்வுலையில் நீராவி (steam) செலுத்தப்பட்டு, Isopropyl Alcohol வடித்தல் (Distillation) முறையில் திரவமாக பிரித்தெடுக்கப்படுகிறது. 12.05.2021 அன்று மேற்படி வடித்தல் முறையில் Isopropyl Alcohol பிரிக்கப்பட்டு, அதிக வெப்பநிலையில் இருக்கும் மீதமுள்ள residue (traces of Isopropyl Alcohol + traces of CPMMA + traces of Acetamiprid + impurities) குளிர்ந்த பின்னர், மறுநாள் டிரம்மில் நிரப்பும் பொருட்டு உலையிலேயே சேமித்து வைக்கப்பட்டுள்ளது. 13.05.2021 அன்று காலை மேற்படி உலையில் செலுத்தப்பட்ட நீராவியானது முழுவதுமாக நிறுத்தப்படாத நிலையில் தொடர் வெப்பம் காரணமாக residual-ஆக இருந்த Isopropyl Alcohol, CPMMA மற்றும் Acetamiprid ஆகியவை ஆவியானதால் அதிக அழுத்தம் ஏற்பட்டுள்ளது. மேலும் உலையின் man-hole சரிவர மூடப்படாமல் இருந்துள்ளதால், மேற்படி ஆவி நிலையில் இருந்த இரசாயன கலவை சுமார் 7.40 மணியளவில் அழுத்தம் காரணமாக சத்தத்துடன் உலையின் man-hole-ஐ உடைத்துக் கொண்டு வெளியேறி தீப்பற்றி புகை சூழ்ந்துள்ளது. உடனடியாக தீயணைப்பு துறையினரின் உதவியுடன் தீ கட்டுக்குள் கொண்டு வரப்பட்டுள்ளது. எனினும், இந்த நச்சுப் புகை (fumes) வெளியேறியதன் காரணமாக அதனை சுவாசித்த முதல், இரண்டாம் மற்றும் மூன்றாம் தளத்தில் பணிபுரிந்து கொண்டிருந்த 16 தொழிலாளர்களுக்கு மூச்சுத் திணறல் ஏற்பட்டு அவர்கள் கடலூர் அரசு மருத்துவமனையில் சிகிச்சைக்காக அனுமதிக்கப்பட்டு அதில் கீழ்காணும் நான்கு தொழிலாளர்கள் மரணமடைந்தள்ளனர்.

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|----|---|
| 1. | திரு.ராஜ்குமார், (வயது-42) த/பெ.திரு.ராஜேந்திரன், பழையவண்டிப்பாளையம், கடலூர். |
| 2. | திரு.கணபதி, (வயது-25) த/பெ.திரு.கருணாகரன், செம்மங்குப்பம், கடலூர். |
| 3. | திருமதி.சவிதா, (வயது-35) க/பெ.திரு.செந்தில்குமார், அங்காளம்மன் கோயில் தெரு, காரைக்காடு. |
| 4. | திரு.விஜேஷ்ராஜ், (வயது-25) த/பெ.திரு.விஜயகுமார், எண்.88, எத்திராஜ் நகர், வண்ணாரப்பாளையம், பரங்கிப்பேட்டை, கடலூர். |

மற்றும் 11 தொழிலாளர்கள் கடலூர் அரசு மருத்துவமனையிலும், ஒரு தொழிலாளர் பாண்டிச்சேரியில் உள்ள மகாத்மா காந்தி மருத்துவமனையிலும் சிகிச்சை முடிந்து திரும்பியுள்ளனர்.

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| 1. | திரு. ஹரிகரன், (வயது- 23) த/பெ. திரு. முத்துமுருகன், நம்பர் 26 வார்டு, தேவர் நகர், சின்மனலூர், தேனி. |
| 2. | திரு. ராஜ், (வயது- 29) த/பெ. திரு. மாயவேல், நம்பர் 50 வார்டு, மாரியம்மன்கோயில்தெரு, சுப்பிரமணியபுரம், கடலூர் |
| 3. | திரு. வினோத்குமார், (வயது- 25) த/பெ. திரு. தமிழ்மணி, 684/47, முத்து மாரியம்மன்கோயில்தெரு, பாதிரிகுப்பம், கடலூர் |
| 4. | திரு. மணிகண்டன், (வயது- 31) த/பெ. திரு. ராஜேந்திரன், 650/3, மாரியம்மன்கோயில்தெரு, வடக்குமேலூர், குறிஞ்சிப்பாடி. |
| 5. | திரு. ஜவஹர்லால் கௌவரி ராஜன், (வயது-29) த/பெ. திரு. சேசாசலம், 775, மெயின் ரோடுபத்திரகோட்டை அஞ்சல், பண்ணாட்டி. |
| 6. | திரு. சபரி, (வயது- 21) த/பெ. திரு. சேகர், 5/135, குலாவர் தெரு, சுவத் வளவல்லான் தெரு, தூத்துக்குடி. |
| 7. | திரு. ராம்குமார், (வயது- 22) த/பெ. திரு. பழனியப்பன், நம்பர் 23, மோகன்சிங் தெரு, கடலூர். |
| 8. | திரு. சத்தியமூர்த்தி, (வயது- 30) த/பெ. திரு. வட்கமணன், 51, மாரியம்மன்கோயில்தெரு, அன்னவல்லி. |
| 9. | திரு. சதீஷ்குமார், (வயது- 27) த/பெ. திரு. பூராசாமி, 996, வடக்குதெரு, மஞ்சக்குழி அஞ்சல், சிதம்பரம், கடலூர். |
| 10. | திருமதி. செல்வி, (வயது- 42) க/பெ. திரு. திரிசங்கு, அங்காளம்மன் கோயில்தெரு, காரைக்காடு, சிப்காட், கடலூர். |
| 11. | திருமதி. குணசுந்தரி, (வயது- 49) க/பெ. திரு. முருகானந்தம், 26, வடக்குதெரு, கேப்பார் குவாரி அஞ்சல், பெரியகாரைக்காடு, காரைக்காடு, கடலூர். |
| 12. | திரு. விக்னேஷ், (வயது- 25) த/பெ. திரு. செல்வராக, காளியம்மன் கோயில்தெரு, சுப்பம்மாள் சத்திரம், ஆண்டார்முள்ளிப்பள்ளம், கடலூர். |

இவ்விபத்து இத்தொழிற்சாலையில் காணப்படும் கீழ்க்காணும் பாதுகாப்பற்ற முறையில் நிறுவப்பட்டு பாதுகாப்பற்ற முறையில் Reactor Vessel 108 பயன்படுத்தப்பட்டதால் விபத்து ஏற்பட்டு நான்கு தொழிலாளர்கள் மரணமடைந்துள்ளனர், 12 தொழிலாளர்கள் உடலுக்கு தீங்கு ஏற்பட்டுள்ளது.

1. Reactor Vessel-ல் எதிர்பாராத விதமாக வெப்பம், அழுத்தம் போன்ற காரணிகள் நிர்ணயிக்கப்பட்ட அளவைவிட அதிகரிக்கும்பொழுது அழுத்தத்தை வெளியேற்ற Safety Valve அமைக்கப்பட்டு அதில் இருந்து வெளியேறும் வாயுக்கள் பரவி தொழிலாளர்களுக்கு ஆபத்து ஏற்படா வண்ணம் உரிய அளவில் Designed for Required Capacity வடிவமைக்கப்பட்டு Scrubber System-த்துடன் இணைக்கப்பட்டிருக்கவில்லை.
2. Steam Line-ல் இருந்து Reactor-108-க்கு செல்லும் முன்னர் Steam Line மூடப்பட்ட பின்னரும் Leak காரணமாக வரும் நீராவி Reactor Vessel-க்கு செல்லா வண்ணம் பாதுகாப்பாக வெளியேற்றுவதற்கு உரிய Double Valvewith அமைக்கப்பட்டு Bleeder Valve அமைக்கப்பட்டிருக்கவில்லை.

3. அதிக வெப்பம் காரணமாக Reactor-108 உள்ள இருக்கும் Acetamiprind FiltarateM.L. ஆகிய வேதிப்பொருட்கள் Decompose ஆகி அதிக அழுத்தம் ஏற்படுவதை தடுக்க உடன் வெப்பம் குறைக்க ஏதுவாக colling water செலுத்தும் Steam Line-ஐநிறுத்திவிட்டு செய்து cooling water செலுத்தப்பட்டு குளிர்விக்கப்பட்டிருக்கவில்லை.
4. Acetemipridd FillatateML-ல் இருந்து எளிதில் தீப்பற்ற கூடிய Solvent Isopropyl Alcohol (IPA) முழுவதுமாக Reactor-108-ல் இருந்து பிரித்தெடுக்கப்படாமல் நிர்ணயிக்கப்பட்ட அளவைவிட அதிக அளவில் Residual IPA இருந்ததால் Steamline Leak காரணமாக Reactor 108-ல் வெப்பம் அதிகரித்ததால் ஏற்பட்ட அதிக அழுத்தம் காரணமாக Rector 108ல் பெருத்தப்பட்டிருந்த Manhole,Rector 108ல் இருந்து உடைத்து கொண்டு நச்சு புகை (Chemical Toxic Fumes) வெளியேறி உள்ளது.

இது பிரிவு 87 விதி 95 அட்டவணை XVI பகுதி III இனம் 6 மற்றும் பிரிவு 41 விதி 61 E & F படி முரண்பாடாகும்.

2. பிரிவு 41 விதி 61M

கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண்.C9,C10,C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் (பதிவு எண் CDR 01044) என்ற இத்தொழிற்சாலையில் பாதுகாப்பு குழு (Safety Committee), இவ்விதியில் கொடுக்கப்பட்டுள்ளவாறு அமைக்கப்பட்டு அதன் செயல்பாடுகள் மற்றும் கடமைகள் (Functions and Duties) துணை விதி 7-ல் கொடுக்கப்பட்டுள்ளவாறு நடைபெற்றிருக்கவில்லை.

இதுபிரிவு 41 விதி 61M-படி முரண்பாடாகும்.

3. பிரிவு 87 விதி 95 அட்டவணை XVI பகுதி (II) பாரா-7

கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண்.C9,C10,C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் (பதிவு எண் CDR01044) என்ற இத்தொழிற்சாலையில் அமைக்கப்பட்டுள்ள கருவிகள் மற்றும் பாதுகாப்பு உபகரணங்கள் (Instruments and Safety devices) சென்னை, தொழிலக பாதுகாப்பு மற்றும் சுகாதார இயக்குநர் அவர்களால் அங்கீகரிக்கப்பட்ட தகுதிவாய்ந்த (Competent person) நபரால் மாதம் ஒருமுறை சோதனை செய்யப்பட்டு, சோதனை விபரங்கள் பதிவேடுகளில் குறிக்கப்பட்டு பராமரிக்கப்பட்டிருக்கவில்லை.

இதுபிரிவு 87 விதி 95 அட்டவணை XVI பகுதி (II) பாரா-7-படி முரண்பாடாகும்.

4. பிரிவு 87 விதி 95 அட்டவணை XVI பகுதி (II) பாரா 15

கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண்.C9,C10,C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் (பதிவு எண் CDR01044) என்ற இத்தொழிற்சாலையில் அமைக்கப்பட்டுள்ள கெமிக்கல் Process-ன் போது ஆபத்து விளைவிக்க ஏதுவாக உள்ள அனைத்து Plant, Equipment and Machinery முழுவதும் Process தொடங்குவதற்கு முன்னர் மற்றும் இரண்டு வருடங்களுக்கு ஒருமுறை சென்னை, தொழிலக பாதுகாப்பு மற்றும் சுகாதார இயக்குநர் அவர்களால் அங்கீகரிக்கப்பட்ட தகுதி வாய்ந்த நபரால் (Competent Person) உரிய முறையில் சோதனை செய்யப்பட்டிருக்கவில்லை. மேலும், பழுது காரணமாக (Failure) மிகவும் ஆபத்து விளைவிக்கக்கூடிய Plant, Equipment Machinery மாதம் ஒருமுறை சோதனை செய்யப்பட்டு சோதனை விபரங்கள் பதிவேடுகளில் குறிக்கப்பட்டு ஆய்விற்கு காண்பிக்கப்பட்டிருக்கவில்லை.

இது பிரிவு 87 விதி 95 அட்டவணை XVI பகுதி (II) பாரா 15-படி முரண்பாடாகும்.

5. 4.பிரிவு 87 விதி 95 அட்டவணை XVI பகுதி (II) பாரா 23

கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண்.C9,C10,C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் (பதிவு எண் CDR01044) என்ற இத்தொழிற்சாலையில் Process நடைபெறும் பொழுது மற்றும் பராமரிப்பு பணிகள் மற்றும் சரிசெய்தல் (Repair) போது நிகழ வாய்ப்பு உள்ள அவசர நிலைகளை (Possible Emergencies) கண்டறியப்பட்டிருக்கவில்லை. அவ்வாறாக கண்டறியப்பட்ட அவசர நிலைகளை எதிர்கொள்ள தேவையான பாதுகாப்பு திட்டம் தயாரிக்கப்பட்டு இயக்குநர், தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம் அவர்களுக்கு வழங்கப்படவில்லை. மற்றும் மூன்று மாதங்களுக்கு ஒருமுறை அவசரகால வழிமுறைகள் (Emergencies procedure) ஒத்திகை (Rehearsal) மேற்கொள்ளப்பட்டு குறை நிறைகள் பொருத்தமாக சரி செய்யப்பட்டிருக்கவில்லை.

இதுபிரிவு 87 விதி 95 அட்டவணை XVI பகுதி (II) பாரா 23-படி முரண்பாடாகும்.

6. பிரிவு 88 விதி 96

கடலூர் மாவட்டம், குடிக்காடு கிராமம், சிப்காட் வளாகம், பிளாட் எண்.C9,C10,C11, என்ற முகவரியில் அமைந்துள்ள கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட் (பதிவு எண் CDR01044) என்ற இத்தொழிற்சாலையில் Acetamiprid உற்பத்தி செய்த பின்னர் மீதமுள்ள Acetamiprid Filterate M.Lகலவையை (traces of Isopropyl Alcohol + traces of Acetamiprid + traces of CPMMA + impurities) வெளியேற்றுவதற்கு முன்னர் அதில் கரைந்துள்ள (Reactor vessel)Isopropyl Alcohol என்ற Solvent-ஐ பிரித்தெடுக்க மேற்கண்ட கலவையை, இரண்டாம் தளத்தில் உள்ள உலை எண்.108-ல் செலுத்தப்பட்டு, இவ்வலையில் நீராவி (steam) செலுத்தப்பட்டு, Isopropyl Alcohol வடித்தல் (Distillation) முறையில் திரவமாக பிரித்தெடுக்கப்படுகிறது. 12.05.2021 அன்று மேற்படி வடித்தல் முறையில் Isopropyl Alcohol பிரிக்கப்பட்டு, அதிக வெப்பநிலையில் இருக்கும் மீதமுள்ள residue (traces of Isopropyl Alcohol + traces of CPMMA + traces of Acetamiprid + impurities) குளிர்ந்த பின்னர், மறுநாள் டிரம்மில் நிரப்பும் பொருட்டு உலையிலேயே சேமித்து வைக்கப்பட்டுள்ளது. 13.05.2021 அன்று காலை சுமார் 7.40 மணியளவில் மேற்படி உலையில் செலுத்தப்பட்ட நீராவியானது முழுவதுமாக நிறுத்தப்படாத நிலையில் தொடர் வெப்பம் காரணமாக residual Isopropyl Alcohol, CPMMA மற்றும் Acetamiprid ஆகியவை ஆவியானதால் அதிக அழுத்தம் ஏற்பட்டுள்ளது. மேலும் உலையின் man-hole சரிவர மூடப்படாமல் இருந்துள்ளதால், மேற்படி ஆவி நிலையில் இருந்த இரசாயன கலவை அழுத்தம் காரணமாக சத்தத்துடன் உலையின் man-hole-ஐ உடைத்துக் கொண்டு வெளியேறி தீப்பற்றி புகை சூழ்ந்தது. உடனடியாக தீயணைப்பு துறையினரின் உதவியுடன் தீ கட்டுக்குள் கொண்டு வரப்பட்டுள்ளது. எனினும், இந்த நச்சுப் புகை (fumes) வெளியேறியதன் காரணமாக அதனை சுவாசித்த முதல், இரண்டாம் மற்றும் மூன்றாம் தளத்தில் பணிபுரிந்து கொண்டிருந்த 16 தொழிலாளர்களுக்கு மூச்சுத் திணறல் ஏற்பட்டு அவர்கள் கடலூர் அரசு மருத்துவமனையில் சிகிச்சைக்காக அனுமதிக்கப்பட்டு அதில் கீழ்காணும் நான்கு தொழிலாளர்கள் மரணமடைந்தள்ளனர்.

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| 1. | திரு.ராஜ்குமார், (வயது-42) த/பெ.திரு.ராஜேந்திரன், பழையவண்டிப்பாளையம், கடலூர், |
| 2. | திரு.கணபதி, (வயது-25) த/பெ.திரு.கருணாகரன், செம்மங்குப்பம், கடலூர். |
| 3. | திருமதி.சவிதா, (வயது-35) க/பெ.திரு.செந்தில்சுமார், அங்காளம்மன் கோயில் தெரு, காரைக்காடு. |
| 4. | திரு.விஜேஷ்ராஜ், (வயது-25) த/பெ.திரு.விஜயகுமார்,எண்.88, எத்திராஜ் நகர், வண்ணாரப்பாளையம், பரங்கிப்பேட்டை, கடலூர். |

மற்றும் 11 தொழிலாளர்கள் கடலூர் அரசு மருத்துவமனையிலும், ஒரு தொழிலாளர் பாண்டிச்சேரியில் உள்ள மகாத்மா காந்தி மருத்துவமனையிலும் சிசிச்சி முடிந்து திரும்பியுள்ளனர்

| | |
|-----|---|
| 1. | திரு. ஹரிகரன், (வயது- 23) த/பெ. திரு. முத்துமுருகன், நம்பர் 26 வார்டு, தேவர் நகர், சின்னமனூர், தேனி. |
| 2. | திரு. ராஜ், (வயது- 29) த/பெ. திரு. மாயவேல், நம்பர் 50 வார்டு, மாரியம்மன்கோயில்தெரு, சுப்பிரமணியபுரம், கடலூர் |
| 3. | திரு. வினோத்குமார், (வயது- 25) த/பெ. திரு.தமிழ்மணி, 684/47, முத்து மாரியம்மன்கோயில்தெரு, பாதிரிகுப்பம், கடலூர் |
| 4. | திரு.மணிகண்டன், (வயது- 31) த/பெ. திரு. ராஜேந்திரன், 650/3, மாரியம்மன்கோயில்தெரு, வடக்குமேலூர், குறிஞ்சிப்பாடி. |
| 5. | திரு.ஜவஹர்லால்கௌஷரி ராஜன், (வயது-29) த/பெ. திரு.சேசாசலம், 775, மெயின் ரோடுபத்திரகோட்டை அஞ்சல், பண்டுட்டி. |
| 6. | திரு.சுபரி, (வயது- 21) த/பெ. திரு. சேகர், 5/135, குலாலர் தெரு, சவுத் வளவல்லான் தெரு, தூத்துக்குடி. |
| 7. | திரு.ராம்குமார், (வயது- 22) த/பெ. திரு. பழனியப்பன், நம்பர் 23, மோகன்சிங் தெரு, கடலூர். |
| 8. | திரு.சத்தியமூர்த்தி, (வயது- 30) த/பெ. திரு. லட்சுமணன், 51, மாரியம்மன்கோயில்தெரு, அன்னவல்லி. |
| 9. | திரு.சதீஷ்குமார், (வயது- 27) த/பெ. திரு. பூராசாமி, 996, வடக்குதெரு, மஞ்சக்குழி அஞ்சல், சிதம்பரம், கடலூர். |
| 10. | திருமதி. செல்வி, (வயது- 42) க/பெ. திரு.திரிசங்கு, அங்காளம்மன் கோயில்தெரு, காரைக்காடு, சிப்காட், கடலூர். |
| 11. | திருமதி. குணசந்தரி, (வயது- 49)க/பெ. திரு.முருகானந்தம், 26, வடக்குதெரு, கேப்பார் குவாரி அஞ்சல், பெரியகாரைக்காடு, காரைக்காடு, கடலூர். |
| 12. | திரு. விக்னேஷ், (வயது- 25) த/பெ. திரு. செல்வராசு, காளியம்மன் கோயில்தெரு, சுப்பம்மாள் சத்திரம், ஆண்டார்முள்ளிப்பள்ளம், கடலூர். |

மேற்காணும் விபத்து குறித்த விபரம் உடன் இணை இயக்குநர், தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம் கடலூர், மற்றும் இயக்குநர், தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம் சென்னை அவர்களுக்கும் தெரிவிக்கப்பட்டிருக்கவில்லை. மேலும், மரணமடைந்த ஒவ்வொரு தொழிலாளர்களுக்கான படிவம் 18 தனித்தனியே விபத்து நடந்த 12 மணி நேரத்திற்குள் அனுப்பி வைக்கப்பட்டிருக்கவில்லை. மேலும், காயமடைந்த தொழிலாளர்களுக்கும் படிவம் 18 தனித்தனியே அனுப்பி வைக்கப்பட்டிருக்கவில்லை.

