

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
SOUTH ZONE, CHENNAI**

**O.A NO. 16 of 2019**

K. Gemini (Deceased)  
Represented by his Legal Representative

... Applicant

Vs

1. Union of India represented by  
And 3 others

.... Respondents

**MEMO FILED BY THE 4<sup>TH</sup> RESPONDENT**

M/s. Shree Law Services

T.Ravichandran

D.SairamKumar

K.Deva Dakshan

**Counsel for 4<sup>th</sup> Respondent**

**9789986612**

ORIGINAL APPLICATION NO. 16 of 2019

K. Gemini (Deceased)  
5/1-34 Rettaipuliyamaram  
Raman Nagar Post  
Mettur Dam, Salem District 636 403

... Applicant

Vs

1. Union of India represented by  
The Secretary to Government  
Ministry of Environment, Forests & Climate Change  
III Floor, Pritvi Wing  
India Paryavaran Bhavan  
Jor Bagh, New Delhi 110003  
Email: [secy-moef@nic.in](mailto:secy-moef@nic.in)  
Phone No. 011 24695262 & 24695265
2. The State of Tamil Nadu represented  
By the Secretary to Government  
Environment and Forests Department  
Fort St. George, Chennai 600 009  
Email: [forsec@tn.gov.in](mailto:forsec@tn.gov.in)  
Phone No 044 25671511
3. The District Environment Engineer  
Tamil Nadu Pollution Control Board  
Siva Tower, Post Box No 457  
No.1/276 Meyyanur Main Road  
Salem 636 004  
Email: [deetnpcbslm@gmail.com](mailto:deetnpcbslm@gmail.com)  
Phone No.04257 2448526
4. M/s Chemplast Sanmar Limited  
Rep by its Director S Ramkumar  
Veerakalpudur Village  
Raman Nagar Post  
Mettur Dam, Salem District 636 403  
Email: [snn1@sanmargroup.com](mailto:snn1@sanmargroup.com)  
Phone No.04298 230381

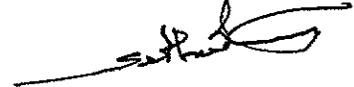
.... Respondents

**MEMO FILED BY THE 4<sup>TH</sup> RESPONDENT**

It is most respectfully submitted that:

1. In the last hearing which took place on 12.4.2022, this Hon'ble Tribunal wanted some clarifications with regard to the conditions prescribed by the MoEF for Hydrogen Peroxide plants of Gujarat Alkalis and Punjab Alkalis. Even though no prior Environmental Clearance (EC) is required for the Hydrogen Peroxide plant of the 4<sup>th</sup> Respondent which has been

For CHEMPLAST SANMAR LIMITED

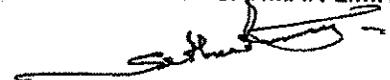


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endorsed by MoEF, given below is the comparative statement of the conditions prescribed for the above mentioned Units with regard to H2O2 Plant and the status of compliance by the 4<sup>th</sup> Respondent for their H2O2 Plant:

	<b>Gujarat Alkalis</b>	<b>Chemplast - H2O2 Plant</b>	<b>Status of Compliance by Chemplast</b>
1.	Recovery of Solvent Ethyl Anthraquinone used in Hydrogen Peroxide Plant shall be through distillation of solvent dissolved in CaCl <sub>2</sub> brine - (EC-condition #3)	We do not have Ethyl Anthraquinone recovery system as it is totally in closed loop system.	Being Closed loop system, the Solvent recovery is in-built and not a stand alone
2.	LDAR program shall be prepared and implemented as per CPCB guidelines - (EC-condition #5)	LDAR program is in place and is being carried out with QCI accredited agency on yearly basis. Last LDAR study done in 2021.	Complied with
3.	Company shall provide effluent treatment plants for different manufacturing plants viz., Hydrogen Peroxide - (EC-condition #25)	The two sources of effluent in the plant are DM unit re-generation and Cooling Tower blowdown. Both the streams are treated in the common ZLD facility and is re-used after treatment.	Complied with
4.	Activated Carbon Adsorption system shall be provided as Air Pollution Control monitoring with solvent recovery unit of Hydrogen Peroxide plant for control of Hydrocarbon (HC) - (EC-condition #40)	Activated Carbon Adsorption system is available and operational. The integrity of operation is being monitored through a competent external agency on periodic basis apart from VOC monitoring at strategic locations on continuous basis.	Complied with
5.	Measures shall be taken to reduce the process vapor emissions as far as possible. All venting equipment shall have vapour recovery system - (EC-condition #45)	Vents from all the atmospheric storage tanks/vessels are properly handled in the Vent gas treatments system consisting of Activated Carbon beds for control of Hydrocarbon emission.	Complied with

