

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

Original Application No. 17 of 2021 (SZ)

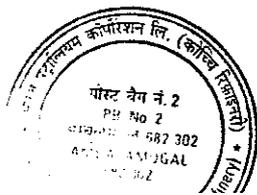
1. Vipin Nath A V
S/o N K Viswanathan
Ammencheril House, Kakkad Kara,
Mamala PO, Ernakulam Dist
Kerala - Pin -682305
2. Sinu C.Jacob
Thondattil House
Kakkad Kara, Mamala PO, Ernakulam Dist
Kereala - Pin-682305

...Applicants

AND

1. M/s.Bharat Petroleum Corporation Limited
Rep. by its General Manager (Public Relations)
(Propylene Derivatives Petrochemical Project -PDPP)
Post Bag No.2, Ambalamugal-
Ernakulam District, Kerala, Pin-682 302
2. Ministry of Environment, Forest & Climate Change
Rep. by its Secretary, Indira Paryavaran Bhavan,
JorbaghRoad, New Delhi
3. Central Pollution Control Board
Rep. by its Member Secretary
'Parivesh Bhawan', East Arjun Nagar,
Shahdara,Delhi-110032
4. Engineers India Limited
Rep. by its Company Secretary & Nodal Officer
El Bhavan, 1, Bhikaiji Cama Place,
New Delhi-110 006, India
5. Kerala State Pollution Control Board
Rep. by its Member Secretary
Pattom P.O., Thiruvananthapuram-695 004
6. Petroleum and Explosives Safety Organization
Rep. by its Chief Controller of Explosives
A Block CGO Complex Fifth Floor Seminary Hills
Nagpur-(Maharashtra)440006
7. OIL INDUSTRY SAFETY DIRECTORATE
Rep. by its Executive Director
8th Floor, OIBD Bhawan, Plot No.2,
Sector-73, Noida, Utar Pradesh-201302
8. DIRECTORTE OF FACTORIES & BOILERS
Rep. by its Director, Suraksha Bhavan
Kumarapuram, Medical College, P.O.
Thiruvananthapuram
Kerala-695 011

...Respondents



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Chief General Manager (Projects)
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**REPLY STATEMENT FILED ON BEHALF OF BHARAT
PETROLEUM CORPORATION LIMITED - 1st RESPONDENT**

It is respectfully submitted as follows:

The address for service of all notices and processes on the 1st Respondent is that of its advocates M/s. King & Partridge, "Catholic Centre", 108, Armenian Street, Chennai 600 001.

1. This Respondent denies all the averments and allegations contained in the Application except those that are specifically admitted hereunder as true and put the applicant to strict proof of the rest.

2. BPCL Kochi Refinery has completed the Propylene Derivatives Petrochemical Project (PDPP) and facilities are under stabilization. This project is a continuation of Integrated Refinery Expansion Project (IREP) which was commissioned in the year 2017 at a cost of ₹14,656 crore. The project will integrate the Refinery with the downstream petrochemical unit at an investment ₹5,246-crore. The project was conceptualized as a part of 'Make in India' initiative which will help the country to reduce imports of niche petrochemical products and will lead to valuable foreign exchange savings.

The products from PDPP units such as Acrylates, Acrylic acid are not currently manufactured in India. There are only few producers of these products in the world and are mostly located in developed countries of Europe, Japan, Singapore, and China etc. Technology licensors for these processes are limited. India is predominantly importing these products at present. Acrylic acid unit of PDPP will be the world's biggest single train facility. Both Acrylic acid and Acrylates unit will be producing Butyl Acrylate and 2-Ethyl Hexyl Acrylate and these will be the first of its kind plants in India, to be set up with imported licensed technology.

The products from PDPP are raw materials for industries such as paints, coatings, adhesives, water treatment and solvents. The PDPP project is expected to attract many ancillary industries getting set up in Kochi. In addition, Government of Kerala has, plans to set up a petrochemical



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park in the vicinity of PDPP to encourage small scale industries getting set up along with PDPP.