இது பிரிவு 88 விதி 96டி முரண்பாடாகும்

இணை இயக்குநர்,
தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம்,
கடலூர்.(மு.கூ.பொ).

மணி
08/06/2021

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Office of the Joint Director of Industrial Safety and Health, Cuddalore.

From

Mr. R. Siddhartha, ME,MBA, DIH.,
Joint Director,
Industrial Safety and Health,
Cuddalore. (M.C.E.)

To

Thiru.A.Paranitharan,(Age54)
S/o. Alwar,
Manager,
Crimsun Organics Private Limited,
Plot No.C9, C10,011,
Sipcot Industrial Complex,
Kudikadu Village,
Cuddalore District.

No.E/ 909/2021 Date: 08.06.2021

Dear Sir,

Sub: Factories Act, 1948 (Amendment Act, 1987) and Tamil Nadu Factories Rules 1950 and other Acts – Accident- The accident that took place on 13-05-2021 at M/s. crimson Organic Pvt. Ltd, set up in the SIPCOT Industrial Estate, Plot No: C9,C10 & C11, Kudikadu Village, Cuddalore District, [Registration No:CDR01044], in which 4 people lost their life and 12 employees were injured. On inspection, it was found that there were certain lapses in following the safety measures. Notice has been issued to the factory manager, Mr. Paranitharan asking for the lapse/ shortcomings.

Ref: Summary of Inspection Report CDR 01044 Dated: 08.06.2021

On inspecting the factory on 13-05-2021, we found that, there were certain violation of law and in the inspection report, that was submitted has items No: 1 to 6, we request you to reply us in writing within 7 days of receiving this notice. in case if you fail to respond or reply within the stipulated time, we would assume that you donot have any

valid answers / explanations and will take appropriate action without giving any further notice

Attached : summary of Inspection Report

sd// 08-06-2021

Joint Director, Industrial Safety and Health
Cuddalore. (M.C.E.)

Office of the Joint Director of Industrial Safety and Health, Cuddalore.

From

Mr. R. Siddhartha, ME,MBA, DIH.,
Joint Director,
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To

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Ref: My Inspection conducted date: 13-05-2021

When I inspected, I found certain violations of law and other conditions. I am sending herewith the inspection report summary .

sd// 08-06-2021

Joint Director, Industrial Safety and Health
Cuddalore. (M.C.E.)

**Factories Act, 1948 (with Factories Amendment Act, 1987) and Tamil Nadu
Factories Rules 1950 and other Acts and Rules**

Section 87 Rule 95 Schedule XVI Part III Item 6 and Section 41 Rule 61 E & F:

M/s. crimson Organic Pvt. Ltd, set up in the SIPCOT Industrial Estate, Plot No: C9,C10 & C11, Kudikadu Village, Cuddalore District, was registered under the Factories Act, 1948 and its Registration No is CDR01044. For the year 2021, this industry has been given license to operate with the maximum manpower limit of 260 employes and 1573 hp (horsepower) and the company is manufacturing pesticides such as Fibrionil Technical, Acetamiprid Technical, Fluroxy pyr Technical in bulk (bulk drugs)

The residue from the product Acetamiprid is Acetamiprid Filterate M.L mixture (traces of Isopropyl Alcohol + traces of Acetamiprid + traces of CPMMA + impurities). Before disposing this residue, the Isopropyl Alcohol solvent that is mixed in this product, is first separated from the residue. To separate this, this mixture is taken to the second floor and poured in to the boiler Reactor Vessel No.:108 and it is steamed and then Isopropyl Alcohol is separated through Distillation process. On 12.05-2021, after Isopropyl Alcohol was separated, balance residue (traces of Isopropyl Alcohol + traces of CPMMA + traces of Acetamiprid + impurities) which was in the high temperature was kept in the boiler to cool down and to be collected in the drum the next day. On 13-05-2021, as the steaming process from the boiler not stoped which lead to high temperature, due to which the residue such as Isopropyl Alcohol, CPMMA and Acetamiprid were converted in to very high pressure vapour. The manhole in the boiler was not closed properly, and the vapor pressure formed by the chemical mixture led to a huge blast to the manhole of the boiler which in turn lead to smoke and fire accident at around 7.30 am at the factory premises. Immediately the fire was got under control with the help fire engine and staff of the Fire Engine Department. 16 employees who were in the first, second, third floor of the factory were caught in the accident and could not

breathe in the fumes. They were admitted at Government General Hospital, Cuddalore and of them 4 lost their life .

| | |
|---|---|
| 1 | Mr. Rajkumar, (Age-42) S/o. Mr. Rajendran, Old Vandipalayam, Cuddalore, |
| 2 | Mr. Ganapathi, (Age-25) S/o. Thiru Karunakaran, Semmankuppam, Cuddalore. |
| 3 | Mrs. Savita (Age-35) W/o. Mr. Senthilkumar, Angalamman Temple Street, Karaikadu. |
| 4 | Mr. Wijeshraj, (Age-25) S/o. Mr. Vijayakumar, No.88, Ethiraj Nagar, Vannarapalayam, Parangipettai, Cuddalore. |

11 Employees were admitted at Cuddalore Government Hospital one was admitted at Mahathma Gandhi Hospital in Pondichey and they returned home from the hospital

| | |
|----|---|
| 1 | Mr. Harikaran, (Age- 23) S/o. Mr. Muthu Murugan, No.26 Ward, Devar Nagar, Chinnamanur, Theni. |
| 2 | Mr. Raj, (Age-29) S/o. Mr. Mayavel, No.50 Ward, Mariamman koil Street, Subramaniapuram, Cuddalore |
| 3 | Mr. Vinod Kumar, (Age-25) S/o. Mr. Tamilmani, 684/47, Muthu Mariamman koil Street, Pathirikuppam, Cuddalore 4. |
| 4 | Mr. Manikandan, (Age-31) S/o. Mr. Rajendran, 650/3, Mariamman koil Street, North Melur, Kurinjipadi. |
| 5 | Mr. Jawaharlal Gowri Rajan, (Age-29) S/o. Mr. Sesasalam, 775, Main Road badrakottai Post, Panruti. |
| 6 | Mr. Sabari, (Age-21) S/o. Mr. Sekar, 5/135, Gulalar Street, South Valavallan Street, Thoothukudi. |
| 7 | Mr. Ramkumar, (age 22) S/o. Mr. Palaniappan, No.23, Mohan Singh Street, Cuddalore. |
| 8 | Mr. Sathyamoorthy, (Age- 30) S/o. Mr. Lakshmanan, 51, Mariamman koil Street, Annavalli. |
| 9 | Mr. Satish Kumar, (Age 27) S/o. Mr. Poorasamy, 996, North Street, Manjakkuzhi Post, Chidambaram, Cuddalore. 10. |
| 10 | Mrs.Selvi, (Age- 42) W/o. Mr. Thirisanku, Angalamman koil Street, Karaikkadu, Sipcot, Cuddalore, 11. |
| 11 | Mrs. Gunasundari, (Age- 49) W/o. Mr. Muruganantham, 26, North Street, Capper Quarry Post, Periya karaikadu, Karaikadu, Cuddalore. |
| 12 | Mr. Vignesh, (age-25) S/o. Mr. Selvarasu, Kaliasman koil Street, Subbammal Chattram, Andarmullipallam, Cuddalore. |

Reactor vessel 108 in the factory has not been installed with the proper safety measures and was used without proper safety precautions due to which 4 people lost their life and 12 were injured

1. In an unexpected circumstances when the heat and pressure are far beyond the prescribed limit, Reactor vessel should have a safety valve which is connected to the scrubber system of a required capacity through a pipeline so that the pressure could be released and it would not endanger life of the employees, was not done.
2. There was a leak in the steam line connected to the Reactor Vessel which could have been stopped from steam going in to the Reactor Vessel, had Double Valvewith and Bleeder valve were installed, but that was not done
3. When the temperature is beyond the prescribe limit, in order to stop the chemical Acetamiprind FiltarateM.L inside the Reactor Vessel from decomposing and forming pressure, the steam line should be disconnected , coolant water should be poured to cool the reactor, even this was not done.
4. Easily flammable Solvent Isopropyl Alcohol (IPA) from Acetemipridd FillatateML , was not completely separated from the Reactor 108 and since Residual IPA was more than the presecribed limit and due to steam leak which lead to high temperature and it created huge pressure in the Reactor 108, which led to the blast through the manhole and due to which chemical toxic fumes were released.

These violations are against the Section 87, Rule 95 Schedule XVI Part III Item and Section 41 Rule 61 E&F

2. Section 41 Rule 61M

M/s.Crimsun Orgnaics Pvt Ltd (Registration No: CDR 01044) situated at Plot No.C9, C10, 011, SIPCOT Industrial Complex, Kudikadu Village, Cuddalore District, in this factory Safety Committee is not formed according the above rule and the safety committee of the factory did not work according to the functions and duties of the rules falling under sub section 7.

These violations are against the Section 41, Rule 61M

3. Section 87 Rule 95 Schedule XVI Part (II) Paragraph-7

M/s.Crimsun Orgnaics Pvt Ltd (Registration No: CDR 01044) situated at Plot No.C9, C10, 011, SIPCOT Industrial Complex, Kudikadu Village, Cuddalore District, the inspection of the Instruments and Safety Devices were to be checked monthly once by a competent person authorized by The Director,

Industrial Safety and Health, whose observations has to be recorded in the register and register is to maintained, which was also not done

These are violations against the section 87, Rule 95 Schedule XVI Part (II), Paragraph-7

4.Section 87 Rule 95 Schedule XVI Part (II) Paragraph 15

M/s.Crimsun Orgnaics Pvt Ltd (Registration No: CDR 01044) situated at Plot No.C9, C10, 011, SIPCOT Industrial Complex, Kudikadu Village, Cuddalore District, the chemical Plant, Equipment and machinery should be inspected before the start of the process every day and once in two years by a competent person approved by the Director, Industry Safety and Health , was also not done . There is not register or record to show that the dangerous Plant, Equipment and machinery due to failure were checked every month and the details were registered in the record

These are violations against the section 87, Rule 95 Schedule XVI Part (II), Paragraph-15

5. 4 Section 87 Rule 95 Schedule XVI Part (II), Paragraph-23

M/s.Crimsun Orgnaics Pvt Ltd (Registration No: CDR 01044) situated at Plot No.C9, C10, 011, SIPCOT Industrial Complex, Kudikadu Village, Cuddalore District, there is no record to show that there were any possible emergencies occurred during the processing, maintaining and repairing. They have not submitted any Safety Plan arises out of the identified emergency problems to The Director, Industrial Safety and Health. Once in every three months, a Mock drill of Emergency procedure Rehearsal should be done to identify the shortcomings during the emergency situations.

These violdations are against the sections 87 Rule 95 Schedule XVI Part (II) Paragrahy 23

6. Section 88 Rule 96

M/s.Crimsun Orgnaics Pvt Ltd (Registration No: CDR 01044) situated at Plot No.C9, C10, 011, SIPCOT Industrial Complex, Kudikadu Village, Cuddalore District, The residue from the product Acetamiprid is Acetamiprid Filterate M.L mixture (traces of Isopropyl Alcohol + traces of Acetamiprid + traces of CPMMA +

impurities). Before disposing this residue, the Isopropyl Alcohol solvent that is mixed in this product, is first separated from the residue. To separate this, this mixture is taken to the second floor and poured in to the boiler Reactor Vessel No.:108 and it is steamed and then Isopropyl Alcohol is separated through Distillation process. On 12.05-2021, after Isopropyl Alcohol was separated, balance residue (traces of Isopropyl Alcohol + traces of CPMMA + traces of Acetamidrid + impurities) which was in the high temperature was kept in the boiler to cool down and to be collected in the drum the next day. On 13-05-2021, as the steaming process from the boiler not stopped which lead to high temperature, due to which the residue such as Isopropyl Alcohol, CPMMA and Acetamidrid were converted in to very high pressure vapour. The manhole in the boiler was not closed properly, and the vapor pressure formed by the chemical mixture led to a huge blast to the manhole of the boiler which in turn lead to smoke and fire accident at around 7.30 am at the factory premises. Immediately the fire was got under control with the help fire engine and staff of the Fire Engine Department. 16 employees who were in the first, second, third floor of the factory were caught in the accident and could not breathe in the fumes. They were admitted at Government General Hospital, Cuddalore and of them 4 lost their life.

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|---|---|
| 1 | Mr. Rajkumar, (Age-42) S/o. Mr. Rajendran, Old Vandipalayam, Cuddalore, |
| 2 | Mr. Ganapathi, (Age-25) S/o. Thiru Karunakaran, Semmankuppam, Cuddalore. |
| 3 | Mrs. Savita (Age-35) W/o. Mr. Senthilkumar, Angalamman Temple Street, Karaikadu. |
| 4 | Mr. Wijeshraj, (Age-25) S/o. Mr. Vijayakumar, No.88, Ethiraj Nagar, Vannarapalayam, Parangipettai, Cuddalore. |

11 Employees were admitted at Cuddalore Government Hospital one was admitted at Mahathma Gandhi Hospital in Pondichey and they returned home from the hospital

| | |
|---|--|
| 1 | Mr. Harikaran, (Age- 23) S/o. Mr. Muthu Murugan, No.26 Ward, Devar Nagar, Chinnamanur, Theni. |
| 2 | Mr. Raj, (Age-29) S/o. Mr. Mayavel, No.50 Ward, Mariamman koil Street, Subramaniapuram, Cuddalore |
| 3 | Mr. Vinod Kumar, (Age-25) S/o. Mr. Tamilmani, 684/47, Muthu Mariamman koil Street, Pathirikuppam, Cuddalore 4. |
| 4 | Mr. Manikandan, (Age-31) S/o. Mr. Rajendran, 650/3, Mariamman koil Street, North Melur, Kurinjipadi. |
| 5 | Mr. Jawaharlal Gowri Rajan, (Age-29) S/o. Mr. Sesasalam, 775, Main Road badrakottai Post, Panruti. |

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| 6 | Mr. Sabari, (Age-21) S/o. Mr. Sekar, 5/135, Gulalar Street, South Valavallan Street, Thoothukudi. |
| 7 | Mr. Ramkumar, (age 22) S/o. Mr. Palaniappan, No.23, Mohan Singh Street, Cuddalore. |
| 8 | Mr. Sathyamoorthy, (Age- 30) S/o. Mr. Lakshmanan, 51, Mariamman koil Street, Annavalli. |
| 9 | Mr. Satish Kumar, (Age 27) S/o. Mr. Poorasamy, 996, North Street, Manjakkuzhi Post, Chidambaram, Cuddalore. 10. |
| 10 | Mrs.Selvi, (Age- 42) W/o. Mr. Thirisanku, Angalamman koil Street, Karaikkadu, Sipcot, Cuddalore, 11. |
| 11 | Mrs. Gunasundari, (Age- 49) W/o. Mr. Muruganantham, 26, North Street, Capper Quarry Post, Periya karaikadu, Karaikadu, Cuddalore. |
| 12 | Mr. Vignesh, (age-25) S/o. Mr. Selvarasu, Kaliasman koil Street, Subbammal Chattram, Andarmullipallam, Cuddalore. |

The information about the accident that occurred was not shared with The Joint Director, Industrial Safety and Health, Cuddalore and The Director, Industrial Safety and health, Chennai. Moreover Form 18 was not issued individually to the deceased employees within 12 hours of the accident and form 18 was not issued individually to the injured employees.

These are violations against the Section 88 Rule 96

sd// 08-06-2021

Joint Director,

Industrial Safety and Health
Cuddalore. (M.C.E.)

ANNEXURE-K (COLLY.)**Date : 24.06.2021**

Ref No : COPL/HRD/21-22/005

From
 Crimsun Organics Pvt Ltd
 C-9,C-10 &C-11, SIPCOT Industrial Complex
 Kudikadu, Cuddalore
 Tamil Nadu-607005

To
 Joint Director
 Industrial Safety & Health
 Cuddalore

Dear Sir,

Sub: The Factories Act, 1948 (Amended Act 1987) and Tamil Nadu Factory Rules, 1950-
 Crimsun Organics Private Limited, Regd. No. CDR 01044

Accident dated 13.05.2021- Deviations in practices - Show Cause Notice to **Occupier** –
 reg

Ref: 1) Show Cause Notice to **Occupier** No. E / 908/ 2021 dated 08.06.2021, issued by
 Joint Director, IS&H, Cuddalore

2) Brief Inspection Report- CDR 01044 dt 08.06.2021

3) Our communication to dated 15.05.2021, 22.05.2021& 11.06.2021

We are in receipt of the above referred show cause notice, issued by your good self, on 11th
 June 2021. Also, you were kind enough to give grace time of further 7 days, to submit our
 response, in addition to the earlier time awarded.

We have given our Technical / Scientific explanations wherever required; also responded on
 the legal compliance deviations as highlighted in this notice, with our inherent commitment
 and respect to the laws of the land, more contextually, The Factories Act, 1948 (Amended
 Act 1987) and Tamil Nadu Factory Rules, 1950 and also to the well-being of our employees
 and other stakeholders. Also, we wish to submit that we have effectively adopted the system-
 based resources for the manufacturing process and also in the process of implementing
 Integrated Management System, for our facility that would strengthen our documentation
 system, further. The contents of show cause issued, and our responses are tabulated below.