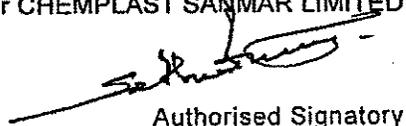
For CHEMPLAST SANMAR LIMITED



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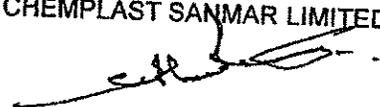
6.	Regular monitoring of VOCs shall be carried out in the work zone area and ambient air - (EC-condition #47)	Online VOC monitors - 3 in the process area and 2 for ambient air are installed in the plant for continuous monitoring of VOC's. The data is also continuously transmitted to State Pollution Control Board through Care Air system. A Complete Ambient Air Quality Monitoring Station has been installed in the plant, which includes VOC monitoring as well.	Complied with
7.	Spent Carbon from Hydrogen Peroxide plant shall be disposed to TSDF -(EC-condition #59)	Hazardous waste authorization for Spent Carbon is obtained and will be sent to TNPCB authorized vendor for co-processing once it is getting generated.	Complied with
8.	Contaminated spent Alumina & activated Carbon from Hydrogen Peroxide Plant shall be disposed to authorized common TSDF site - (EC-condition #61)	Hazardous waste authorization is obtained and Spent alumina is being sent to authorized Cement Manufacturer (Dalmia Cement) for co-processing.	Complied with
9.	Spent Catalyst from Hydrogen Peroxide plant shall be sold to authorized and approved vendors - (EC-condition #62)	Spent Catalyst from the plant will be sent to the manufacturer for Palladium recovery once it is getting generated.	Complied with
10.	Storage of Flammable chemicals shall be sufficient away from the production area - (EC-condition #72)	All the flammable chemicals are stored sufficiently away from the production area (ie. a designated area).	Complied with
	<b>Punjab Alkalis</b>	<b>Chemplast H202 Plant</b>	
1.	Reactor shall be connected to chilled brine condenser system.	Oxidiser reactor is connected to a chilled water condenser.	Complied with

For CHEMPLAST SANMAR LIMITED

  
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2.	Reactor and Solvent handling pump shall have mechanical seals to prevent leakages.	Reactor and Solvent handling pump are having mechanical seals to prevent leakages.	Complied with
3.	The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery.	The condensers are having sufficient HTA and more than 95% recovery efficiency.	Complied with
4.	Solvents shall be stored in a separate space specified with all safety measures.	Solvents are stored separately in a designated area with all required safety measures.	Complied with
5.	Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done.	All the electrical equipment handling solvent are provided with proper earthing system. The integrity of Earthing is being checked on periodic basis.	Complied with
6.	Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.	Motors and electrical fittings falling under Hazardous Area Classification (HAC) and are all flame proof. All the fittings in the solvent storage area also flame proof. We do not have storage tanks for storing solvents. However all the equipment handling the solvents are fixed with breather valves to avoid loss.	Complied with

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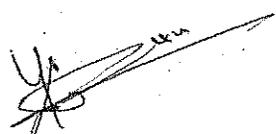


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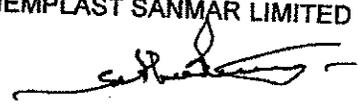
2. From the above statement, it is clear that not only the 4<sup>th</sup> Respondent is in compliance with all the conditions imposed by MoEF for the aforesaid two industries but also in compliance with all the other terms and conditions prescribed by TNPCB for the Hydrogen Peroxide plant as per the Consent to Establish and Consent to Operate issued by them.
3. Additionally, the various special recommendations / conditions as prescribed by the Joint Committee appointed by this Hon'ble Tribunal has also been complied with by the 4<sup>th</sup> Respondent including the various safety measures prescribed by the Joint Director of Industrial Safety and Industrial Health.

It is therefore prayed that this Hon'ble Tribunal may be pleased to record this memo and pass such or other further orders and thus render justice.

Dated at Chennai on this 18<sup>th</sup> day of April, 2022.

  
Counsel for 4<sup>th</sup> Respondent.

For CHEMPLAST SANMAR LIMITED

  
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4<sup>th</sup> Respondent