3. PDPP units and its facilities are under various stages of commissioning and stabilization. BPCL-KR has taken utmost care to incorporate all the necessary features which ensure safety during normal operations and emergency conditions. Before installation of any such complex Process Plants, detailed studies are conducted through agencies having expertise in these fields and plants are built according to well established design practices/codes incorporating outcome of such studies. The studies include

1. Environmental Impact Assessment (EIA) Study
2. Rapid Risk Assessment study (RRA)
3. Hazard and Operability study (HAZOP) and Assessment of Safety Integrity Level (SIL)
4. Quantitative Risk Assessment study (QRA)
5. Emergency Response and Disaster management study (ERDMP)

4. Various clearances and approvals are obtained from regulatory/ Govt bodies which ensures compliance to applicable rules and standards are as follow:

- Environmental Clearance obtained from MoEF & CC dated 15th May, 2015 vide F.No.J-11011/26/2013 - IA II (I)
- Site Appraisal accorded by Kerala Factories & Boilers Dept. 17th Feb, 2016 vide G.O.(Rt) No 268/2016/LBR, Thiruvananthapuram, Dated 17.02.2016.
- PESO approval for overall plot plan and all equipment layout 07th Dec, 2016 vide P 5(2)496 /Refinery - dated 07-12-2016
- Consent for Establishment obtained from KSPCB 17th May, 2018 vide Consent No: PCB/HO/EKM-2/ICE/02/2018 Dated 17-05-2018
- PESO approval for updated overall plot plan & layouts 11th Sept, 2018 vide P 5(2)496 /Refinery - dated 11-09-2018
- Consent to Operate obtained from KERALA -SPCB 20th Aug, 2019 vide Consent No: PCB/HO/EKM-2/ICO/09/2019 - Dated 20-08-2019
- NOC from Fire and rescue dept. 14th Dec, 2018 vide D1-7904/2016 - Dtd.14.12.2018 from Regional fire office Ernakulam




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- NOC from Local bodies (Village Officer Puthencruz) 14th Nov, 2018 vide Letter No 342- 2018 Dtd.14.11.2018
 - NOC from Additional District Magistrate, Ernakulam 09th Oct, 2020 vide NOC No. 49/2020 Dtd.09-10-2020 (Under rule 144 of Petroleum Rules and OISD 116 guidelines)
 - PESO Commissioning approval for Acrylic Acid Unit 04th Aug, 2020 vide P 5(2)496 /Refinery II - dated 04-08-2020
 - Kerala Factories and Boilers Department 08-May 2019 vide Doc No.T3/10811/2019/F&B/R Dis, Dated 08-05-2019 Permit number 109/2019
 - Kerala Factories and Boilers Department 6-Sept-2020 Amendment of factory license including PDPP project vide Permit No.109/2019 Amendment letter dated 16-Sept-2020.
 - Central Electrical Authority – Approval 13th Mar,2019 & 03rd Oct, 2019
5. Highly automated and integrated control networks and the qualified manpower ensure proper monitoring & control of the plants. Multilayer Mechanical & automated systems ensure safe handling of process emergency conditions. Refinery is having best of the kind fire emergency response unit to handle any unforeseen situations. Various statutory agencies such as PESO, F&B & OISD conduct regular audit of the facilities.
6. A few features of PDPP project that are incorporated to ensure safe handling and disposal of gaseous & liquid effluents are provided below
- Pressure relieving system are connected to flare and the gases are safely disposed at elevated flare stacks.
 - Process vents from units and storage tanks are handled in incinerators
 - There are no fired process heaters or boilers as part of the complex.
 - Clean fuels like RLNG is used as fuel in waste gas and waste liquid incinerators.
 - Stack of these analysers are installed and will be connected to PCB servers



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- All the liquid waste, liquid effluents and the floor wash effluent are collected using dedicated networks and are handled in submerged type waste incinerator.
7. Very sophisticated systems are used to avoid any emission from the fittings/ moving parts such as Pump seals, tank seals, valve packing etc.
- PDPP project employs seal less - Canned pumps for all organic liquid services.
 - Special type of high efficient Karlrez type packing material is used for valve glands to avoid emissions from the valves.
 - All the tanks are closed and any off gas that could be generated are collected through the vents connected to incinerator or flare system where it is safely oxidized.
 - Approx. 350 numbers of gas detectors and 8 numbers of VOC detectors are available for quick detection and continuous monitoring.
 - One exclusive Continuous Ambient Air Quality Monitoring station (CAAQMs) is installed for PDPP project to monitor the ambient air quality at this location
 - The Refinery has a dedicated asset Integrity Management team which have structured monitoring schedules and carry out the scheduled inspections to identify any maintenance needs well in advance.
8. Following measure are available for Noise control
- All installed equipment are properly designed for limiting noise within the unit boundaries as per norms during the normal operation.
 - During the construction and commissioning phase activities, which may cause noise, such as steam blowing / steam venting are addressed by providing silencers. These facilities were further strengthened by in-house modifications carried out as some complaints in this regard were received.