137.28
28/6/21
 OFFICE OF THE JOINT DIRECTOR OF
 INDUSTRIAL SAFETY AND HEALTH
 CUDDALORE.



| No. | Observation made / Show cause issued by Joint Director, IS&H, Cuddalore | Response / Explanation by Crimsun Organics Private Limited |
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| I | <p><u>Section 7A, Section 87, Rule 95, Schedule XVI, Part III, sub part 6 & Section 41, Rule 61, E&F</u></p> <p>At Crimsun Organics, after the completion of Acetamidrid production, are using Reactor 108, located in second floor to recover isopropyl Alcohol from the filtrate mother liquor mixture, containing traces of isopropyl alcohol + traces of Actamidrid + traces of CPMMA + impurities. Isopropyl alcohol is recovered by distillation using steam.</p> <p>On 12.5.2021, after separation of isopropyl alcohol from the mother liquor, remaining residue, at hot temperature, containing traces of isopropyl alcohol + traces of Actamidrid + traces of CPMMA+ impurities, is kept in the reactor to get cooled, in order to fill in the drums during the next day.</p> <p>On 13.05.2021, since the steam supply to the reactor having not fully stopped, due to continuous heating, residual isopropyl alcohol + CPMMA + Actamidrid had vaporized, to produce high pressure. At 0740hrs, as the manhole cover was not tightly</p> | <p>In Distillation kettle, R-108, isopropyl alcohol (IPA) solvent-recovery from mother liquor was taking place. On 13th May, at 0200hrs, i.e. during the night shift of 12.05.2021, the IPA recovery operation was completed; Steam supply to the Kettle limpet coil was stopped around 0200 hrs, by the Shift Chemist, by closing the steam line inlet valve, during the same shift; He kept the stirrer in 'ON' condition and informed the night shift Chemical Engineer, about the status of the R-108. Engineer went to the second floor and inspected the residue, inside the Kettle R-108 and instructed the Chemist that once the temperature of residue cools to 60 Deg C, it can be drained, during first shift hours, of the succeeding day.</p> <p>The next day morning, i.e. on 13.05.2021, at around 0730 hrs, A-shift Chemist, who was operating the nearby reactor, had sensed some smell coming from the reactor area and informed to the Shift Chemical Engineer. Immediately the latter, came to the spot and noticed seal lubricant oil from the agitator mechanical seal pot, started flowing out from the seal pot from the hose, over the kettle and smoke coming from the manhole cover of Kettle (R-108). He tried to apply cooling water to the Kettle (R-108) limpet coil, but gave up, when he had observed a mild blast lifting the manhole top cover at about 0740hrs, and more smoke started coming.</p> <p>Malfunctioning of the steam valve might have led to the continued heating of the residue, even after closing the valve at 0200 hrs. Sudden blast-opening of the manhole, with minor fire and splash of fluid occurred around 0740hrs. Fire at incipient stage could not be controlled, due to leaking seal oil over the reactor. Another source of ignition could be the</p> |



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| | <p>closed, the above said vapour stage chemical mixture with pressure, had blast opened the manhole to produce fire and was surrounded by smoke. Immediately, with the help of fire tender, the fire was brought under control.</p> <p>Anyhow, since this poisonous smoke (fumes) came out and those 16 employees working in first, second, third floor since breathed the same, suffocated, got admitted at Cuddalore Government Hospital for treatment and in that, the following 4 employees died:</p> <p>(1) Mr. Raj Kumar, (2) Mr. Ganapathy, (3) Mrs. Savita, (4) Mr. Vijesh Raj.....</p> <p>and 11 employees (Names given) at Cuddalore Government Hospital and 1 employee at Mahatma Gandhi Hospital at Puducherry were completed the treatment and returned.</p> | <p>static discharge developed, due to sudden opening of manhole.</p> <p>The mild blast and / static discharge might be the ignition source to trigger the fire of leaking agitator seal oil, over the kettle. Just before the incident, the seal oil supply-tube to the agitator-seal was seen disconnected and oil was flowing above the kettle; This hot oil vapour and the less tight manhole, might be due to minor gasket damage, created a mild blast. Also the hot splash of residue of about 180-200 Liters, over the paper bags, kept on the floor, have aggravated the fire. These paper bags are made of outer paper and inner polythene coated developed more smoke, and the quantity of bags were about 40 - 50 Nos. Also, cold insulation material of the chilled water supply / return lines and hot insulation of the kettle started giving thick smoke, due to hot fallen residue material. Before one could realize the intensity, large amount of smoke developed.</p> <p>Since Residue material is fundamentally comprising high boilers, it could not act as a fuel; other low boiling components were already recovered along with isopropyl alcohol and less significant quantity of CPMMA and the Acetamidrid were left out. Also, Kettle normally could not see any pressure as the system is connected to scrubber with ID Fan, through primary, secondary and Tertiary condensers.</p> <p>Fire brigade put foam and soon put out the fire. Our employees suffocated mainly due to combustion products resulted from firing seal oil about 4 – 5 litre, paper bags about 50 Nos and cold insulation material of Chilled water piping. Such combustion products that result in any general fire accident, might have caused the suffocation and that led later, unfortunate loss of life of four of our employees.</p> <p>There was no toxic gas leak and no nearby resident got affected; also, no complaint was made by anyone.</p> |
| <p>1 (1)</p> | <p><u>Section 7A, Section 87, Rule 95, Schedule XVI, Part III, sub part 6 & Section 41, Rule 61, E&F</u></p> | <p>R 108 is not a reactor and is a distillation kettle, operated at slightly below atmospheric pressure, using a Induced Draft (ID) fan at the downstream of</p> |



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| | <p>There was no safety valve provided and connected to the designed required-capacity scrubber system in the said reactor, to prevent, employees from the danger of emanating chemical vapors, in the event of unexpected raise in the temperature or pressure.</p> | <p>scrubber. Since R108, by design, is not a pressure vessel, no safety valve is considered. Also, Kettle 108 is already connected to scrubber, that is adequately designed, through primary, secondary and tertiary condensers.</p> <p>Since R 108 is already connected to the scrubber through condensers, and under suction using ID Fan, employees are prevented from the danger of emanating vapour.</p> |
| <p>1 (2)</p> | <p><u>Section 7A, Section 87, Rule 95, Schedule XVI, Part III, sub part 6 & Section 41, Rule 61, E&F</u></p> <p>On the steam supply line to Reactor 108, No Safe Bleeder had been provided by COPL, in between the two steam valves. Bleeder valve could help, when steam leaks or passing through closed valve.</p> | <p>In the design stage itself, eliminating the fire-prone heating media is an illustration of an in-built safe design. Here we have not gone for Electrical heaters or hot oil / thermic fluid-based heating, but chosen steam, which is an inherently safe media, from the angle of prevention of fire.</p> <p>Also, low pressure steam of less than 2.7 Bar G is employed in the limpet coil of the Distillation kettle, R-108. For controlling the steam pressure at below 2.7 Bar G, in the limpet coil to R-108, automatic steam pressure regulation valve (PRV) is provided in the steam header; In addition to PRV, a secondary control viz. a Safety Valve is provided, at the downstream of PRV, and it is set to open, if the steam pressure reaches 2.9 Bar G. Also, a tertiary safety control viz. another safety valve in the limpet coil of the distillation kettle is provided to ensure steam pressure inside the limpet coil not to exceed 3.0 Bar G. Thus, Kettle R-108 is already designed, with a three-fold safety protection, on steam heating.</p> <p>To monitor the temperature of the distillation mass, inside the reactor, Digital Display Resistance Temperature Detector (RTD) is provided. (Photo Annexure -1). For monitoring the pressure inside the distillation kettle, pressure gauge is provided.</p> <p>Bleeder Valve arrangement is not warranted, as temperature cannot go beyond the steam temperature and pressure of steam is already controlled and also kettle is under mild suction, through scrubber connected to ID fan.</p> |



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| <p>1(3)</p> | <p><u>Section 7A, Section 87, Rule 95, Schedule XVI, Part III, sub part 6 & Section 41, Rule 61, E&F</u></p> <p>When the temperature of Reactor 108, goes above the designated operating temperature, to prevent the decomposition of the Acetamidrid filtrate and thereby to reduce the developed high pressure, no system was there, to stop the steam addition and inject the cooling water in order to get the heat soon lowered.</p> | <p>Kettle 108 is conned to a mild suction ID fan, post the condenser system. Under any situation, pressure of the reactor will not increase.</p> <p>We have designed the jacket system in which after the usage of steam i.e., when IPA recovery is completed, steam will be closed and if an emergency arises, we can switch over to cooling water and reduce the temperature quickly. So, at the moment when our operator realized the emergency situation it was already became too late.</p> <p>In this case, an external trigger of seal oil leak and a mild but spontaneous blast occurred through the slight vapor leak through the minute gap of gasket of manhole lid. In fact, our A- shift engineer has observed the same and before he initiates to turn cooling water, this incident occurred.</p> |
| <p>1(4)</p> | <p><u>Section 7A, Section 87, Rule 95, Schedule XVI, Part III, sub part 6 & Section 41, Rule 61, E&F</u></p> <p>Since IPA was present excessive in the Acetamidrid filtrate ML, as was not fully recovered in R 108 system compared to the specified level, and also leaky steam line increased the temperature thereby high pressure broken the manhole lid released chemical toxic fume.</p> | <p>Specified quantity of IPA had been completely recovered on the previous day night shift itself and hence batch was stopped and only collection of residues was planned for the next day.</p> <p>Passing / Leaky steam valve had not allowed the system to cool. Since the system is connected to suction blower, even if IPA present, it will be condensed in the condensers and non-condensable will be released through the scrubber. Might be the less tightened manhole lid or slight worn out of gasket, vapour breathing and leaky seal oil of about 4 litres, combined with an external trigger seems to be the cause to blast open the lid. Fire at incipient stage was aggravated due to hot splash of residue of about 180 to 200 Litres, over the paper bags, kept on the floor. These paper bags are made of outer paper and inner polythene coated developed more smoke, and the quantity of bags were about 40 - 50 Nos. Also, cold insulation material of the chilled water supply / return lines and hot insulation of R 108 started giving thick smoke, due to hot fallen residue material.</p> <p>Our employees suffocated might be due to smoke having combustion products resulted from the fire, from burnt seal oil, paper bags and cold insulation material of chilled water piping and hot insulation material of R 108. Such combustion products that result in any general fire accident, used to deplete</p> |



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| | | <p>oxygen concentration in air and to cause suffocation.</p> <p>It is understood that there was no chemical toxic fume leak; Also, no nearby resident got affected and no complaint was made by anyone.</p> |
| 2. | <p><u>Section 87, Rule 95, Schedule XVI, para 7</u></p> <p>Crimsun Organics Private Limited has not recorded and maintained specified Registers for documenting the monthly examination and testing of "Instrument and Safety devices" carried out by the competent person, approved by the Director, Industrial safety and Health</p> | <p>Our "Instrument and Safety devices" testing and calibration practices are clearly written down and being carried out by both internal and external domain competent persons. A sample specimen of Hazard Identification & Risk Assessment (HIRA) Register is enclosed, (Annexure -2) and examination conducted by external Competent person is also enclosed (Annexure - 3)</p> <p>Also, Examination of devices used in the process are tested before taking into use and also after carrying out any repair, is done by approved competent person, depends on usage, and based on seasonal product requirements from our end customers. (Annexure - 4).</p> |
| 3. | <p><u>Section 87, Rule 95, Schedule XVI, part II, para 15</u></p> <p>All parts of plant, equipment and machinery used in the process which in the likely event of their failure may give rise to emergent situation were not tested in an appropriate procedure by a competent person, before commencing the process and retested at an interval of two years.</p> <p>Also details of repairs being carried out and examination done once in a month, to such parts of plant, equipment, and machinery, after a failure that may give rise to an emergent situation, have not recorded in specified registers and shown during periodical inspection carried out.</p> | <p>Examination of all vessels including pressure vessels and wherever applicable hydro, pneumatic and ultrasonic tests are conducted by external competent persons, at the desired periodicity, in compliance with TN Factories Rules, 1950. (Annexure - 5)</p> <p>Notwithstanding the above examinations, any failed machinery is replaced with a new one and also will be repaired, wherever possible. After such repair, depending on the safety impacts, all such equipment / machinery are put into stringent test, before lining for process use, for e.g., water run, nitrogen purge, pneumatic tests, etc., Such Records are perfectly maintained (Annexure - 6) and made available during inspection.</p> |



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| 4. | <p><u>Section 87, Rule 95, Schedule XVI, para 23</u></p> <p>All possible emergencies that could occur in the processes during the course of work or while carrying out maintenance work or repair work have not been identified.</p> <p>To meet all such identified emergencies, No detailed plan has been formulated and submitted to the Director, Industrial Safety and Health.</p> <p>Emergency procedures were not rehearsed every three months and deficiencies, in the achievement of the objectives were not suitably corrected.</p> | <p>Possible emergencies are already identified, both related to process and maintenance. A list of Possible emergencies at COPL is shown in Annexure- 7.</p> <p>A detailed procedure on Onsite Emergency and Disaster Management was submitted on 1st September, 2020 to the Deputy Director, IS&H, Cuddalore and awaiting approval. Our Disaster Management plan has been in line with the one, earlier released for SIPCOT , Cuddalore Plants, by the concerned authorities.</p> <p>Rehearsal of many Emergency mocks were conducted and deficiencies are documented (Annexure – 8 for two mock drills); Of course, during this pandemic period since April 2020, we operate only with 50% of strength and could involve all available number of employees.</p> |
| 5. | <p><u>Section 41, Rule 61 M</u></p> <p>Safety Committee was not constituted as stated in this rule and also functions and duties of the committee were not carried out, as stipulated in sub section 7,</p> | <p>Safety committee has been already constituted comprising a senior official, Head Safety, representative from each function viz. production, maintenance, purchase departments and also representative from workers and quarterly meetings are conducted regularly. Minutes of Meeting are recorded (Recent minutes of Safety committee shown in Annexure - 9).</p> <p>As per sub section (7), Safety Committee helps in improving the Safety awareness of employees, safety training, understanding management objectives / policy on safety, achieving practical solutions for identified problems in shop floor, safety audits, emergency and disaster management plans, implementation of safety suggestions, route cause analysis of accidents, corrective actions and preventive measures, etc.,</p> |
| 6. | <p><u>Section 7A (3) , Section 41B (2) & Section 112</u></p> <p>Health & Safety Policy is not prepared as detailed in sub section 4 & 5 and also not submitted to the Director, IS & H.</p> | <p>Our Health & Safety policy is given in Annexure - 10 which was prepared based on the premise of general duties of manufacturers as outlined in the Factories Act, 1948, within the context of COPL organization at Cuddalore.</p> <p>Activities like Establishing and Manufacturing of Crimsun Organics Private Limited have been just</p> |



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| | | <p>attaining the age of 2 years . The linkages between Organisational policy viz. Vision / Mission statements and the Safety & Health policy have taken good shape; COPL tries to achieve the Economic and Business objectives in these 2 years, of course now, COPL management goes for a Integrated Mangement system for its manufacturing process and we are sure, would be re-visiting our current Safety & Health Policy, and any revision if required, we would surely address the same.</p> <p>The Occupier has taken all necessary steps in educating all our workers the hazardous nature of our Process , Storages, along with the mitigation system that are built through extensive training; also has employed domain experts at the supervisory level; Every worker is educated on the occupational hazards and Material Safety Data Sheets. We maintain 100 % transparency in the manufacturing operations among all the concerned. We have communicated the details of our process description / Equipment and Building Layout drawings, etc., to the Directorate and Onsite Emergency and Disaster Management procedures were prepared and submitted to Deputy Director, IS&H, Cuddalore,</p> <p>As per sub rule 4, top management's commitment is made very clear as "no injury for any worker and preventing ill health through proactive implemented measures" ; In fact, implies more of a system orientation rather than a piece-meal solution.</p> <p>We have robust responsibility matrix for all our employees, including contractors and transporters that we will be bringing to the Safety & Health Policy also.</p> <p>We will submit at the earliest, our Safety & Health policy, that is due for revision, to The Director, Industrial Safety & Health.</p> |
| 7. | <p><u>Section 7A (3) , Section 41B (2) & Section 112, Rule 62-O(C)</u></p> <p>Having employed more than 200 workers, COPL has not employed, one full time medical officer of requisite qualification, one nurse, one dresser-cum-compounder and one sweeper-cum-ward boy, with a Occupational Health</p> | <p>We have already engaged a full time Medical Officer at our OHC, though it is not obligatory on our part to employ a full time Medical officer, since we operate with a strength of only 190 employees including contract workers. (Annexure -11, Letter copy acknowledged at Director office)</p> <p>For more than a year, our Top Management kept on insisting us to engage a full time Medical officer. It was an ordeal task, to get a Physician with the willingness to work at full time in our OHC, at</p> |



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| | Centre with 2 rooms with a floor area of 15 square meter | <p>Cuddalore with requisite qualification in Industrial Health, along with his / her MBBS basic degree. Now, we have submitted on 14th June, 2021 to the Director, IS & H, Chennai an approval request for the employment of our Factory Medical Officer, in form 62- O.</p> <p>We have a well maintained OHC (Photo-Annexure - 12), full time Factory Medical Officer and 24 hours duty by medical attendants / nurses and sweeper.</p> <p>Infrastructure like, Oxygen cylinder (one in OHC & one in ambulance), Oxygen concentrator, bed for patient, blood pressure meter, first aid medicines, dressing bandages, etc. are available and maintained satisfactorily.</p> |
| 8. | <p>Section 41B (4) For this factory, On-site emergency plan and Disaster Control Measures have not been drawn up and also not made known to the workers employed therein and to the general public living in the vicinity of the factory about the safety measures to be followed during an accident in COPL:</p> | <p>We have already drawn up "On Site Emergency plan and Disaster Control Measures" and communicated to all concerned about the safety measures required to be followed, in the event of accident or such occurrences in our factory.</p> <p>On 1st September 2020, we have submitted our "On Site Emergency plan and Disaster Control Measures" to Deputy Director, IS&H, Cuddalore for his consent (Annexure- 13, Letter Copy).</p> |
| 9. | <p>Section 7A, Section 41A & Rule 62M</p> <p>COPL has not maintained Pre-Employment and Periodical examination Records in the prescribed forms viz. Form 39, Form 17 of their workers, employed in the "hazardous process", as medically examined by "Factory Medical Officer", before employment to ascertain physical fitness and once in a period of 6 months, to ascertain the health status of all workers, in respect of occupational health hazards to which they are exposed</p> | <p>We maintain such records in the stipulated format of Form 39 and Form 17.</p> <p>We have retained Alfa care Hospitals, Cuddalore, with a qualified medical practitioner, to medically examine our workers employed in hazardous process periodically and also Pre-Employment Examination to ensure fitness of new entrants. (Annexure - 14, Periodical examination conducted by Alfa Care)</p> <p>Recently we have employed a full time Factory Medical Officer and periodical examination of workers of hazardous plant area are being carried out and Records are maintained.</p> |



It is pertinent to mention here that the incident culminating the show cause notices are totally beyond our control and had resulted out of accidents over which we have no control notwithstanding the fact that we have built adequate safety devices for ensuring safe operation of the plant. The contents of our above reply will bring out the factual position.

After the above incident, we have further strengthened our plant system, taking into consideration of directions given by your department and implemented the same. We would like to submit further that over and above what has been stipulated in the Factories Act and Rules made therein, we have taken extra precautions and we assure that such incidence will not happen in future.

We pray your Good Self, not to proceed for any legal action against us.

Thanking you.
Yours faithfully

For M/s Crimsun Organics Private Limited



S Ramesh Prabakaran
(Occupier & Managing Director)

Cc: Additional Director, IS&H, Trichy

Encl: All Annexures, as stated



24th June 2021

Ref No : COPL/HRD/21-22/005

From

Crimsun Organics Pvt Ltd
C-9,C-10 &C-11, SIPCOT Industrial Complex
Kudikadu, Cuddalore
Tamil Nadu-607005

To

Joint Director
Industrial Safety & Health
Cuddalore

Dear Sir,

Sub: The Factories Act, 1948 (Amended Act 1987) and Tamil Nadu Factory Rules, 1950- Crimsun Organics Private Limited, Regd. No. CDR 01044 –
Accident dated 13.05.2021- Deviations in practices - Show Cause Notice to **Manager** – reg

Ref: 1) Show Cause Notice to Occupier No. E / **909** / 2021 dated 08.06.2021, issued by Joint Director, IS&H, Cuddalore
2) Brief Inspection Report- CDR 01044 dt 08.06.2021
3) Our communication dated 15.05.2021, 22.05.2021& 11.06.2021

We are in receipt of the above referred show cause notice, issued by your Good self, on 11th June, 2021. Also you were kind enough to give grace time of further 7 days, to submit our response to this show cause, in addition to the earlier time awarded.

We have given our Technical / Scientific explanations wherever required; also responded on the legal compliance deviations as highlighted in this notice, with our inherent commitment and respect to the laws of the land, more contextually, The Factories Act, 1948 (Amended Act 1987) and Tamil Nadu Factory Rules, 1950 and also to the well-being of our employees

IS&H
28/6/21
JOINT DIRECTOR OF
INDUSTRIAL SAFETY AND HEALTH
CUDDALORE.

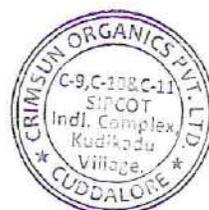


and other stakeholders. Also, we wish to submit that we have effectively adopted the system-based resources for the manufacturing process and also in the process of implementing Integrated Management System, for our facility that would strengthen our documentation system, further. The contents of show cause issued, and our responses are tabulated below.

| No. | Observation made / Show cause issued by Joint Director, IS&H, Cuddalore | Response / Explanation by Crimsun Organics Private Limited |
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| 1 | <p><u>Section 87, Rule 95, Schedule XVI, Part III, sub part 6 & Section 41, Rule 61, E&F</u></p> <p>At Crimsun Organics, after the completion of Acetamiprid production, are using Reactor 108, located in second floor to recover isopropyl Alcohol from the filtrate mother liquor mixture, containing traces of isopropyl alcohol + traces of Actamiprid + traces of CPMMA + impurities. Isopropyl alcohol is recovered by distillation using steam.</p> <p>On 12.5.2021, after separation of isopropyl alcohol from the mother liquor, remaining residue, at hot temperature, containing traces of isopropyl alcohol + traces of Actamiprid + traces of CPMMA+ impurities, is kept in the reactor to get cooled, in order to fill in the drums during the next day.</p> <p>On 13.05.2021, since the steam supply to the</p> | <p>In Distillation kettle, R-108, isopropyl alcohol (IPA) solvent-recovery from mother liquor was taking place. On 13th May, at 0200hrs, i.e., during the night shift of 12.05.2021, the IPA recovery operation was completed; Steam supply to the Kettle limpet coil was stopped around 0200 hrs, by the Shift Chemist, by closing the steam line inlet valve, during the same shift; He kept the stirrer in 'ON' condition and informed the night shift Chemical Engineer, about the status of the R-108. Engineer went to the second floor and inspected the residue, inside the Kettle R-108 and instructed the Chemist that once the temperature of residue cools to 60 Deg C, it can be drained, during first shift hours, of the succeeding day.</p> <p>The next day morning, i.e., on 13.05.2021, at around 0730 hrs, A-shift Chemist, who was operating the nearby reactor, had sensed some smell coming from the reactor area and informed to the Shift Chemical Engineer. Immediately the latter, came to the spot and noticed seal lubricant oil from the agitator mechanical seal pot, started flowing out from the seal pot from the hose, over the kettle and smoke coming from the manhole cover of Kettle (R-108). He tried to apply cooling water to the Kettle (R-108) limpet coil, but gave up, when he had observed a mild blast lifting the manhole top cover at about 0740hrs, and more smoke started coming.</p> <p>Malfunctioning of the steam valve might have led to the continued heating of the residue, even after closing the valve at 0200 hrs. Sudden blast-opening of the manhole, with minor fire and splash of fluid occurred around</p> |



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| | <p>reactor having not fully stopped, due to continuous heating, residual isopropyl alcohol + CPMMA + Actamiprid had vaporized, to produce high pressure. At 0740hrs, as the manhole cover was not tightly closed, the above said vapour stage chemical mixture with pressure, had blast opened the manhole to produce fire and was surrounded by smoke. Immediately, with the help of fire tender, the fire was brought under control.</p> <p>Anyhow, since this poisonous smoke (fumes) came out and those 16 employees working in first, second, third floor since breathed the same, suffocated, got admitted at Cuddalore Government Hospital for treatment and in that, the following 4 employees died:</p> <ol style="list-style-type: none"> (1) Mr. Raj Kumar, (2) Mr. Ganapathy, . (3) Mrs. Savita, (4) Mr.VijeshRaj,..... <p>and 11 employees (Names given) at Cuddalore Government Hospital and 1 employee at Mahatma Gandhi Hospital at Puducherry were completed the treatment and returned.</p> | <p>0740hrs. Fire at incipient stage could not be controlled, due to leaking seal oil over the reactor. Another source of ignition could be the static discharge developed, due to sudden opening of manhole.</p> <p>The mild blast and / static discharge might be the ignition source to trigger the fire of leaking agitator seal oil, over the kettle. Just before the incident, the seal oil supply-tube to the agitator-seal was seen disconnected and oil was flowing above the kettle; This hot oil vapour and the less tight manhole, might be due to minor gasket damage, created a mild blast. Also, the hot splash of residue of about 180-200 Liters, over the paper bags, kept on the floor, have aggravated the fire. These paper bags are made of outer paper and inner polythene coated developed more smoke, and the quantity of bags were about 40 - 50 Nos. Also, cold insulation material of the chilled water supply / return lines and hot insulation of the kettle started giving thick smoke, due to hot fallen residue material. Before one could realize the intensity, large amount of smoke developed.</p> <p>Since Residue material is fundamentally comprising high boilers, it could not act as a fuel; other low boiling components were already recovered along with isopropyl alcohol and less significant quantity of CPMMA and the Acetamiprid were left out. Also, Kettle normally could not see any pressure as the system is connected to scrubber with ID Fan, through primary, secondary and Tertiary condensers.</p> <p>Fire brigade put foam and soon put out the fire. Our employees suffocated mainly due to combustion products resulted from firing seal oil about 4 – 5 litre, paper bags about 50 Nos and cold insulation material of Chilled water piping. Such combustion products that result in any general fire accident, might have caused the suffocation and that led later, unfortunate loss of life of four of our employees.</p> <p>There was no toxic gas leak and no nearby resident got affected; also, no complaint was made by anyone.</p> |
| 1 (1) | <p><u>Section 87, Rule 95, Schedule XVI, Part III, sub part 6 & Section 41, Rule 61, E&F</u></p> | <p>R 108 is not a reactor and is a distillation kettle, operated at slightly below atmospheric pressure, using a Induced Draft (ID) fan at the downstream of scrubber. Since R108, by design, is not a pressure vessel, no safety valve is</p> |



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| | <p>There was no safety valve provided and connected to the designed required-capacity scrubber system in the said reactor, to prevent employees from the danger of emanating chemical vapors, in the event of unexpected raise in the temperature or pressure.</p> | <p>considered. Also, Kettle 108 is already connected to scrubber, that is adequately designed, through primary, secondary and tertiary condensers.</p> <p>Since R 108 is already connected to the scrubber through condensers, and under suction using ID Fan, employees are prevented from the danger of emanating vapour.</p> |
| 1 (2) | <p><u>Section 87, Rule 95, Schedule XVI, Part III, sub part 6 & Section 41, Rule 61, E&F</u></p> <p>On the steam supply line to Reactor 108, No Safe Bleeder had been provided by COPL, in between the two steam valves. Bleeder valve could help, when steam leaks or passing through closed valve.</p> | <p>In the design stage itself, eliminating the fire-prone heating media is an illustration of an in-built safe design. Here we have not gone for Electrical heaters or hot oil / thermic fluid-based heating, but chosen steam, which is an inherently safe media, from the angle of prevention of fire.</p> <p>Also, low pressure steam of less than 2.7 Bar G is employed in the limpet coil of the Distillation kettle, R-108. For controlling the steam pressure at below 2.7 Bar G, in the limpet coil to R-108, automatic steam pressure regulation valve (PRV) is provided in the steam header; In addition to PRV, a secondary control viz. a Safety Valve is provided, at the downstream of PRV, and it is set to open, if the steam pressure reaches 2.9 Bar G. Also, a tertiary safety control viz. another safety valve in the limpet coil of the distillation kettle is provided to ensure steam pressure inside the limpet coil not to exceed 3.0 Bar G. Thus, Kettle R-108 is already designed, with a three-fold safety protection, on steam heating.</p> <p>To monitor the temperature of the distillation mass, inside the reactor, Digital Display Resistance Temperature Detector (RTD) is provided. (Photo Annexure -1). For monitoring the pressure inside the distillation kettle, pressure gauge is provided.</p> <p>Bleeder Valve arrangement is not warranted, as temperature cannot go beyond the steam temperature and pressure of steam is already controlled and also kettle is under mild suction, through scrubber connected to ID fan.</p> |
| 1 (3) | <p><u>Section 87, Rule 95, Schedule XVI, Part III, sub part 6 & Section 41, Rule 61, E&F</u></p> <p>When the temperature of Reactor 108, goes above the designated operating</p> | <p>Kettle 108 is conned to a mild suction ID fan, post the condenser system. Under any situation, pressure of the reactor will not increase.</p> <p>We have designed the jacket system in which after the usage of steam i.e., when IPA recovery is completed, steam will be closed and if an emergency arises, we can switch over to cooling water and reduce the temperature</p> |



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| | <p>temperature, to prevent the decomposition of the Actamiprid filtrate and thereby to reduce the developed high pressure, no system was there, to stop the steam addition and inject the cooling water in order to get the heat soon lowered.</p> | <p>quickly. So, at the moment when our operator realized the emergency situation it was already became too late.</p> <p>In this case, an external trigger of seal oil leak and a mild but spontaneous blast occurred through the slight vapour leak through the minute gap of gasket of manhole lid. In fact, our A- shift engineer has observed the same and before he initiates to turn cooling water, this incident occurred.</p> |
| <p>1 (4)</p> | <p><u>Section 87, Rule 95, Schedule XVI, Part III, sub part 6 & Section 41, Rule 61, E&F</u></p> <p>Since IPA was present excessive in the Acetamiprid filtrate ML, as was not fully recovered in R 108 system compared to the specified level, and also leaky steam line increased the temperature thereby high pressure broken the manhole lid released chemical toxic fume.</p> | <p>Specified quantity of IPA had been completely recovered on the previous day night shift itself and hence batch was stopped and only collection of residue was planned for the next day.</p> <p>Passing / Leaky steam valve had not allowed the system to cool. Since the system is connected to suction blower, even if IPA present, it will be condensed in the condensers and non-condensable will be released through the scrubber. Might be the less tightened manhole lid or slight worn out of gasket, vapour breathing and leaky seal oil of about 4 litres, combined with an external trigger seems to be the cause to blast open the lid. Fire at incipient stage was aggravated due to hot splash of residue of about 180 to 200 Litres, over the paper bags, kept on the floor. These paper bags are made of outer paper and inner polythene coated developed more smoke, and the quantity of bags were about 40 - 50 Nos. Also, cold insulation material of the chilled water supply / return lines and hot insulation of R 108 started giving thick smoke, due to hot fallen residue material.</p> <p>Our employees suffocated might be due to smoke having combustion products resulted from the fire, from burnt seal oil, paper bags and cold insulation material of chilled water piping and hot insulation material of R 108. Such combustion products that result in any general fire accident, used to deplete oxygen concentration in air and to cause suffocation.</p> <p>It is understood that there was no chemical toxic fume leak; Also, no nearby resident got affected and no complaint was made by anyone.</p> |
| <p>2.</p> | <p><u>Section 41, Rule 61 M</u></p> <p>Safety Committee was not constituted as stated in this rule and also functions and duties of the committee were not carried out, as stipulated in sub section 7,</p> | <p>Safety committee has been already constituted comprising a senior official, Head Safety, representative from each function viz. production, maintenance, purchase departments and also representative from workers and quarterly meetings are conducted regularly. Minutes of Meeting are recorded (Recent minutes of Safety committee shown in Annexure - 2).</p> |



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| | | As per sub section (7), Safety Committee helps in improving the Safety awareness of employees, safety training, understanding management objectives / policy on safety, achieving practical solutions for identified problems in shop floor, safety audits, emergency and disaster management plans, implementation of safety suggestions, route cause analysis of accidents, corrective actions, and preventive measures, etc., |
| 3. | <p><u>Section 87, Rule 95, Schedule XVI, para 7</u></p> <p>Crimsun Organics Private Limited has not recorded and maintained specified Registers for documenting the monthly examination and testing of "Instrument and Safety devices" carried out by the competent person, approved by the Director, Industrial Safety and Health</p> | <p>Our "Instrument and Safety devices" testing and calibration practices are clearly written down and being carried out by both internal and external domain competent persons. A sample specimen of Hazard Identification & Risk Assessment (HIRA) Register is enclosed, (Annexure -3) and examination conducted by external Competent person is also enclosed (Annexure - 4)</p> <p>Also, Examination of devices used in the process are tested before taking into use and also after carrying out any repair, is done by approved competent person, depends on usage and based on seasonal product requirements from our end customers. (Annexure - 5).</p> |
| 4 | <p><u>Section 87, Rule 95, Schedule XVI, part II, para 15</u></p> <p>All parts of plant, equipment and machinery used in the process which in the likely event of their failure may give rise to emergent situation were not tested in an appropriate procedure by a competent person, before commencing the process and retested at an interval of two years.</p> <p>Also details of repairs being carried out and examination done once in a month, to such parts of plant, equipment, and machinery, after a failure that may give rise to an emergent situation, have not recorded in specified registers and shown during</p> | <p>Examination of all vessels including pressure vessels and wherever applicable hydro, pneumatic and ultrasonic tests are conducted by external competent persons, at the desired periodicity, in compliance with TN Factories Rules, 1950. (Annexure - 6)</p> <p>Notwithstanding the above examinations, any failed machinery is replaced with a new one and will be repaired, wherever possible. After such repair, depending on the safety impacts, all such equipment / machinery are put into stringent test, before lining for process use, for e.g., water run, nitrogen purge, pneumatic tests, etc.,. Such Records are perfectly maintained (Annexure - 7) and made available during inspection.</p> |



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| | periodical inspection carried out. | |
| 5. | <p><u>Section 87, Rule 95, Schedule XVI, para 23</u></p> <p>All possible emergencies that could occur in the processes during the course of work or while carrying out maintenance work or repair work have not been identified.</p> <p>To meet all such identified emergencies, No detailed plan has been formulated and submitted to the Director, Industrial Safety and Health.</p> <p>Emergency procedures were not rehearsed every three months and deficiencies, in the achievement of the objectives were not suitably corrected.</p> | <p>Possible emergencies are already identified, both related to process and maintenance. A list of Possible emergencies at COPL is shown in Annexure- 8.</p> <p>A detailed procedure on Onsite Emergency and Disaster Management was submitted on 1st September 2020 to the Deputy Director, IS&H, Cuddalore and awaiting approval. Our Disaster Management plan has been in line with the one, earlier released for SIPCOT , Cuddalore Plants, by the concerned authorities.</p> <p>Rehearsal of many Emergency mocks were conducted, and deficiencies are documented (Annexure – 9 for two mock drills); Of course, during this pandemic period since April 2020, we operate only with 50% of strength and could involve all available number of employees.</p> |
| 6. | <p><u>Section 88, Rule 96</u></p> <p>Details of Accident occurred on 13th May, 2021 were not informed immediately to Jt. Director, Industrial Safety & Health, Cuddalore and Director, Industrial Safety & Health, Chennai.</p> <p>For deceased employees, details in Form 18 , separately for each deceased employee were not sent within 12 hours of the accident.</p> <p>Also, individual Form 18 for injured employees were not sent.</p> | <p>We have sent the First Information Report of the Accident as per our letter dated 15.5.2021, both to Jt. Director, Industrial Safety & Health, Cuddalore and Director, Industrial Safety & Health, Chennai. More details are sent in our earlier responses.</p> <p>Individual Form 18 for each deceased employee were first sent through e-mail and subsequently sent the hard copies by courier.</p> <p>For the injured also, individual Form 18 have been sent.</p> |



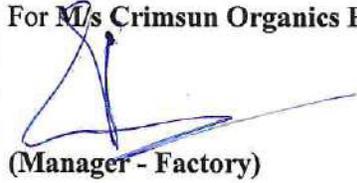
It is pertinent to mention here that the incident culminating the show cause notices are totally beyond our control and had resulted out of accidents over which we have no control notwithstanding the fact that we have built adequate safety devices for ensuring safe operation of the plant. The contents of our above reply will bring out the factual position.

After the above incident, we have further strengthened our plant system, taking into consideration of directions given by your department and implemented the same. We would like to submit further that over and above what has been stipulated in the Factories Act and Rules made therein, we have taken extra precautions and we assure that such incidence will not happen in future.

We pray your Good Self, not to proceed for any legal action against us.

Thanking you.
Yours faithfully

For **M/s Crimsun Organics Private Limited**



(Manager - Factory)

Cc: Additional Director, IS&H, Trichy

Encl: All Annexures, as stated



ANNEXURE-L (COLLY.)

தொழிலக பாதுகாப்பு மற்றும் சுகாதார இணை இயக்குநர் அலுவலகம்,கடலூர்

அனுப்புநர்
திரு.ரெ.சித்தார்த்தன்,எம்.இ.,எம்.பி.ஏ.,டி.ஐ.எச்.,
இணை இயக்குநர்,
தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம்,
கடலூர் (மு.கூ.பொ)

பெறுநர்
திரு.எஸ்.ரமேஷ் பிரபாகரன்,(வயது-53)
உரிமையாளர்,
கிரிம்சன் ஆர்கானிக்ஸ்
பிரைவேட் லிமிடெட்,
பிளாட் எண்.சி9,சி10,சி11, சிப்காட்,
குடிக்காடு, கடலூர் மாவட்டம்.

ந.க.எண்.ஆ/905/2021, நாள்: 09.06.2021

ஐயா,

பொருள்: வாயு கசிவு / மரணவிபத்து - கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட், பிளாட் எண்.சி9,சி10,சி11, சிப்காட், குடிக்காடு, கடலூர் மாவட்டம் என்ற தொழிற்சாலையில் 13.05.2021 அன்று முற்பகல் 07.40 மணியளவில் வாயு கசிவு ஏற்பட்டு 04 தொழிலாளர்கள் மரணமடைந்தது மற்றும் 12 தொழிலாளர்கள் காயமடைந்தது தொடர்பாக-இழப்பீடு மற்றும் இதர விவரங்கள் கோருதல் தொடர்பாக.

பார்வை 13.05.2021 தேதிய விபத்து.

கிரிம்சன் ஆர்கானிக்ஸ் பிரைவேட் லிமிடெட், பிளாட் எண்.சி9,சி10,சி11, சிப்காட், குடிக்காடு, கடலூர் மாவட்டம் என்ற தொழிற்சாலையில் 13.05.2021 அன்று முற்பகல் 07.40 மணியளவில் ஏற்பட்ட விபத்து தொடர்பாக கீழ்க்காணும் விபரங்களை உடன் மூன்று நகல்களில் இவ்வலுவலகத்திற்கு அனுப்பி வைக்க கேட்டுக்கொள்ளப்படுகிறது.

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| 1. | 13.05.2021 தேதிய விபத்து குறித்த காவல் துறையினரின் முதல் தகவல் அறிக்கை. |
| 2. | மரணமடைந்த தொழிலாளர்களின் பிரேத பரிசோதனை அறிக்கைகள் (Attested copies) |
| 3. | காயமடைந்த தொழிலாளர்களின் காயசான்று மற்றும் மருத்துவமனை விடுவிப்பு சான்று (Discharge summary) |
| 4. | இழப்பீடு வழங்கப்பட்டதற்கான அத்தாட்சி (Cheque Bank Transfer etc) |
| 5. | விபத்தில் பாதிக்கப்பட்ட 16 தொழிலாளர்களின் ESI மற்றும் PF எண்கள் விபரம். |
| 6. | ESI மற்றும் PF அலுவலகங்களுக்கு விபத்து பற்றிய தகவல் உரிய படிவத்தில் அனுப்பப்பட்ட நகல். |
| 7. | விபத்து நடந்த பிறகு எடுக்கப்பட்ட கலர் புகைப்படம் நகல்கள். |
| 8. | பிற துறைகளால் எடுக்கப்பட்ட நடவடிக்கை /வழக்குகள் ஏதேனும் இருப்பின் அதன் விபரம். |

இணை இயக்குநர்.

தொழிலக பாதுகாப்பு மற்றும் சுகாதாரம்
கடலூர் (மு.கூ.பொ)

<<TRUE TYPED COPY>>

Office of the Joint Director of Industrial Safety and Health, Cuddalore.

From

Mr. R. Siddharthan, ME,MBA, DIH.,
Joint Director,
Industrial Safety and Health,
Cuddalore.

To

Mr.S.Ramesh Prabakaran,(Age53)
Owner,
Crimsun Organics Private Limited,
Plot No.C9, C10,011,
Sipcot Industrial Complex,
Kudikadu Village,
Cuddalore District.

C.A.No. A/ 905/2021 Date: 09.06.2021

Dear Sir,

Sub: Gas Leakage/ Accidental Death- The gas leakage that took place on 13-05-2021 in M/s. crimson Organic Pvt. Ltd set up at SIPCOT Industrial Estate, Plot No: C9,C10 & C11, Kudikadu Village, Cuddalore District at 7.40 pm, in which 4 people lost their life and 12 employees were injured, requesting for compensation and other details-regarding:-

Ref: Accident Dated 13-05-2021

Regarding the accident that occurred on 13-05-2021, in M/s. crimson Organic Pvt. Ltd set up at SIPCOT Industrial Estate, Plot No: C9,C10 & C11, Kudikadu Village, Cuddalore District at 7.40 pm, you have asked to submit the reply for the below questions in triplicate copies to the above mentioned office address

| | |
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| 1 | Police station's First Information Report about the national accident dated 13-05-2021 |
| 2 | post-mortem reports of the deceased employees (Attested copies) |

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| 3 | Detailed Copy of the injuries incurred to the employees and Discharge summary from the hospital |
| 4 | Proof of compensation given to the victims (Cheque, Bank transfer etc.) |
| 5 | Details of ESI and PF numbers of the affected employees |
| 6 | Copy of the accident details submitted in a valid form to ESI and PF offices |
| 7 | Colour phtotos taken after the accident |
| 8 | The details actions taken / case filed if any any other departments |

sd// 09-06-2021

Joint Director,

Industrial Safety and Health
Cuddalore.