In addition to this, additional barricading was provided above the boundary wall wherever noise complaints were reported



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9. With regard to para 2 and 3, this respondent has denied the allegation mentioned in the application. BPCL has always taken all necessary and timely measures to limit the disturbance caused to the neighbourhood because of construction. During the construction phase, water sprinklers were employed extensively inside the site and nearby areas to suppress dust if any due to construction activities and movement of heavy vehicles. On the fish deaths quoted in para 3, BPCL would like to submit that the process plants of petrochemical complex had not even started its operation that time and products were yet to be produced in the complex. The reason for fish deaths has no relation attributable to any activity inside the complex.

10. With regard to para 4, it is submitted that PDPP Project has paid a high level of attention to contain the escape of volatile organics

- PDPP project employs seal less - Canned pumps for all organic liquid services.
- Special type of high efficient Karlrez type packing material is used for valve glands to avoid emissions from the valves.
- All the tanks are closed and any off gas that could be generated are collected through the vents connected to incinerator or flare system where it is safely oxidized.
- Approx. 350 numbers of gas detectors and 8 numbers of VOC detectors are available for quick detection and continuous monitoring.
- One exclusive Continuous Ambient Air Quality Monitoring station (CAAQMs) is installed for PDPP project to monitor the ambient air quality at this location. However, the plant is yet to be fully operational.

In addition to this, it is submitted that there is no supporting records for the claim that there is severe stench emanating from BPCL plant and people residing around the plant are suffering from fatal respiratory ailments.

11. With regard to para 5, it is submitted that the following measures are available for Noise control

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1. All installed equipment are properly designed for limiting noise within the unit boundaries as per norms during the normal operation.
 2. During the construction and commissioning phase activities which may cause noise such as steam blowing / steam venting are addressed by providing silencers. These facilities were further strengthened by in house modifications carried out as some complaints in this regard were received.
 3. In addition to this additional barricading was provided above the boundary wall wherever noise complaints were reported.
 4. Noise monitoring at this area is carried out regularly and the results are within the applicable limits
12. With regard to para 6, it is submitted that as per the direction of MoEF&CC – PDPP Environment clearance, BPCL has earmarked 40 acres of land for developing green cover and the details of green cover are as below.
- The green belt development had started along with the construction activities and in the first phase, the green belt was developed along both sides of the canal and near the boundary walls in PDPP.
 - The suitable native plant species were procured from the forest nurseries in consultation with a Retried Dy. Forest Conservator.
 - In the second phase, the green belt was developed aggressively around the PDPP areas earmarked as the green belt. The green belt is being developed in the form of various parks such as herbal park, Fruit Parks, Bird parks, Bamboo Parks, etc., inside the PDPP premises.
 - In the final phase of green belt development, the large areas for sapling plantation was limited due to the various site clearance activities. Miwayaki approach was introduced for the faster and dense development of the green belt.
 - In addition to the green belt, various gardens are being developed along the road sides and buildings.

PDPP project has developed sufficient green belt in the facility required as per EC conditions issued by MoEFCC. As committed to MoEFCC, 40



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acres of green belt developed in phased manner which includes Miyawaki forest also.

13. Further with regard to para 6&7, it is submitted that BPCL Kochi Refinery had obtained Environmental Clearance from MoEF& CC vide F.No.J-11011/26/2013 -IA II (I) dated 15th May, 2015. As per Specific Condition -xxi of EC Clearance letter "Green belt shall be developed at least in 40 acres of land in and around the plant premises to mitigate the effects of fugitive emissions all around the plant as per the CPCB guidelines in consultation with DFO. Thick greenbelt with suitable plant species shall be developed around unit. Selection of plant species shall be as per the CPCB guidelines".

14. BPCL has earmarked the 40 acres of the land for complying to the above requirement. As on 15th April 2021 we have already completed development of green belt in an area of 40.1 acres.