COPL / HRD / ISH / 2021-22/003

The Joint Director
Industrial Safety & Health
Cuddalore

Dear Sir,

Sub: The Factories Act, 1948 (Amended Act 1987), Tamil Nadu Factory Rules, 1950- Crimsun Organics Private Limited, – Accident dated 13.05.2021- Details of Compensation awarded to Accident Victims and other details – reg

Ref: Your Letter A/ 905 / 2021, dt 09.06.2021

We are in receipt of your above referred letter on 11th June, 2021 and the following details are given in triplicate. in the respective Annexures.

1. FIR issued by Cuddalore Police (**Annexure -1**)
2. Attested copies of Post-mortem Reports of the deceased (**Annexure -2**)
3. Injury and discharge certificates of the injured persons (**Annexure -3**)
4. Proof for compensation awarded (**Annexure -4**)
5. Details of ESI No. and EPF No. of the deceased (**Annexure -5**)
6. Copies of appropriate forms sent by COPL to ESI office and EPF office on intimation of accident. (**Annexure -6**)
7. Copies of colour photos taken, after the accident. (**Annexure -7**)
8. No actions / litigation were initiated, by any other statutory bodies, other than Directorate of Industrial Safety and Health and Cuddalore Superintendent of Police.

Thanking you.

Yours faithfully

For M/s Crimsun Organics Private Limited



S Ramesh Prabakaran

(Occupier & Managing Director)



S. Ramesh Prabakaran
24/6/21
OFFICE OF THE JOINT DIRECTOR
INDUSTRIAL SAFETY AND HEALTH
CUDDALORE

சென்னை தொழிலகபாதுகாப்பு மற்றும் சுகாதாரஇயக்குநர் (மு.கூ.பொ) அவர்களின்
செயல்முறைகள்

பிறப்பிப்பவர்: திரு. மு.வே. செந்தில்குமார், எம்.இ.,
சுருக்கம்

தொழிற்சாலைகள் சட்டம் மற்றும் விதிகள் - Crimson Organics Pvt Limited, Plot C9,10,11, Sipcot Industrial complex, kudikadu village, cuddalore Town, cuddalore Taluk, cuddalore District - என்ற தொழிற்சாலையில் கடலூர், தொழிலக பாதுகாப்பு மற்றும் சுகாதார இணை இயக்குநர் அவர்களால் தமது ஆய்வின் போது பிறப்பிக்கப்பட்ட, பிரிவு 40(2)ன் கீழான தடையாணை விலக்கக் கோரி தொழிற்சாலைகள் சட்டம் மற்றும் விதிகளின் பிரிவு 107-ன் கீழ் மேல்முறையீடு விண்ணப்பம் பெறப்பட்டது - தடையாணை விலக்கி செயல்முறை ஆணை வழங்கப்படுகிறது.

சி2 / 10381 / 2021

நாள்: 28.06.2021.

- படிக்கப்பட்டது: 1. கடலூர், தொழிலக பாதுகாப்பு மற்றும் சுகாதார இணை இயக்குநர் அவர்களின் தடையாணை எண்.இ/906/2021, நாள்.14.05.2021.
2. நிர்வாகத்தினரின் மேல்முறையீடு மனு நாள் 11.06.2021
3. திருச்சி, தொழிலகப் பாதுகாப்பு மற்றும் சுகாதார கூடுதல் இயக்குநர் அவர்களின் கடித எண்.ஆ/905/2021, நாள். 24.06.2021.

ஆணை:-

Crimson Organics Pvt Limited, Plot C9,10,11, Sipcot Industrial complex, kudikadu village, cuddalore Town, cuddalore Taluk, cuddalore District - என்ற தொழிற்சாலையில் 13.05.2021 தேதிய ஆய்வுகளின் போது காணப்பட்ட பாதுகாப்பு விதி மீறல்களைத் தொடர்ந்து கடலூர், தொழிலக பாதுகாப்பு மற்றும் சுகாதார இணை இயக்குநர் அவர்களால் இத்தொழிற்சாலையில் காணப்பட்ட முரண்பாடுகளை நிவர்த்தி செய்யும் நோக்கில் தொழிற்சாலைகள் சட்டம் மற்றும் விதிகளின் பிரிவு 40(2)-ன் கீழ் உற்பத்தி தடையாணை பிறப்பிக்கப்பட்டது.

மேலே 2-ல் படிக்கப்பட்ட மேல்முறையீட்டு விண்ணப்பத்தின் வாயிலாக தொழிற்சாலைகள் சட்டம் மற்றும் விதிகளின் பிரிவு 40(2) தடையாணையில் தெரிவிக்கப்பட்ட அனைத்து குறைபாடுகளையும் தற்போது நிவர்த்தி செய்துள்ளதாகவும், பாதுகாப்பாக உற்பத்தி பணியை மேற்கொள்ள அனைத்து நடவடிக்கைகளும் எடுக்கப்பட்டுள்ளதாகவும் தெரிவித்து மேற்படி தடையாணையினை விலக்கிட வேண்டி, நிர்வாகத்தினரின் மேல்முறையீட்டு விண்ணப்பம் பெறப்பட்டுள்ளது.

இவ்விண்ணப்பத்தின் மீது திருச்சி, தொழிலகப் பாதுகாப்பு மற்றும் சுகாதார கூடுதல் இயக்குநர் அவர்களால் 24.06.2021 அன்று ஆய்வு மேற்கொண்டு அளித்துள்ள குறிப்புரையின் அடிப்படையிலும், இத்தொழிற்சாலையில், தொழிற்சாலைகள் சட்டம் மற்றும் விதிகளின் பிரிவு 107-ன் கீழ் தமக்களிக்கப்பட்ட அதிகாரத்தின் கீழ் மேல்முறையீட்டு அதிகாரி என்பதன் அடிப்படையில் கடலூர், தொழிலக பாதுகாப்பு மற்றும் சுகாதார இணை இயக்குநர் அவர்களால் பிறப்பிக்கப்பட்ட உத்தரவினை பின்வரும் நிபந்தனைகளுக்குட்பட்டு நீக்கம் செய்து உற்பத்தி தொடர அனுமதிக்கப்படுகிறது. தடையாணை நீக்கி பிறப்பிக்கப்படும், இவ்வாணையில் குறிப்பிட்டுள்ள நிபந்தனைகள் கடைப்பிடிக்கப்படாவிடில் தடையாணை தானாகவே அமுலுக்கு வரும் என தெரிவிக்கப்படுகிறது.

நிபந்தனைகள் :

1. தொழிற்சாலைகள் சட்டம் 1948 மற்றும் தமிழ்நாடு தொழிற்சாலைகள் விதிகள் 1950-ல் வரையறுக்கப்பட்டுள்ள அனைத்து பாதுகாப்பு நடைமுறைகளும் பின்பற்றப்பட வேண்டும்.
2. இதே முரண்பாடுகள் மீண்டும் காணப்பட்டு தடையாணை வழங்கப்பட்டால் தடை நீக்கம் செய்ய மீண்டும் விண்ணப்பம் பெறப்பட்டால் அது பரிசீலிக்கப்படமாட்டாது.
3. தங்கள் தொழிற்சாலையில் மனித உயிருக்கு அல்லது பாதுகாப்பிற்கு உடனடி ஆபத்து ஏற்படாத வகையில் தொழிற்சாலையின் எந்தவொரு கட்டிடப் பகுதிகளையோ, வழிதடங்களையோ, இயந்திரங்களையோ, உற்பத்தி வளாகத்தின் எந்தவொரு பகுதியோ முறையாக பராமரிக்கப்படவேண்டும்.
4. தங்கள் தொழிற்சாலையில் அமைக்கப்பட்டுள்ள கருவிகள் மற்றும் சுகாதார பாதுகாப்பு உபகரணங்கள் (Instruments and safety devices) சென்னை, தொழிலகப் பாதுகாப்பு மற்றும் சுகாதார இயக்குநர் அவர்களால் அங்கீகரிக்கப்பட்ட தகுதி வாய்ந்த (Competent person) நபரால் மாதம் ஒருமுறை சோதனை செய்யப்பட்டு சோதனை விபரங்கள் பதிவேடுகளில் குறித்து பராமரிக்கப்பட்டு வரவேண்டும்.
5. தங்கள் தொழிற்சாலையில், ஆபத்து விளைவிக்க ஏதுவாக உள்ள அனைத்து plant, Equipment and Machinery முழுவதும், Process தொடங்குவதற்கு முன்னர் மற்றும் இரண்டு வருடங்களுக்கு ஒருமுறை சென்னை, தொழிலகப் பாதுகாப்பு மற்றும் சுகாதார இயக்குநர் அவர்களால் அங்கீகரிக்கப்பட்ட தகுதி வாய்ந்த (Competent person) நபரால் உரிய சோதனை செய்யப்படவேண்டும்.
6. The Solvent IPA shall be completely recovered from Acetamidrid M.L in the reactor vessel.
7. Residual Acetamidrid impurities shall be removed immediately after recovery of Solvent from Acetamidrid M.L and the vessel may be kept open and it shall be ensured that steam line is 'closed'.

இயக்குநர் (மு.கூ.பொ)
28/06/2024

தொழிலகப் பாதுகாப்பு மற்றும் சுகாதாரம்,
சென்னை-32.

பெறுநர் ✓

MR.Ramesh prabakaran. (Age 53),

S/O MR.Senthur Pandiyan,

Occupier,

Crimson Organics Pvt Limited,

Plot C9,10,11,

Sipcot Industrial complex,

kudikadu village, cuddalore Town,

cuddalore Taluk, cuddalore District.

நகல்

1. கூடுதல் இயக்குநர், தொழிலகப் பாதுகாப்பு மற்றும் சுகாதாரம், திருச்சி.
2. இணை இயக்குநர், தொழிலகப் பாதுகாப்பு மற்றும் சுகாதாரம், கடலூர்.
(மேற்குறிப்பிட்ட நிபந்தனைகள் கடைபிடிக்கப்படுகிறதா என்பதை அவ்வப்போது கண்காணிக்குமாறு அறிவுறுத்தப்படுகிறார்)
3. உதிரி.

<<TRUE TYPED COPY>>

Director of Industrial Safety and Health , Chennai

Procedures

Order issued by: Mr. M.V. Senthilkumar, M.E.,

In brief

.....

Industries Act and Rules - An appeal petition under Section 107 of the Factories Act and Rules has been received to remove the injunction order passed under Section 40(2) during the inspection by the Joint Director of Industrial Safety and Health, Tirunelveli, at the factory of Crimson Organics Pvt Limited, Plot C9,10,11, Sipcot Industrial complex, kudikadu village, cuddalore Town, cuddalore Taluk, cuddalore District - An order has been issued for removal of the injunction.

C2/10381/2021

Date: 28-06-2021

1. Joint Director of Industrial Safety and Health, Cuddalore, their injunction No. E/906/2021, Dated.14.05.2021. –
2. Appeal petition filed by the Company dated 11.06.2021
3. Additional Director of Industrial Safety and Health, Trichy, their Letter No.B/905/2021, dated 24.06.2021

Inspection taken after the accident at M/s.Crimson Organics Pvt Limited, Plot C9,10,11, Sipcot Industrial complex. kudikadu village, cuddalore Town, cuddalore Taluk, cuddalore by the Joint Director of Industrial Safety and Health, Cuddalore, it was found that the safety rules and procedures were not followed, so under section 40(2) of Factories Act, an injunction order was passed to stop the production in order to rectify the flaws.

In the above appeal as mentioned above in point no (2), the company has given an undertaking that all the shortcomings as mentioned in the injunction order passed under section 40(2) of Factories Act, have been rectified and safety measures has been strengthened, so the company has prayed for the removal of injunction order

The appeal was inspected and reviewed by the Additional Director of Industrial Safety and Health, Trichy on 24-06-2021 and based on his recommendations and being an appellate authority under the power conferred under Section 107 of this Factory and Rules, the injunction order passed by The Director of Industrial Safety and Health, cuddalore, that is refraining the company from the production is being withdrawn and the company has been asked to start the production under the following conditions. If

the conditions specified in this order are not adhered to, the withdrawal stands cancelled and the injunction will automatically come into force.

Conditions:

1. All safety procedures as laid down in the Factories Act, 1948 and the Tamil Nadu Factories Rules, 1950 Should be followed strictly.
2. If the same violations are found again and an injunction is issued, if an appeal petition is received again for the removal of the injunction, the same will not be considered.
3. The factory building and machinery should be maintained properly so that it will endanger the safety and security of the employees working in the factory
4. Instruments and safety devices in the factory should be inspected once in a month by a qualified person (Competent person) approved by the Director of Industrial Safety and Health, Chennai and the same has to be recorded and the register is to be maintained.
5. , Equipment and machinery should be inspected before the start of the process every day and once in two years by a qualified person (competent person) approved by the Director, Industry Safety and Health.
6. The Solvent IPA shall be completely recovered from Acetamiprid M.L in the reactor vessel.
7. Residual Acetamiprid impurities shall be removed immediately after recovery of Solvent from Acetamiprid M.L and the vessel may be kept open and it shall be ensured that steam line is 'closed'.

Sd// (28-06-2021)

Director,

Industrial Safety and Health,

Chennai-32

To

MR.Ramesh prabakaran. (Age 53).

S/O MR.Senthur Pandiyan,

Occupier,

Crimsun Organics Pvt Limited

Plot C9,10,11,
Sipcot Industrial complex,
kudikadu village, cuddalore Town,
cuddalore Taluk, cuddalore District.

Copy to

1. Additional Director, Industrial Safety and Health, Trichy
2. Joint Director, Industrial Safety and Health, Cuddalore

(It is advised to monitor from time to time whether the above conditions are adhered to)

3. Others

ANNEXURE-N (COLLY.)

Category of the Industry :

RED**CONSENT ORDER NO. 2105237225613 DATED: 29/11/2021.****PROCEEDINGS NO.T6/TNPCB/F.0616CUD/RL/CUD/A/2021 DATED: 29/11/2021**

SUB: Tamil Nadu Pollution Control Board –CONSENT TO OPERATE –DIRECT –M/s. CRIMSUN ORGANICS PRIVATE LIMITED , S.F.No. SF No. 138/1, 138, 137 of Plot No C-9, C-10, C-11, SIPCOT Industrial Complex, KUDIKADU villageCuddalore Taluk and Cuddalore District - Consent for operation of the plant and discharge of emissions under Section 21 of the Air (Prevention and Control of Pollution) Act, 1981 as amended in 1987 (Central Act 14 of 1981) –Issued- Reg.

Ref: 1. Units application dt. 17.03.2021
2. IR.No : F.0616CUD/RL/JCEE-M/CUD/2021 dated 08/06/2021
3. Board's (Technical Sub Committee) Resolution No.188-17 dt: 17.11.2021

CONSENT TO OPERATE is hereby granted under Section 21 of the Air (Prevention and Control of Pollution) Act, 1981 as amended in 1987 (Central Act 14 of 1981) (hereinafter referred to as "The Act") and the rules and orders made there under to

The Managing Director,
M/s . CRIMSUN ORGANICS PRIVATE LIMITED
S.F No.SF No. 138/1, 138, 137 of Plot No C-9, C-10, C-11, SIPCOT Industrial Complex,
KUDIKADU Village,
Cuddalore Taluk,
Cuddalore District.

Authorizing the occupier to operate the industrial plant in the Air Pollution Control Area as notified by the Government and to make discharge of emission from the stacks/chimneys.

This is subject to the provisions of the Act, the rules and the orders made there under and the terms and conditions incorporated under the Special and General conditions stipulated in the Consent Order issued earlier and subject to the special conditions annexed.

This CONSENT is valid for the period ending March 31, 2024

**For Member Secretary,
Tamil Nadu Pollution Control Board,
Chennai**

To
The Managing Director,
M/s.CRIMSUN ORGANICS PRIVATE LIMITED,
C-9, C-10 & C-11, SIPCOT Industrial Complex,
Kudikadu Village,
Cuddalore District.,
Pin: 607005

Copy to:

1. The Commissioner, CUDDALORE-Panchayat Union, Cuddalore Taluk, Cuddalore District .
2. The District Environmental Engineer, Tamil Nadu Pollution Control Board, CUDDALORE.
3. The JCEE-Monitoring, Tamil Nadu Pollution Control Board, Triuchirappalli.
4. File

SPECIAL CONDITIONS

1. This consent to operate is valid for operating the facility for the manufacture of products (Col. 2) at the rate (Col. 3) mentioned below. Any change in the products and its quantity has to be brought to the notice of the Board and fresh consent has to be obtained.

| Sl. No. | Description | Quantity | Unit |
|------------------------|--------------------------------|----------|------|
| Product Details | | | |
| 1. | Para chloro benzyl cyanide | 20 | TPM |
| 2. | Pyrazole | 20 | TPM |
| 3. | Metaphenoxy Benzaldehyde (MPB) | 30 | TPM |
| 4. | Thiophanate Methyl | 50 | TPM |
| 5. | Hexaconazole | 30 | TPM |
| 6. | Propiconazole | 30 | TPM |
| 7. | Azoxystrobin | 15 | TPM |
| 8. | Isoprothiolane | 50 | TPM |
| 9. | Carbendazim | 50 | TPM |
| 10. | Cyproconazole | 30 | TPM |
| 11. | Trifloxystrobin | 20 | TPM |
| 12. | Cymoxanil | 20 | TPM |
| 13. | Pyraclostrobin | 20 | TPM |
| 14. | Metalaxyl | 20 | TPM |
| 15. | Tebuconazole | 20 | TPM |
| 16. | Boscalid | 20 | TPM |
| 17. | Picoxystrobin | 20 | TPM |
| 18. | Thifluzamide | 20 | TPM |
| 19. | Pretilachlor | 50 | TPM |
| 20. | Metamifop | 50 | TPM |
| 21. | Clodinafop-propargyl | 20 | TPM |
| 22. | Bispyribac-Sodium | 20 | TPM |
| 23. | Oxadiargyl | 20 | TPM |
| 24. | Propaquizafop | 20 | TPM |
| 25. | Mesotrione | 20 | TPM |
| 26. | Fluroxypyr | 20 | TPM |
| 27. | Imazamox | 30 | TPM |
| 28. | Pinoxaden | 30 | TPM |
| 29. | Ametryn | 30 | TPM |
| 30. | Tembotrione | 20 | TPM |
| 31. | Topramezone | 20 | TPM |
| 32. | Pyroxasulfone | 20 | TPM |
| 33. | Penoxsulam | 20 | TPM |
| 34. | Flazasulfuron | 20 | TPM |
| 35. | Pendimethalin | 30 | TPM |
| 36. | Chlorimuron | 20 | TPM |
| 37. | Nicosulfuron | 20 | TPM |
| 38. | Metsulfuron | 20 | TPM |
| 39. | Prothiconazole | 30 | TPM |
| 40. | Chlorpyrifos | 30 | TPM |
| 41. | Imidacloprid | 30 | TPM |

| | | | |
|---------------------------|---------------------|-------|-----|
| 42. | Buprofezin | 30 | TPM |
| 43. | Thiamethoxam | 30 | TPM |
| 44. | Pyriproxyfen | 30 | TPM |
| 45. | Profenofos | 20 | TPM |
| 46. | Fipronil | 20 | TPM |
| 47. | Acetamiprid | 30 | TPM |
| 48. | Propargite | 30 | TPM |
| 49. | Indoxacarb | 20 | TPM |
| 50. | Dinotefuran | 20 | TPM |
| 51. | Flonicamid | 20 | TPM |
| 52. | Pymetrozine | 20 | TPM |
| 53. | Bifenthrin | 20 | TPM |
| 54. | Spiromesifen | 20 | TPM |
| 55. | Lambdacyhalothrin | 20 | TPM |
| 56. | Chlorantraniliprole | 20 | TPM |
| 57. | Sulfoxaflor | 20 | TPM |
| By-Product Details | | | |
| 1. | Aq. HBr Solution | 11.72 | TPM |
| 2. | Ethanol | 2.96 | TPM |
| 3. | Methanol | 1.78 | TPM |
| 4. | Methyl chloride (g) | 2.32 | TPM |
| 5. | Paraffin | 1.1 | TPM |

2. This consent to operate is valid for operating the facility with the below mentioned emission/noise sources along with the control measures and/or stack. Any change in the emission source/control measures/change in stack height has to be brought to the notice of the Board and fresh consent/Amendment has to be obtained.

| I Point source emission with stack : | | | | |
|---|---|---------------------------------------|--|---|
| Stack No. | Point Emission Source | Air pollution Control measures | Stack height from Ground Level in m | Gaseous Discharge in Nm³/hr |
| 1 | Oil Fired Boiler 3 TPH | Stack | 25 | 8240.616 |
| 2 | DG 500 KVA | Acoustic enclosures with stack | 9 | 3078.5738 |
| 3 | Reactors (14 Nos.) | Wet scrubber with stack | 25 | 8647.56 |
| 4 | Reactors (8 Nos. out of 14) | Vent Scrubber with Stack | 25 | 300 |
| 5 | DG Set 104 KVA (Fire Fighting Water Pump) | Stack | 7.5 | 615 |
| II Fugitive/Noise emission : | | | | |
| Sl. No. | Fugitive or Noise Emission sources | Type of emission | Control measures | |
| 1. | DG Set | Noise | Inbuilt acoustic enclosures | |

- 3(a). The emission shall not contain constituents in excess of the tolerance limits as laid down hereunder :

| Sl. | Parameter | Unit | Tolerance limits | Stacks |
|------------|------------------|-------------|-------------------------|---------------|
|------------|------------------|-------------|-------------------------|---------------|

Annexure enclosed if applicable. :-

3.(b) The Ambient Air in the industrial plant area shall not contain constituents in excess of the tolerance limits prescribed below.

| Sl. No. | Pollutant | Time Weighted Average | Unit | Tolerance Limits | |
|---------|--|-----------------------|--|---|---|
| | | | | Industrial, Residential, Rural and other area | Ecologically Sensitive Area (notified by Central Govt.) |
| 1. | Sulphur Dioxide (SO ₂) | Annual 24 hours | microgram/m ³ microgram/m ³ | 50 80 | 20 80 |
| 2. | Nitrogen Dioxide (NO ₂) | Annual 24 hours | microgram/m ³ microgram/m ³ | 40 80 | 30 80 |
| 3. | Particulate Matter (Size Less than 10 micro M) or PM ₁₀ | Annual 24 hours | microgram/m ³ microgram/m ³ | 60 100 | 60 100 |
| 4. | Particulate Matter (Size Less than 2.5 micro M) or PM _{2.5} | Annual 24 hours | microgram/m ³ microgram/m ³ | 40 60 | 40 60 |
| 5. | Ozone (O ₃) | Annual 24 hours | 8 Hours 1 Hour | 100 180 | 100 180 |
| Sl. No. | Pollutant | Time Weighted Average | Unit | Tolerance Limits | |
| | | | | Industrial, Residential, Rural and other area | Ecologically Sensitive Area (notified by Central Govt.) |
| 6. | Lead (Pb) | Annual 24 hours | microgram/m ³ microgram/m ³ | 0.5 1.0 | 0.5 1.0 |
| 7. | Carbon Monoxide (CO) | 8 Hours 1 Hour | miligram/m ³ miligram/m ³ | 02 04 | 02 04 |
| 8. | Ammonia (NH ₃) | Annual 24 hours | microgram/m ³ microgram/m ³ | 100 400 | 100 400 |
| 9. | Benzene (C ₆ H ₆) | Annual | microgram/m ³ | 5 | 5 |
| 10. | Benzo(O) Pyrene (BaP) –particulate phase only | Annual | nanogram/m ³ | 01 | 01 |
| 11. | Arsenic (As) | Annual | nanogram/m ³ | 06 | 06 |
| 12. | Nickel (Ni) | Annual | nanogram/m ³ | 20 | 20 |

3(c) The Ambient Noise Level in the industrial plant area shall not exceed the limits prescribed below:

| Limits in L.eq.-dB(A) | Day Time | Night Time |
|------------------------|-----------|------------|
| Industrial Area | 75 | 70 |

- All units of the Air pollution control measures shall be operated efficiently and continuously so as to achieve the standards prescribed in Sl. No.3 above.
- The occupier shall not change or alter quality or quantity or the rate of emission or replace or alter the air pollution control equipment or change the raw material or manufacturing process resulting in change in quality and/or quantity of emissions without the previous written permission of the Board.

6. The occupier shall maintain log book regarding the stack monitoring system or operation of the plant or any other particulars for each of the unit operations of air pollution control systems to reflect the working condition which shall be furnished for verification of the Board officials during inspection.
7. The occupier shall at his own cost get the samples of emission/air/noise levels collected and analyzed by the TNPC Board Laboratory once in every 6 months/once in a year/periodically for the parameters as prescribed.
8. Any upset condition in any of the plants of the factory which is likely to result in increased emissions and result in violation of the standards mentioned in Sl.No.3 shall be reported to the Member Secretary / Joint Chief Environmental Engineer-Monitoring and the concerned District/Assistant Environmental Engineer of the Board by e-mail immediately and subsequently by Post with full details of such upset condition.
9. The occupier shall always comply and carryout the order/directions issued by the Board in this Consent Order and from time to time without any negligence. The occupier shall be liable for action as per provisions of the Act in case of non compliance of any order/directions issued.

Special Additional Conditions:

The unit shall install the approved retrofit emission control device/equipment with at least 70% Particulate matter reduction efficiency on all DG sets with capacity of 125 KVA and above or otherwise the unit shall be shift to gas based generators within the time frame prescribed in the notification No. TNPCB/Labs/DD(L)02151/2019 dated 10.06.2020 issued by TNPCB.

Additional Conditions:

1. The unit shall operate and maintain the air pollution control measures efficiently and continuously so as to satisfy the NAAQ /Emission standards prescribed by the MoEF&CC.
2. The unit shall adhere to the Ambient Noise Level standards prescribed by the Board.
3. The unit shall conduct AAQ/Emission/ANL survey through Board lab and furnish report to the Board.
4. The unit shall provide Online continuous Ambient Air Quality Monitoring stations at required places for TVOC, PM10, PM2.5, SO2, NOx, and provide proper data to Care Air Centre, TNPCB, Guindy all the times.
5. The unit shall operate and maintain the safety measures and APC measures provided to arrest the fugitive emissions during its loading, unloading and handling operations.
6. The unit shall ensure the connectivity of Stack emission Online Monitoring system provided for PM attached to the stack of boiler to TNPCB server and CPCB server.
7. The unit shall maintain stack monitoring facility as per Emission Regulation Part-3 (ERP-3) norms for all the stacks attached with emissions sources.
8. The unit shall ensure that the port hole and ladder facility is safe to carry out monitoring. In place of monkey ladder, spiral type/scaffold ladder shall be provided to ensure safety of monitoring personnel.
9. The unit shall continue to develop adequate green belt with thick canopy cover within the premises, so as to attenuate air and noise pollution and furnish the exact green belt area ear marked/developed as per norms in the unit premises and furnish photographs along with latitude and longitude co-ordinates.
10. The unit shall be liable to pay the consent fee and shall remit the difference in amount in case of any revision of consent fee by the Government.
- 11 The unit shall monitor all the parameters like HCl, Cl2, H2S, NH3, pesticide particles, HBr, etc. for which emission standards are prescribed in reactor emission.
- 12 The unit shall provide VOC adsorption towers for the control of VOC emission from the reactors.

**For Member Secretary,
Tamil Nadu Pollution Control Board,
Chennai**

GENERAL CONDITIONS

1. The occupier shall make an application along with the prescribed consent fee for grant of renewal of consent at least 60 days before the date of expiry of this Consent Order along with all the required particulars ensuring that there is no change in production quantity and emission.
2. This Consent is given by the Board in consideration of the particulars given in the application. Any change or alteration or deviation made in actual practice from the particulars furnished, in the application will also be ground for review/variation/revocation of the Consent Order under Section 21 of the Act.
3. The conditions imposed shall continue in force until revoked under Section 21 of the Act.
4. After the issue of this order, all the 'Consent to Operate' orders issued previously under Air (Prevention and Control of Pollution) Act, 1981 as amended stands defunct.
5. The occupier shall maintain an Inspection Register in the factory so that the inspecting officer shall record the details of the observations and instructions issued to the unit at the time of inspection for adherence.
6. The occupier shall provide and maintain an alternate power supply along with separate energy meter for the Air Pollution Control measures sufficient to ensure continuous operation of all pollution control equipments to ensure compliance.
7. The occupier shall provide all facilities to the Board officials for collection of samples in and around the factory at any time.
8. The applicant shall display the flow diagram of the sources of emission and pollution control systems provided at the site.
9. The liquid effluent arising out of the operation of the air pollution control equipment shall also be treated in a manner and to the satisfaction of standards prescribed by the Board in accordance with the provisions of Water (Prevention and Control of Pollution) Act, 1974 as amended.
10. The air pollution control equipments, location of inspection chambers and sampling port holes shall be made easily accessible at all time.
11. In case of any episodal discharge of emission, the industry shall take immediate action to bring down the emission within the limits prescribed by the Board.
12. If applicable, the occupier has to comply with the provisions of Public Liability Insurance Act, 1991 to provide immediate relief in the event of any hazard to human beings, other living creatures/plants and properties while handling and storage of hazardous substances.
13. The issuance of this consent does not authorize or approve the construction of any physical structures or facilities or the undertaking of any work in any natural watercourse or in Government Poromboke lands.
14. The issuance of this Consent does not convey any property right in either real personal property or any exclusive privileges, nor does it authorize any injury to private property or Government property or any invasion of personal rights nor any infringement of Central, State laws or regulation.
15. The occupier shall forth with keep the Board informed of any accident of unforeseen act or event of any poisonous, noxious or polluting matter or emissions are being discharged into stream or well or air as a result of such discharge, water or air is being polluted.
16. If due to any technological improvements or otherwise the Board is of opinion that all or any of the conditions referred to above requires variation (including the change of any treatment system, either in whole or in part) the Board shall, after giving the applicant an opportunity of being heard, vary all or any of such conditions and thereupon the applicant shall be bound to comply with the conditions as so varied.
17. In case there is any change in the constitution of the management, the occupier of the new management shall file fresh application under Air (Prevention and Control of Pollution) Act, 1981, as amended in Form-I alongwith relevant documents of change of management immediately and get the necessary amendment with renewal of consent order.
18. In case there is any change in the name of the company alone, the occupier shall inform the same with relevant documents immediately and get the necessary amendments for the change of name from the Board.

19. The occupier shall display this consent order granted to him in a prominent place for perusal of the inspecting Officers of this Board.

**For Member Secretary,
Tamil Nadu Pollution Control Board,
Chennai**

Category of the Industry :

RED

CONSENT ORDER NO. 2105137225613 DATED: 29/11/2021.

PROCEEDINGS NO.T6/TNPCB/F.0616CUD/RL/CUD/W/2021 DATED: 29/11/2021

SUB: Tamil Nadu Pollution Control Board –CONSENT TO OPERATE – DIRECT -M/s. CRIMSUN ORGANICS PRIVATE LIMITED , S.F.No. SF No. 138/1, 138, 137 of Plot No C-9, C-10, C-11, SIPCOT Industrial Complex, KUDIKADU villageCuddalore Taluk and Cuddalore District - Consent for the operation of the plant and discharge of sewage and/or trade effluent under Section 25 of the Water (Prevention and Control of Pollution) Act, 1974 as amended in 1988 (Central Act 6 of 1974) – Issued- Reg.

Ref: 1. Units application dt. 17.03.2021
2. IR.No : F.0616CUD/RL/JCEE-M/CUD/2021 dated 08/06/2021
3. Board's (Technical Sub Committee) Resolution No.188-17 dt: 17.11.2021

CONSENT TO OPERATE is hereby granted under Section 25 of the Water (Prevention and Control of Pollution) Act, 1974 as amended in 1988 (Central Act, 6 of 1974) (hereinafter referred to as "The Act") and the rules and orders made there under to

The Managing Director,
M/s . CRIMSUN ORGANICS PRIVATE LIMITED
S.F No.SF No. 138/1, 138, 137 of Plot No C-9, C-10, C-11, SIPCOT Industrial Complex,
KUDIKADU Village,
Cuddalore Taluk,
Cuddalore District.

Authorising the occupier to make discharge of sewage and /or trade effluent.

This is subject to the provisions of the Act, the rules and the orders made there under and the terms and conditions incorporated under the Special and General conditions stipulated in the Consent Order issued earlier and subject to the special conditions annexed.

This CONSENT is valid for the period ending March 31, 2024

**For Member Secretary,
Tamil Nadu Pollution Control Board,
Chennai**

To
The Managing Director,
M/s.CRIMSUN ORGANICS PRIVATE LIMITED,
C-9, C-10 & C-11, SIPCOT Industrial Complex,
Kudikadu Village,
Cuddalore District.,
Pin: 607005

Copy to:

1. The Commissioner, CUDDALORE-Panchayat Union, Cuddalore Taluk, Cuddalore District .
2. The District Environmental Engineer, Tamil Nadu Pollution Control Board, CUDDALORE.
3. The JCEE-Monitoring, Tamil Nadu Pollution Control Board, Triuchirappalli.
4. File

SPECIAL CONDITIONS

1. This consent to operate is valid for operating the facility for the manufacture of products (Col. 2) at the rate (Col. 3) mentioned below. Any change in the products and its quantity has to be brought to the notice of the Board and fresh consent has to be obtained.

| Sl. No. | Description | Quantity | Unit |
|------------------------|--------------------------------|----------|------|
| Product Details | | | |
| 1. | Para chloro benzyl cyanide | 20 | TPM |
| 2. | Pyrazole | 20 | TPM |
| 3. | Metaphenoxy Benzaldehyde (MPB) | 30 | TPM |
| 4. | Thiophanate Methyl | 50 | TPM |
| 5. | Hexaconazole | 30 | TPM |
| 6. | Propiconazole | 30 | TPM |
| 7. | Azoxystrobin | 15 | TPM |
| 8. | Isoprothiolane | 50 | TPM |
| 9. | Carbendazim | 50 | TPM |
| 10. | Cyproconazole | 30 | TPM |
| 11. | Trifloxystrobin | 20 | TPM |
| 12. | Cymoxanil | 20 | TPM |
| 13. | Pyraclostrobin | 20 | TPM |
| 14. | Metalaxyl | 20 | TPM |
| 15. | Tebuconazole | 20 | TPM |
| 16. | Boscalid | 20 | TPM |
| 17. | Picoxystrobin | 20 | TPM |
| 18. | Thifluzamide | 20 | TPM |
| 19. | Pretilachlor | 50 | TPM |
| 20. | Metamifop | 50 | TPM |
| 21. | Clodinafop-propargyl | 20 | TPM |
| 22. | Bispyribac-Sodium | 20 | TPM |
| 23. | Oxadiargyl | 20 | TPM |
| 24. | Propaquizafop | 20 | TPM |
| 25. | Mesotrione | 20 | TPM |
| 26. | Fluroxypyr | 20 | TPM |
| 27. | Imazamox | 30 | TPM |
| 28. | Pinoxaden | 30 | TPM |
| 29. | Ametryn | 30 | TPM |
| 30. | Tembotrione | 20 | TPM |
| 31. | Topramezone | 20 | TPM |
| 32. | Pyroxasulfone | 20 | TPM |
| 33. | Penoxsulam | 20 | TPM |
| 34. | Flazasulfuron | 20 | TPM |
| 35. | Pendimethalin | 30 | TPM |
| 36. | Chlorimuron | 20 | TPM |
| 37. | Nicosulfuron | 20 | TPM |
| 38. | Metsulfuron | 20 | TPM |
| 39. | Prothiconazole | 30 | TPM |
| 40. | Chlorpyrifos | 30 | TPM |
| 41. | Imidacloprid | 30 | TPM |

| | | | |
|---------------------------|---------------------|-------|-----|
| 42. | Buprofezin | 30 | TPM |
| 43. | Thiamethoxam | 30 | TPM |
| 44. | Pyriproxyfen | 30 | TPM |
| 45. | Profenofos | 20 | TPM |
| 46. | Fipronil | 20 | TPM |
| 47. | Acetamiprid | 30 | TPM |
| 48. | Propargite | 30 | TPM |
| 49. | Indoxacarb | 20 | TPM |
| 50. | Dinotefuran | 20 | TPM |
| 51. | Flonicamid | 20 | TPM |
| 52. | Pymetrozine | 20 | TPM |
| 53. | Bifenthrin | 20 | TPM |
| 54. | Spiromesifen | 20 | TPM |
| 55. | Lambdacyhalothrin | 20 | TPM |
| 56. | Chlorantraniliprole | 20 | TPM |
| 57. | Sulfoxaflor | 20 | TPM |
| By-Product Details | | | |
| 1. | Aq. HBr Solution | 11.72 | TPM |
| 2. | Ethanol | 2.96 | TPM |
| 3. | Methanol | 1.78 | TPM |
| 4. | Methyl chloride (g) | 2.32 | TPM |
| 5. | Paraffin | 1.1 | TPM |

2. This consent to operate is valid for operating the facility with the below mentioned permitted outlets for the discharge of sewage/trade effluent. Any change in the outlets and the quantity has to be brought to the notice of the Board and fresh consent has to be obtained.

| Outlet No. | Description of Outlet | Maximum daily discharge in KLD | Point of disposal |
|---------------------------------------|--------------------------------|--------------------------------|----------------------------------|
| Effluent Type : Sewage | | | |
| 1. | Treated Sewage Water | 18.0 | Green Belt Development/Gardening |
| Effluent Type : Trade Effluent | | | |
| 1. | Trade effluent-1 (RO Permeate) | 72.31 | Recycling to process |
| 2. | Trade effluent-II (RO reject) | 14.69 | Evaporator |
| 3. | Trade effluent-3 (ETP) | 0.47 | Evaporation Loss |
| 4. | Trade effluent -4 ETP | 0.1 | TSDf along with sludge |

3. The effluent discharge shall not contain constituents in excess of the tolerance Limits as laid down hereunder.

| Sl. No. | Parameters | Unit | TOLERANCE LIMITS - OUTLETS -Nos | | | | |
|---------|--|----------------|---------------------------------|--|--|--|--|
| | | | Sewage | | Trade Effluent | | |
| | | | 1 | | 1 | 2 | 3,4 |
| 1. | pH | | 5.5 to 9 | | 5.5 to 9 | 5.5 to 9 | 5.5 to 9 |
| 2. | Temperature | oC | - | | shall not exceed 5°C above the receiving water temperature | shall not exceed 5°C above the receiving water temperature | shall not exceed 5°C above the receiving water temperature |
| 3. | Particle size of Suspended solids | - | - | | shall pass 850 micron IS sieve | shall pass 850 micron IS sieve | shall pass 850 micron IS sieve |
| 4. | Total Suspended Solids | mg/l | 30 | | 100 | 100 | 100 |
| 5. | Total Dissolved solids (inorganic) | mg/l | - | | 2100 | 2100 | 2100 |
| 6. | Oil & Grease | mg/l | - | | 10 | 10 | 10 |
| 7. | Biochemical Oxygen Demand (3 days at 27oC) | mg/l | 20 | | 30 | 30 | 30 |
| 8. | Chemical Oxygen Demand | mg/l | - | | 250 | 250 | 250 |
| 9. | Chloride (as Cl) | mg/l | - | | 1000 | 1000 | 1000 |
| 10. | Sulphates (as SO4) | mg/l | - | | 1000 | 1000 | 1000 |
| 11. | Total Residual Chlorine | mg/l | - | | 1 | 1 | 1 |
| 12. | Ammonical Nitrogen (as N) | mg/l | - | | 50 | 50 | 50 |
| 13. | Total Kjeldahl Nitrogen (as N) | mg/l | - | | 100 | 100 | 100 |
| 14. | Free Ammonia (as NH3) | mg/l | - | | 5 | 5 | 5 |
| 15. | Arsenic (as As) | mg/l | - | | 0.2 | 0.2 | 0.2 |
| 16. | Mercury (as Hg) | mg/l | - | | 0.01 | 0.01 | 0.01 |
| 17. | Lead (as Pb) | mg/l | - | | 0.1 | 0.1 | 0.1 |
| 18. | Cadmium(as Cd) | mg/l | - | | 2 | 2 | 2 |
| 19. | Hexavalent Chromium (as Cr+6) | mg/l | - | | 0.1` | 0.1` | 0.1` |
| 20. | Total Chromium (as Cr) | mg/l | - | | 2 | 2 | 2 |
| 21. | Copper (as Cu) | mg/l | - | | 3 | 3 | 3 |
| 22. | Zinc (as Zn) | mg/l | - | | 1 | 1 | 1 |
| 23. | Selenium (as Se) | mg/l | - | | 0.05 | 0.05 | 0.05 |
| 24. | Nickel (as Ni) | mg/l | - | | 3 | 3 | 3 |
| 25. | Boron (as B) | mg/l | - | | 2 | 2 | 2 |
| 26. | Percent Sodium | % | - | | - | - | - |
| 27. | Residual Sodium Carbonate | mg/l | - | | - | - | - |
| 28. | Cyanide (as CN) | mg/l | - | | 0.2 | 0.2 | 0.2 |
| 29. | Fluoride (as F) | mg/l | - | | 2 | 2 | 2 |
| 30. | Dissolved Phosphates(as P) | mg/l | - | | 5 | 5 | 5 |
| 31. | Sulphide (as S) | mg/l | - | | 2 | 2 | 2 |
| 32. | Pesticides | mg/l | - | | | | |
| 33. | Phenolic Compounds (as C6H5OH) | mg/l | - | | 1 | 1 | 1 |
| 34. | Radioactive materials a) Alpha emitters | micro curie/ml | - | | 10-7 | 10-7 | 10-7 |

| | | | | | | | |
|-----|--|-------------------|---|--|------|------|------|
| 35. | Radioactive materials b). Beta emitters | micro curie/ml | - | | 10-6 | 10-6 | 10-6 |
| 36. | Fecal Coliform | MPN/100ml | - | | - | - | - |