The details of year wise plantation incurred are attached as below:

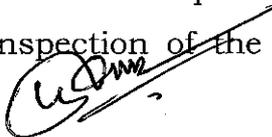
S. No	YEAR (FY)	No. OF SAPLINGS PLANTED	AREA (IN ACRES)	REMARKS
1	2017-2018	700	0.91	Planted under Green Belt Phase I
2	2018-2019	2650	1.84	Planted under Green Belt Phase I
3	2019-2020	697	1.33	Planted under Green Belt Phase II
4	2020-2021	22042	36.02	Planting under Green Belt Phase II
		26089	40.1	

Recent Pictures of green belt are attached as **Annexure-1**

15. With regard to para 8, it is submitted that MoEF &CC has already considered the EIA recommendations and prevailing norms before issuing the Environmental Clearance conditions considering this particular site. The EC for PDPP (F.No.J-11011/26/2013 -IA II (I) dated 15thMay, 2015) which spells clearly about the area requirement for the green belt. As submitted above, the plantation of saplings in green belt for 40 acres is completed.

16. Points in para 9 and 10 are answered in para 6 by this respondent. BPCL understands that the inspection of the project site




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conducted by CPCB on 23.10.2020 and the report submitted on 3.12.2020 was based on observations from outside BPCL Boundary. Green belt is not completely visible from outside the boundary wall. Further to this report, CPCB & KSPCB has conducted a combined site visit inside the PDPP project area on 29.12.2020.

In addition to the above, to the best of our knowledge that there are no existing statutes from regulatory bodies regarding maintenance of buffer zone for Petroleum Refinery / Petrochemical plants. The Environment Clearance (EC) obtained from MoEFCC for PDPP has no stipulations on buffer zone. The Environment Clearance (EC) for the PDPP Project was issued only after scrutiny of the recommendations of Environmental Impact Assessment (EIA) Report, Rapid Risk Analysis (RRA) Report and the Public Hearing. The EC has clearly recommended only 40 Acres of Green Belt in and around PDPP Project site. This requirement has been complied by BPCL.

Further, the claim of KSEB 110 KV High tension line passing through the PDPP site preventing the development of green belt is not factual as the HT line is predominantly passing above the canal which is not hindering the development of green belt on either sides of canal.

17. With regard to para 11, it is submitted that PDPP Units and its facilities are strictly constructed as per OISD / PESO guidelines and all distance criteria have been maintained. Also approvals have been obtained from statutory authorities followed by plant inspections at stipulated intervals.

OISD Distance Norms to Boundary wall		
Sl. No	From	Distance in (mts)
1	Process Unit	60
2	Process control room	30
3	Class A Storage tank	0.5 D Min 20
4	Class B Storage tank	0.5 D Min 20
5	Pressured storage LPG	Max 90
6	Flare	90
7	POL Bulk Loading	Max 20
8	POL Bulk Loading LPG	30
9	Fire Station / First Aid Centre	12
10	Boiler House / Process Unit Heaters	50



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11	Rail spur	30
12	Cooling tower	30
13	Electrical sub Station	15

18. Points in para 12 and 13 are answered in para 6, 7, 8 and 11 by this respondent. Kindly ref. **Annexure - 2** for the approval documents.

19. With regard to para 14, it is submitted that all major facilities / units are under various stages of commissioning and stabilization with the support of foreign national experts from OEMs and Technology Licensors in line with COVID-19 protocols.

20. Pains in para 15 are answered clearly in para 6 and 7 by this respondent.

21. With regard to para 16, it is submitted that, prohibiting habitations to come up within 250-300 meters comes under the purview of Govt. As an industrial installation, BPCL is meeting the distance guidelines stipulated by regulatory bodies.

22. With regard to the contents of Grounds 1 to 6 raised by the applicant are denied completely and the Applicant is put to strict proof of the rest. BPCL has complied with all applicable laws and regulations at all stages of the project.

In addition, the Govt Petitions committee formed an Expert committee for the scientific study of health and safety of the residents living near BPCL Kochi Refinery. The Expert Committee was presided by Shri. APM Mohammed Hanish, IAS, Principal Secretary (Industries), Govt. of Kerala with the following members:

- Prof Shiva Nagendra, Professor, CIVIL engineering Dept, Indian Institute of Technology (IIT), Chennai.
- Dr. R. Venugopal, IPESS, Dy Chief Controller, Petroleum & Safety Organization (PESO)
- Dr. T Mukundan, Scientist-G, Associate Director (Materials), Naval, Physical & Oceanographic Laboratory (NPOL)
- Dr. V Sivanandan Achary, Professor and Director, School of Environment Studies, CUSAT
- Shri. S Suhas IAS, District Colector, Ernakulam (Representative Revenue Dept.)