4. All units of the sewage and Trade effluent treatment plants shall be operated efficiently and continuously so as to achieve the standards prescribed in Sl No.3 above or to achieve the zero liquid discharge of effluent as applicable.
5. The occupier shall maintain the Electro Magnetic Flow Meters/water Meters installed at the inlet of the water supply connection for each of the purposes mentioned below for assessing the quantity of water used and ensuring that such meters are easily accessible for inspection and maintenance and for other purposes of the Act.
 - a. Industrial Cooling, Spraying in mine pits or boiler feed.
 - b. Domestic purpose.
 - c. Process.
6. The occupier shall maintain the Electro Magnetic Flow Meters with computer recording arrangement for measuring the quantity of effluent generated and treated for the monitoring purposes of the Act.
7. Log book for each of the unit operations of ETP have to be maintained to reflect the working condition of ETP along with the readings of the Electro Magnetic Flow Meters installed to assess effluent quantity and the same shall be furnished for verification of the Board officials during inspection.
8. The occupier shall at his own cost get the samples of effluent/surface water/ground water collected in and around the unit by Board officials and analyzed by the TNPC Board Laboratory periodically.
9. Any upset condition in any of the plants of the factory which is, likely to result in increased effluent discharge and result in violation of the standards mentioned in Sl. No.3 above shall be reported to the Member Secretary / Joint Chief Environmental Engineer-Monitoring and the concerned District/Assistant Environmental Engineer of the Board by e-mail immediately and subsequently by Post with full details of such upset condition.
10. The occupier shall always comply and carryout the order/directions issued by the Board in this Consent Order and from time to time without any negligence. The occupier shall be liable for action as per provisions of the Act in case of non compliance of any order/directions issued.
11. The occupier shall develop adequate width of green belt at the rate of 400 numbers of trees per Hectare.
12. The occupier shall provide and maintain rain water harvesting facilities.
13. The occupier shall ensure that there shall not be any discharge of effluent either treated or untreated into storm water drain at any point of time.
14. In the case of zero liquid discharge of effluent units, the occupier shall adhere the following conditions as laid under.
 - i). The occupier shall ensure zero liquid discharge of effluent, thereby no discharge of untreated / treated effluent on land or into any water bodies either inside or outside the premises at any point of time.
 - ii) The occupier shall operate and maintain the Zero liquid discharge treatment components comprising of Primary, Secondary and tertiary treatment systems at all times and ensure that the RO permeate/Evaporator condensate shall be recycled in the process and the final RO reject shall be disposed off with the reject management system ensuring zero liquid discharge of effluents in the premises.
 - iii) The occupier shall operate and maintain the reject management system effectively and recover the salt from the system which shall be reused in the process if reusable or shall be disposed off as ETP sludge.
 - iv) In case of failure to achieve zero discharge of effluents for any reason, the occupier shall stop its production and operations forthwith and shall be reported to the Member Secretary/Joint Chief Environmental Engineer-Monitoring and the concerned District/Assistant Environmental Engineer of the Board by e-mail immediately and subsequently by Post with full details of such upset condition.
 - v) The occupier shall restart the production only after ascertaining that the Zero discharge treatment system can perform effectively for achieving zero discharge of effluents.

Additional Conditions:

1. The unit shall manufacture only the products specified in the EC and shall not manufacture pesticide formulation products.
2. The unit shall operate and maintain the Sewage Treatment Plant efficiently and continuously and the treated sewage shall be utilised for green belt development/gardening after satisfying the standards prescribed by the Board.
3. The unit shall not dispose the treated sewage to CUSECS and shall utilize the same for gardening as specified in the EC.
4. The unit shall operate and maintain the ETP followed by RO plant, MEE continuously and efficiently so as to achieve the ZLD.
5. The unit shall ensure that no discharge of untreated/treated trade effluent on land or into any water bodies either inside or outside the premises at any point of time.
6. The unit shall analyze the treated sewage and treated trade effluent samples through TNPCB lab periodically and furnish ROA of the same.
7. The unit shall operate and maintain the EMFM provided at the inlet and out let of STP.
8. The unit shall maintain the electromagnetic flow meters at the inlet of ETP, inlet of the RO System, RO permeate line, RO reject line, Inlet of Multiple Effect Evaporator, Multiple Effect Evaporator condensate line in good condition and transmit the quality data to WQW, TNPCB, Chennai at all the time.
9. The unit shall maintain CCTV camera for monitoring the ZLD system in good condition and transmit the quality data to WQW, TNPCB, Chennai at all the time.
10. The unit shall dispose the non-hazardous waste then and there without any accumulation.
11. The unit shall ensure that the Hazardous wastes generated shall be properly disposed as per the Authorization obtained under Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.
12. The unit shall apply for Authorization for proper disposal of hazardous waste under Hazardous and Other Waste (Management and Transboundary Movement) Rules, 2016 under category 28(Schedule-D) for disposal of 28.4 - off specification products and 28.5 - Date – expired products if any.
13. The unit shall ensure proper disposal of discarded/date expired medicines and not to dispose discarded/date expired medicines in the lake or any other water bodies or any lands.
14. The unit shall maintain Form – 3 for the generation of hazardous wastes and shall file annual return in Form - 4 to the Board. The unit shall maintain the hazardous waste display board in front of the unit clearly updating the same regularly as per CPCB guidelines.
15. The unit shall not use ‘use and throwaway plastics’ such as plastic sheets used for food wrapping, spreading on dining table etc., plastic plates, plastic coated tea cups, plastic tumbler, water pouches and packets, plastic straw, plastic carry bag and plastic flags irrespective of thickness, within the industry premises. Instead it shall encourage use of eco friendly alternative such as banana leaf, areca nut palm plate, stainless steel, glass, porcelain plates/cups, cloth bag, Jute bag etc.,
16. The unit shall continue to develop adequate green belt with thick canopy within the premises, so as to attenuate air and noise pollution furnish the exact green belt area ear marked/developed as per norms in the unit premises and furnish photographs along with latitude and longitude co-ordinates.
17. The unit shall be liable to pay the consent fee and shall remit the difference in amount in case of any revision of consent fee by the Government.
18. The unit shall submit Environmental Statement for every financial year ending the 31st March in Form -V as per the Rule 14 of the Environment (Protection) Rules, 1986.
19. The % of the CER may be at least 1.5 times the slabs given in the OM dated 01.05.2018 for SPA and 2 times for CPA in case of Environmental clearance
20. The unit shall comply with the conditions stipulated in the restarting order issued by Director of Industrial Safety and Health on safety in Ir.No.C2/10381/2021/Dt.28.06.2021.
21. The unit shall withdraw the Environmental Clearance application filed in Parivesh Portal , if any, for the products for which “No increase in Pollution Load certificate” has already been obtained by the unit.
22. The unit shall comply with all the conditions stipulated in the “No increase in Pollution Load certificate” dated 12.03.2021 obtained by the unit.
23. The unit shall ensure to have valid Policy under Public Liability Insurance Act, 1991 at all times.

**For Member Secretary,
Tamil Nadu Pollution Control Board,
Chennai**

GENERAL CONDITIONS

1. The occupier shall make an application along with the prescribed consent fee for grant of renewal of consent at least 60 days before the date of expiry of this Consent Order along with all the required particulars ensuring that there is no change in Production quantity and change in sewage/Trade effluent.
2. This Consent is issued by the Board in consideration of the particulars given in the application. Any change or alteration or deviation made in actual practice from the particulars furnished in the application will also be ground for review/variation/revocation of the Consent Order under Section 27 of the Act and to make such variation as deemed fit for the purpose of the Act.
3. The consent conditions imposed in this order shall continue in force until revoked under Section 27(2) of the Act.
4. After the issue of this order, all the 'Consent to Operate' orders issued previously under Water (Prevention and Control of Pollution) Act, 1974 as amended stands defunct.
5. The occupier shall maintain an Inspection Register in the factory so that the inspecting officer shall record the details of the observations and instructions issued to the unit at the time of inspection for adherence.
6. The occupier shall provide and maintain an alternate power supply along with separate energy meter for the Effluent Treatment Plant sufficient to ensure continuous operation of all pollution control equipments to maintain compliance.
7. The occupier shall provide all facilities to the Board officials for inspection and collection of samples in and around the factory at any time.
8. The occupier shall display the flow diagram of the sources of effluent generation and pollution control systems provided at the ETP site.
9. The solid waste such as sweepings, wastage, package, empty containers, residues, sludge including that from air pollution control equipments collected within the premises of the industrial plant shall be collected in an earmarked area and shall be disposed off properly.
10. The occupier shall collect, treat the solid wastes like food waste, green waste generated from the canteen and convert into organic compost.
11. The occupier shall segregate the Hazardous waste from other solid wastes and comply in accordance with Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2008.
12. The occupier shall maintain good house-keeping within the factory premises.
13. All pipes, valves, sewers and drains shall be leak proof. Floor washings shall be admitted into the trade effluent collection system only and shall not be allowed to find their way in storm drains or open areas.
14. The occupier shall ensure that there shall not be any diversion or by-pass of trade effluent on land or into any water sources.
15. The occupier shall ensure that solar Evaporation pans shall be constructed in such a way that the bottom of the solar pan is at least 1 m above the Ground level (if applicable).
16. The occupier shall furnish the following returns in the prescribed formats to the concerned District office regularly.
 - a) Monthly water consumption returns of each of the purposes with water meter readings in Form-I on or before 5th of every month.
 - b) Yearly return on Hazardous wastes generated and accumulated for the period from 1st April to 31st March in Form-4 before the end of the subsequent 30th June of every year (if applicable).
 - c) Yearly Environmental Statement for the period from 1st April to 31st March in Form -V before the end of the subsequent 30th September of every year(if applicable).
17. If applicable, the occupier has to comply with the provisions of Public Liability Insurance Act, 1991 to provide immediate relief in the event of any hazard to human beings, other living creatures/plants and properties while handling and storage of hazardous substances.
18. The issuance of this consent does not authorize or approve the construction of any physical structures or facilities or the undertaking of any work in any natural watercourse or in Government Poromboke lands.
19. The issuance of this Consent does not convey any property right in either real personal property or any exclusive privileges, nor does it authorize any injury to private property or Government property or any invasion of personal rights nor any infringement of Central, State laws or regulation.

20. The occupier shall forth with keep the Board informed of any accident of unforeseen act or event of any poisonous, noxious or polluting matter or emissions are being discharged into stream or well or air as a result of such discharge, water or air is being polluted.
21. If due to any technological improvements or otherwise the Board is of opinion that all or any of the conditions referred to above requires variation (including the change of any treatment system, either in whole or in part) the Board shall, after giving the applicant an opportunity of being heard, vary all or any of such conditions and thereupon the applicant shall be bound to comply with the conditions as so varied.
22. In case there is any change in the constitution of the management, the occupier of the new management shall file fresh application under Water (Prevention and Control of Pollution) Act, 1974, as amended in Form-II alongwith relevant documents of change of management immediately and get the necessary amendment with renewal of consent order.
23. In case there is any change in the name of the company alone, the occupier shall inform the same with relevant documents immediately and get the necessary amendments for the change of name from the Board.
24. The occupier shall display this consent order granted to him in a prominent place for perusal of the inspecting Officers of this Board.

**For Member Secretary,
Tamil Nadu Pollution Control Board,
Chennai**

Crimsun Organics Pvt Ltd, Cuddalore.

Preventive Maintenance Monthly Checklist for Pressure Gauge MTD/F/031

| | | | | | | | | |
|--|---------------------------|-------------------|-----------------------------------|--------------------|--------|-----------------|-------|------------|
| | | Tag. No. | R-108 | | | | | |
| Manufacturer | G.T | | Model No. | QSS 316L | | | | |
| Serial No. | J59DMU-B19-1171 | | Dial Size. | 6" | | | | |
| Range | 0 to 7 kg/cm ² | | Date | 17.4.21 | | | | |
| <input type="checkbox"/> Instrument Undamaged. | | | | | | | | |
| Calibration Check: | Input | | Reading Or Output | | | | | |
| | %SPAN | ACTUAL L (Bar) | RISING | | | FALLING | | |
| | | | ACTUAL (Bar) | %SPAN | ERROR% | ACTUAL (Bar) | %SPAN | ERROR % |
| | 0 | 0 | 0.0 | 0.00 | 0.0 | 7.0 | 7.01 | 0.01 |
| | 25 | 2 | 2.0 | 2.01 | 0.01 | 6.0 | 6.01 | 0.01 |
| | 50 | 4 | 4.0 | 4.0 | 0.0 | 4.0 | 4.0 | 0.0 |
| | 75 | 6 | 6.0 | 6.0 | 0.0 | 2.0 | 2.0 | 0.0 |
| 100 | 7 | 7.0 | 7.01 | 0.01 | 0.0 | 0.0 | 0.0 | |
| Corrections: | | | | | | | | |
| <input type="checkbox"/> Zero Calibration <input type="checkbox"/> Dial Glass Damage <input checked="" type="checkbox"/> Span Calibration <input checked="" type="checkbox"/> Upscale <input checked="" type="checkbox"/> Downscale | | | | | | | | |
| Remarks / Observations: | | | | | | | | |
| Calibration Valid for One Hydrostatic Test Only. +/- 0.6% ACCURACY FOR PRESSURE GAUGES. <input checked="" type="checkbox"/> ACCEPTED <input type="checkbox"/> REJECTED | | | | | | | | |
| Checked By: Instrument Technician | | | Verified By: Production In charge | | | | | |
| Name | Srinivasan | | Name | Malleswararao | | | | |
| Signature | Srinivasan | | Signature | <i>[Signature]</i> | | | | |
| Date | 17.4.21 | | Date | 17.04.2021 | | | | |

| | | |
|--|--|--|
| Prepared by: <i>[Signature]</i> 16.04.2021 | Reviewed by: <i>[Signature]</i> 16/04/2021 | Approved by: <i>[Signature]</i> 16/04/2021 |
|--|--|--|

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Crimsun Organics Pvt Ltd, Cuddalore.

Preventive Maintenance Monthly Checklist for Pressure Gauge MTD/F/031

| | | | | | | | | |
|---|-------------------------|--------------|-------------------|-----------------------------------|--------|--------------|-------|---------|
| | | Tag. No. | R-108 J/c | | | | | |
| Manufacturer | BAUMER | | Model No. | SS-316L | | | | |
| Serial No. | L164.59-0/002 | | Dial Size. | 4" | | | | |
| Range | 0-16 kg/cm ² | | Date | 17-4-21 | | | | |
| <input type="checkbox"/> Instrument Undamaged | | | | | | | | |
| Calibration Check: | Input | | Reading Or Output | | | | | |
| | %SPAN | ACTUAL (Bar) | RISING | | | FALLING | | |
| | | | ACTUAL (Bar) | %SPAN | ERROR% | ACTUAL (Bar) | %SPAN | ERROR % |
| | 0 | 0 | 0.0 | 0.00 | 0.0 | 16.0 | 16.00 | 0.0 |
| | 25 | 4 | 4.0 | 4.01 | 0.01 | 12.0 | 12.00 | 0.0 |
| | 50 | 8 | 8.0 | 8.00 | 0.0 | 8.0 | 8.00 | 0.0 |
| | 75 | 12 | 12.0 | 11.98 | -0.02 | 4.0 | 4.01 | 0.01 |
| 100 | 16 | 16.0 | 16.00 | 0.0 | 0 | 0.0 | 0.0 | |
| Corrections: <input type="checkbox"/> Zero Calibration <input type="checkbox"/> Dial Glass Damage <input checked="" type="checkbox"/> Span Calibration <input type="checkbox"/> Upscale <input checked="" type="checkbox"/> Downscale | | | | | | | | |
| Remarks / Observations: Calibration Valid for One Hydrostatic Test Only. +/- 0.6% ACCURACY FOR PRESSUE GUAGES. <input checked="" type="checkbox"/> ACCEPTED <input type="checkbox"/> REJECTED | | | | | | | | |
| Checked By: Instrument Technician | | | | Verified By: Production In charge | | | | |
| Name | Shrinivasan. | | Name | Maha... | | | | |
| Signature | Shrinivasan. | | Signature | [Signature] | | | | |
| Date | 17.4.21 | | Date | 17-04-2021 | | | | |

| | |
|------------------------------|---------------------------|
| Prepared by: | Reviewed by: |
| K. [Signature] 16.04.2021 | [Signature] 16/04/2021 |



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| Description | | Model No. | | |
|-----------------------------------|------------------|-----------------------|----------------------------------|-----------------|
| RTD | | DP120H-F-0-1-X | | |
| Range | | Serial No. | | |
| -50°C to 200°C | | - | | |
| Least Count | | Tag No | | |
| 0.01°C | | R-108 | | |
| Make | | Accuracy | | |
| POLMON | | ± 0.5°C | | |
| Equipment Name | | Location | | |
| R-108 | | 2 nd Floor | | |
| Date | | 17-4-21 | | |
| S.No. | Standard Reading | Duc Reading | Error | Uncertainty (±) |
| | °C | °C | °C | °C |
| 1 | -50 | -50.03 | -0.03 | |
| 2 | 0 | 0 | 0 | |
| 3 | 100 | 100.04 | 0.04 | |
| 4 | 150 | 150.04 | 0.04 | |
| 5 | 200 | 200.06 | 0.06 | |
| 6 | | | | |
| Remarks: | | | | |
| Checked By: Instrument Technician | | | Verified By: Production Incharge | |
| Name | Shrinivasan | Name | Maheswararao | |
| Signature | Shrinivasan | Signature | [Signature] | |
| Date | 17.4.21 | Date | 17.04.2021 | |
| Prepared By: | Revised By: | Approved By: | | |
| [Signature] | [Signature] | [Signature] | | |
| Date: 16.04.2021 | Date: 16/04/2021 | Date: 16/04/2021 | | |
| Maintenances | Maintenances | Quality Assurance | | |



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[Signature] 17/04/2021

Crimsun Organics Pvt Ltd, Cuddalore.

Preventive Maintenance Monthly Checklist for Pressure Gauge

| | | | | | | | | |
|---|--------------------------|--------------|-------------------|-----------------------------------|--------|--------------|-------|---------|
| | | Tag. No. | R-108 | | | | | |
| Manufacturer | G.I | | Model No. | C 33 2164 | | | | |
| Serial No. | J39DMU-E19-1171 | | Dial Size. | 6" | | | | |
| Range | 0 to 7kg/cm ² | | Date | 17.3.21 | | | | |
| <input type="checkbox"/> Instrument Undamaged. | | | | | | | | |
| Calibration Check: | Input | | Reading Or Output | | | | | |
| | %SPAN | ACTUAL (Bar) | RISING | | | FALLING | | |
| | | | ACTUAL (Bar) | %SPAN | ERROR% | ACTUAL (Bar) | %SPAN | ERROR % |
| | 0 | 0 | 0.0 | 0.00 | 0.00 | 7.0 | 7.01 | 0.01 |
| | 25 | 2 | 2.0 | 2.01 | 0.01 | 6.0 | 6.01 | 0.01 |
| | 50 | 4 | 4.0 | 4.0 | 0.0 | 4.0 | 4.0 | 0.0 |
| | 75 | 6 | 6.0 | 6.0 | 0.0 | 2.0 | 2.0 | 0.0 |
| 100 | 7 | 7.0 | 7.01 | 0.01 | 0.0 | 0.0 | 0.0 | |
| Corrections: <input type="checkbox"/> Zero Calibration <input type="checkbox"/> Dial Glass Damage <input type="checkbox"/> Span Calibration <input type="checkbox"/> Upscale <input type="checkbox"/> Downscale | | | | | | | | |
| Remarks / Observations: Calibration Valid for One Hydrostatic Test Only. +/- 0.6% ACCURACY FOR PRESSUE GUAGES. <input checked="" type="checkbox"/> ACCEPTED <input type="checkbox"/> REJECTED | | | | | | | | |
| Checked By: Instrument Technician | | | | Verified By: Production In charge | | | | |
| Name | Srinivasan | | Name | Mahaeswararao | | | | |
| Signature | Srinivasan | | Signature | [Signature] | | | | |
| Date | 17.3.21 | | Date | 17.03.2021 | | | | |

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Crimsun Organics Pvt Ltd, Cuddalore.

Preventive Maintenance Monthly Checklist for Pressure Gauge

| | | | | | | | | |
|--|-------------------------|--------------|-------------------|-----------------------------------|--------|--------------|-------|---------|
| | | Tag. No. | R-1085/C | | | | | |
| Manufacturer | BAUMER | | Model No. | SS-316L | | | | |
| Serial No. | L164-59-01002 | | Dial Size. | 4" | | | | |
| Range | 0-16 Kg/cm ² | | Date | 17-3-21 | | | | |
| <input type="checkbox"/> Instrument Undamaged | | | | | | | | |
| Calibration Check: | Input | | Reading Or Output | | | | | |
| | %SPAN | ACTUAL (Bar) | RISING | | | FALLING | | |
| | | | ACTUAL (Bar) | %SPAN | ERROR% | ACTUAL (Bar) | %SPAN | ERROR % |
| | 0 | 0 | 0.0 | 0.00 | 0.00 | 16.0 | 16.00 | 0.00 |
| | 25 | 4 | 4.0 | 4.01 | 0.01 | 12.0 | 12.00 | 0.00 |
| | 50 | 8 | 8.0 | 8.00 | 0.00 | 8.0 | 8.00 | 0.00 |
| | 75 | 12 | 12.0 | 11.98 | 0.02 | 4.0 | 4.00 | 0.00 |
| 100 | 16 | 16.0 | 16.00 | 0.00 | 0 | 0 | 0 | |
| Corrections: <input type="checkbox"/> Zero Calibration <input type="checkbox"/> Dial Glass Damage <input checked="" type="checkbox"/> Span Calibration <input checked="" type="checkbox"/> Upscale <input checked="" type="checkbox"/> Downscale | | | | | | | | |
| Remarks / Observations: Calibration Valid for One Hydrostatic Test Only. +/- 0.6% ACCURACY FOR PRESSUE GUAGES. <input checked="" type="checkbox"/> ACCEPTED <input type="checkbox"/> REJECTED | | | | | | | | |
| Checked By: Instrument Technician | | | | Verified By: Production In charge | | | | |
| Name | Srinivasan | | Name | M. Chelvaraj | | | | |
| Signature | Srinivasan | | Signature | [Signature] | | | | |
| Date | 17-3-21 | | Date | 17.03.2021 | | | | |

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| Crimsun Organics Pvt Ltd , Cuddalore. | | | | |
|--|------------------|-------------|----------------------------------|-------------------------|
| Preventive Maintenance Monthly Checklist For RTD Sensor / Temperature Indicator | | | | |
| Description | RTD | | Model No. | DP120H-F-0-1-X |
| Range | -50°C to 200°C | | Serial No. | - |
| Least Count | 0.01°C | | Tag No | R-108 |
| Make | POLMON | | Accuracy | ±0.5°C |
| Equipment Name | R-108 | | Location | 2nd Floor |
| Date | 17.3.21 | | | |
| S.No. | Standard Reading | Duc Reading | Error | Uncertainty (±) |
| | °C | °C | °C | °C |
| 1 | -50 | -50.03 | -0.03 | |
| 2 | 0 | 0.0 | 0 | |
| 3 | 100 | 100.04 | 0.04 | |
| 4 | 150 | 150.04 | 0.04 | |
| 5 | 200 | 200.06 | 0.06 | |
| 6 | | | | |
| Remarks: | | | | |
| Checked By: Instrument Technician | | | Verified By: Production Incharge | |
| Name | Srinivasan. | | Name | M. G. N. N. R. C. K. C. |
| Signature | Srinivasan. | | Signature | <i>[Signature]</i> |
| Date | 17.3.21 | | Date | 17.03.2021 |

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Crimson Organics Pvt Ltd, Cuddalore
LLF Check List for Reactors - Monthly

SOP Ref.: SOP/ENG/005-0
Format No.: ENG/F/001-0
Effective Date: 09/11/2020

| Plant: C10 | | Equipment Tag No: R-108 | | | |
|------------------|--|-------------------------------------|-------------------------------------|-------------------------------------|--------------|
| Date: 15-03-2021 | | | | | |
| S. No | Check Points | Yes | No | Not applicable | Action Taken |
| | LOOK | | | | |
| 1 | Is there any leakages from manhole/protection ring due to gasket / glass Lining / raised surface | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 2 | Is there any leakages from mechanical seal / gland rope | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 3 | Is there any damage in manhole glass lining | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 4 | Manhole tightening clamps / bolts condition are good | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 5 | Is manhole hinge found good | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 6 | Whether agitator to gear box & gear box to agitator guard fixed properly | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 7 | Whether the gear box oil level is correct | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 8 | Is there any oil leakage / spillage from gear box | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 9 | Measure the gear box temperature using non-contact infrared thermometer (°C) | 52 °C | | | |
| 10 | Whether the thermo-siphon pot pressure gauge reading shows minimum of 1.5 Kg / cm ² more than the reactor pressure. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 11 | Is there leakage from Flush bottom valve gland area | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 12 | Is flush bottom valve spindle threads found good & properly lubricated | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 13 | Is there any damage in flush bottom valve hand wheel seating area | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 14 | Utility process valves passing & physical condition | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

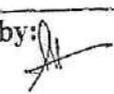
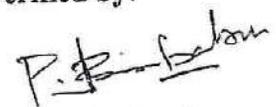
| | | |
|--|--|---|
| Prepared by: <i>[Signature]</i> 3/11/2020 | Reviewed by: <i>[Signature]</i> 3/11/2021 | Approved by: <i>[Signature]</i> 06/11/2020 |
|--|--|---|

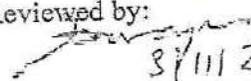
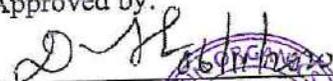
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Page 1 of 2
C-9, C-10 & C-11
SIPCOT
Indl. Complex
Kudikadu
Village.
CUDDALORE

| | | | | | |
|-----------------|--|-------------------------------------|-------------------------------------|-------------------------------------|--|
| 15 | Drive belt condition (if applicable) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 16 | Whether the motor & gear box base bolts conditions are good | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 17 | Motor jack bolts are free from rust & properly lubricated | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 18 | Check the Flush bottom valve's pusher plate & bush condition | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| LISTEN | | | | | |
| 19 | Is there any abnormal sound from Motor to Gear Box pulley /coupling/bush (If Applicable) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 20 | Is there any abnormal sound from motor to gear box belt drive (If Applicable) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 21 | Is there any abnormal sound from gear box to agitator coupling/bush | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| FEEL | | | | | |
| 22 | Is there any abnormal vibration observed in gear box | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 23 | Is there any abnormal vibration observed in agitator bearing Area | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| Remarks: | | | | | |

| | | |
|---|---|--|
| Done by:  Mechanical Technician | Checked by:  Mechanical Engineer | Verified by:  Production In-charge |
|---|---|--|

| | | |
|--|---|--|
| Prepared by:  31/11/2020 | Reviewed by:  31/11/2020 | Approved by:  |
|--|---|--|

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Crimsun Organics Pvt Ltd, Cuddalore
 PREVENTIVE MAINTENANCE HALF YEARLY CHECKLIST FOR STAINLESS STEEL REACTOR
 (INTERNAL INSPECTION)

| Plant: C10 | | Equipment Tag No: R-108 | Date: 01-04-2021 |
|------------|--|------------------------------|--------------------|
| S. No | Description | Observation | Action Taken |
| 1 | Shell and Dish condition - Pitting / Corrosion / Erosion | Normal | |
| 2 | Welding condition - Dish / Shell | Normal | |
| 3 | Manhole Condition - Bond / Corrosion | Normal | |
| 4 | Manhole gasket Sealing / Surface Condition. | Normal | |
| 5 | Mechanical seal leak for single seal reactors (Apply soap oil in the seal area with reactor under N2 pressure 0.5Kg/cm ² -1 Kg/cm ² or as per process pressure) if applicable. | NA | |
| 6 | Mechanical Inboard Seal leak for double seal reactors (with Thermosyphon pot pressure 1.5Kg/cm ² more than the reactor pressure and inspecting the agitator shaft) if applicable. | NO leak | |
| 7 | Mechanical Outboard Seal leak for double seal reactors (with Thermosyphon pot pressure 1.5Kg/cm ² more than the reactor pressure and inspecting through the seal leak port) if applicable | NO leak | |
| 8 | Agitator Shaft Condition - Pitting / Corrosion / Erosion | Normal | |
| 9 | Upper shaft condition - Pitting / Corrosion / Erosion | Normal | |
| 10 | Lower shaft condition - Pitting / Corrosion / Erosion | Normal | |
| 11 | Upper shaft coupling condition | Normal | |
| 12 | Lower shaft coupling condition | Normal | |
| 13 | Upper shaft coupling lock bolt condition | Normal | |
| 14 | Lower shaft coupling lock bolt condition | Normal | |
| 15 | Upper shaft coupling key / shake | Normal | |
| 16 | Bottom SS guide bush condition / welding condition | Normal | |
| 17 | Bottom Clit condition / welding condition | Normal | |
| 18 | Bottom PTFE bush condition | Normal | |
| 19 | Bottom PTFE bush lock bolt condition | Bolt to be tighten | Tightened |
| 20 | Bottom valve PTFE Bush condition. | Normal | |
| 21 | Bottom valve PTFE Bush lockout condition | Normal | |
| 22 | Anchor / Propeller bush condition / Welding condition | Normal | |
| 23 | Anchor / Propeller bush key shake | Normal | |
| 24 | Anchor / Propeller lock bolt condition | Lock bolt in loose condition | Bolts are tighten. |
| 25 | Thermowell condition-Pinhole/ Pitting/Corrosion | Normal | |
| 26 | Thermowell clamping hook condition / Welding condition | Normal | |
| 27 | Thermowell thread joint condition | Normal | |
| 28 | Baffle Plate condition | Normal | |
| 29 | Baffle Plate to Clit welding condition | Normal | |
| 30 | Baffle Plate to clit bolt condition | Normal | |
| 31 | Nozzle / Manhole welding condition | Normal | |
| 32 | Spray Nozzle condition | NA | |
| 33 | Agitator bearing lock nut and washer condition | Normal | |
| 34 | Check the oil quality in the gear box | Low level | Oil is top-up |
| 35 | Alignment of motor to gear box & gear box to agitator | Normal | |
| 36 | Agitator RPM Speed 1 | | |
| | Agitator RPM Speed 2 | | |
| | Agitator RPM Speed 3 | | |

Remarks: Vessel entry done by fitter

Done by: *[Signature]* 01/04/2021 Mechanical Technician
 Checked by: *[Signature]* 01/04/2021 Mechanical Engineer
 Checked by: *[Signature]* 01/04/2021 Production Incharge

Prepared by: *[Signature]* R. Jagadeesan Date: 3/4/2020
 Reviewed by: *[Signature]* C.M. Nathees Date: 3/11/2020
 Approved by: *[Signature]* Date: 06/04/2021
 Quality Assurance
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Crimsun Organics Pvt Ltd , Cuddalore

MTD/F/029

PREVENTIVE MAINTENANCE MONTHLY EXAMINATION CHECKLIST FOR SAFETY VALVE

| Plant: C10 | Equipment Tag No : R-108 | Date: 16.04.2021 | | | |
|---|--|---|-------------------------------------|---|--------------|
| S. No | Check Points | Yes | No | Not applicable | Action Taken |
| 1 | Check the physical condition of bolt & nuts for any corrosion or damage | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 2 | Check the flange condition for any damage/ symptoms of any leak | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 3 | Check the safety valve body for any corrosion or damage | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 4 | Check the safety valve body painting condition | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 5 | Check the safety valve connected pipe line condition for corrosion | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 6 | Check the safety valve connected pipe line painting condition for any damage | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 7 | Check the safety valve outlet pipe line joint bolt nut condition /any leak | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 8 | Check the safety valve vent nozzle for any symptoms of valve passing | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| Remarks: Reactor Jacket Safety Valve working normal | | | | | |
| Done By: <i>A. Aru</i> Mechanical Technician | | Checked By: <i>Jyothir</i> Mechanical Engineer | | Verified By: <i>S. Mogan</i> Production Incharge | |
| Prepared By: <i>Jyothir</i> Date: 27.11.2020 Maintenance | | Reviewed By: <i>Jyothir</i> Date: 27/11/2020 Maintenance | | Approved By: <i>D. H.</i> Date: 29/11/2020 Quality Assurance | |

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Crimsun Organics Pvt Ltd , Cuddalore

MTD/F/030

PREVENTIVE MAINTENANCE MONTHLY EXAMINATION CHECKLIST FOR PRESSURE REDUCING VALVE

Plant: C 10

Equipment Tag No: R-108
572m line

Date: 16.01.2021

| S. No | Check Points | Yes | No | Not applicable | Action Taken |
|-------|---|-------------------------------------|-------------------------------------|--------------------------|--------------|
| 1 | Check the down stream pressure is lesser than 2.7 bar pressure | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 2 | Check the physical condition of bolt & nuts for any corrosion or damage | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 3 | Check the flange condition for any damage | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 4 | Check the Pressure Regulating valve body for any corrosion or damage | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 5 | Check the Pressure Regulating valve body painting condition | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 6 | Check the Pressure Regulating valve connected pipe line condition for corrosion | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 7 | Check the any air leakage in diaphragm air connection. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 8 | Check the flange gasket condition for any leak | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |

Remarks:

PRV working normal.

Done By:

D. Arul
Mechanical Technician

Checked By:

Jyothi
Mechanical Engineer

Verified By:

S. Moorthy
Production Incharge

Prepared By:

Jyothi
Date: 27.11.2020
Maintenance

Reviewed By:

S. Arun
Date: 27/11/2020
Maintenance

Approved By:

S. Arun
Date: 27/11/2020
Quality Assurance

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MTD/F/009

THICKNESS MEASUREMENT OF STAINLESS STEEL REACTOR BODY

Equip. No.: R-108

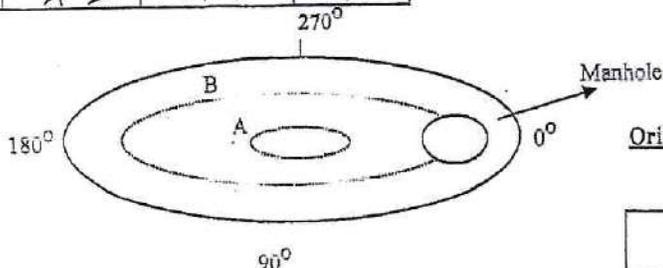
Capacity: 14 KL

Date: 12.03.2021

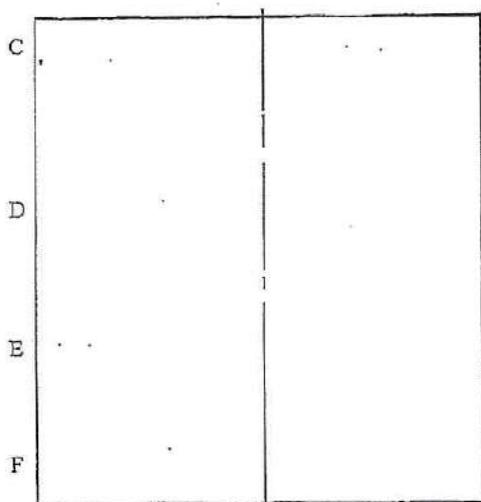
MOC: SS

Thickness meter calibration details

| SI No | Template thick | Before calibration | After calibration |
|-------|----------------|--------------------|-------------------|
| 1 | A-2 | 4.1 | 4.2 |



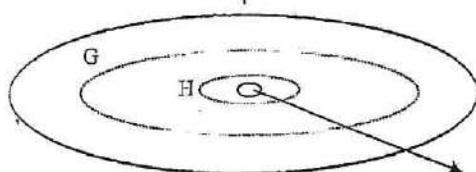
Orientation: Clock wise from Man hole



| Location | Thickness in mm | | | |
|----------|-----------------|-------|-------|-------|
| | 0° | 90° | 180° | 270° |
| Top A | 14.01 | 13.99 | 14.00 | 13.97 |
| Top B | 14.00 | 13.98 | 14.01 | 13.97 |
| Wall C | 13.98 | 14.00 | 14.01 | 13.98 |
| Wall D | 13.97 | 14.01 | 14.02 | 14.01 |
| Wall E | 13.99 | 13.99 | 14.00 | 14.00 |
| Wall F | 14.00 | 13.98 | 13.99 | 14.00 |
| Bottom G | 13.99 | 14.00 | 13.99 | 14.00 |
| Bottom H | 13.07 | 14.01 | 13.98 | 13.99 |

Distance: CD = DE = EF

| | Original | Minimum Permissible |
|--------|----------|---------------------|
| Top | 14.00 | 12.60 |
| Wall | 14.00 | 12.60 |
| Bottom | 14.00 | 12.60 |



Remarks:

Remarks:

| | | |
|---|--|--|
| Done By: <i>D. Arul</i> Mechanical Technician | Checked By: <i>Jayaram</i> Mechanical Engineer | Verified By: <i>S. Manoj</i> Production Incharge |
|---|--|--|

| | | |
|---|---|--|
| Prepared By: <i>Jayaram</i> Date: 03/11/2020 Maintenance | Reviewed By: <i>Jayaram</i> Date: 03/11/2020 Maintenance | Approved By: <i>S. Manoj</i> Date: 06/11/2020 Quality Assurance |
|---|---|--|

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S. Manoj
09/11/2020

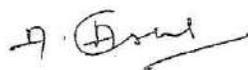


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 Pressure Test

MTD/F/028

| Plant: C10 Equipment No.: R-108 Date: 12.03.2021 | | | |
|--|--------------------------------|-------------------------|----------------------------|
| S. No., | Description | Observation | Action Taken |
| 01 | Pressure test Set pressure | 1.5 kg/cm ² | Pneumatic test by nitrogen |
| 02 | Time duration of pressure test | 20 min | |
| 03 | Starting time of pressure test | 10:10 | |
| 04 | Ending time of pressure test | 10:30 | |
| 05 | Pressure drops | 0.02 kg/cm ² | |
| Remarks: No leak was observed. | | | |

Done by:



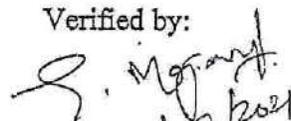
Sign & date: 12.03.2021

Checked by:

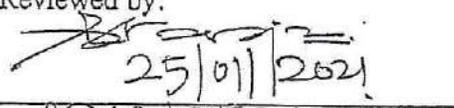
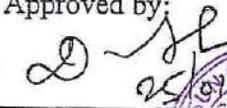

12.03.2021

Sign & date:

Verified by:


12/03/2021

Sign & date:

| | | |
|--|--|---|
| Prepared by:  R. Jegadeesan 25.01.2021 | Reviewed by:  M. Natarajan 25/01/2021 | Approved by:  S. M. Srinivas 25/01/2021 |
|--|--|---|

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