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- Shri. Santosh Koshy Thomas, Managing Director KINFRA.

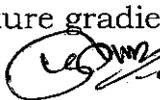
The Expert Committee had site visit at Kochi Refinery and studied the health and safety of the residents living near BPCL Kochi Refinery. The above Committee also reviewed the exclusive Quantitative Risk Assessment study (QRA) report submitted by the independent agency M/s Bureau Veritas Industrial Services (I) Pvt. Ltd, Mumbai. The QRA study extensively covers consequence analysis and hazard distances for all selected failure cases and concludes that the impact of all scenarios are contained within the boundary limits of BPCL Kochi Refinery. Further, with the safety measures that are available with BPCL-KR, the risk falls in "As Low As Reasonably Practical" (ALARP) level.

The above Committee was satisfied with the existing facilities and has submitted the report to the Govt Petitions Committee.

23. With reference to the incident and subsequent analysis report for the Vizag incident, PDPP storage tanks and the related facilities have the following safety features.

1. The tanks containing polymerizing products have been constructed with stainless steel metallurgy and the chemical cleaning/pickling of the tank internals have been conducted for removing rust/other materials that cause polymerization. Such tanks have been constructed as per process licensor data sheets.
2. The polymerizing products/ intermediates are stored in tank farms after addition of required inhibitor contents for preventing polymerization reactions. To support the inhibitor, depleted air (with 8-10 Vol % of oxygen) is added to the tanks. The oxygen concentration of the depleted air is measured with an online analyzer with indication and alarm in the DCS (Distributed Control System) Control Room.
3. Provisions are provided for addition of inhibitors in the tanks in case the concentration is found less. Adequate quantity of inhibitors have been procured and stored in the warehouse facility.
4. The tanks with polymerizing products/intermediates are provided with cold insulation and the tank temperatures are maintained within the permissible limits (18 deg C for Acrylic acid and below 30 deg C for Acrylates) to avoid polymerization reactions. Venturi mixers are provided for mixing the cold liquid from the chiller exchanger with the tank bulk liquid content for ensuring proper mixing and avoiding localized temperature gradients.




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5. The offsite tanks are cooled with refrigerated water from the offsite chiller and ISBL (Inside battery limit) tanks are cooled with water from ISBL chiller system. The chiller system is automatically controlled from the DCS system. Scheme for interconnectivity between the chiller systems has also been proposed for redundancy.
6. Acrylic acid tanks are provided with short stop systems which are used to inhibit and stop the polymerization reactions thereby preventing run away reactions. This imported facility is one of the latest available technologies for handling emergencies in tanks handling polymerizing products.
7. The normal tank breath outs are routed to either the flare or the incinerator system for safe disposal without letting to atmosphere.
8. The indications of parameters such as temperature, pressure, flow and level are provided in the 24x7 manned DCS system. Also alarms are provided to alert the DCS when any of the values go beyond safe limits.
9. Tanks are provided with online temperature indications in DCS. Critical tanks are provided with temperature indications at multiple levels and directions for reading the tank temperature from all parts. This would prevent any localized temperature gradients.
10. Process/safety interlocks are provided in the PLC system for cutting of inlet flow/stoppage of pump/closing of outlet ROV etc.
11. The tank inlet and outlets are also provided with ROV (remote operated valves) which can be closed from DCS or field in case of any emergency/leak scenario.
12. The tanks have been provided with pressure vacuum relief valves and emergency vent systems for prevention against over pressure.
13. Sampling schedules has been incorporated for frequent sampling of the tank contents for detecting any polymerization/ other abnormalities.
14. Dyke enclosures are provided for enclosing the entire content of the largest tank in the dyke.
15. The safety distances (inter tank distance and outside dyke distances) and firefighting facilities are provided confirming to the OISD and other statutory standards.
16. Gas detectors, fire call points, hydrants, monitors, HVLRMS and communication systems are provided for emergency use.
17. The tank operations are carried out following well outlined procedures (SOPs) approved/as advised by the process licensor.
18. The operating personnel/supervisors have undergone proper training about the properties, and handling of emergency scenarios with respect to the tank contents
19. An emergency plan has been developed for the entire facilities of the PDPP project for taking care of emergency scenarios. Also the pre commissioning safety audits has been completed by statutory agencies like OISD, PESO etc. and their recommendations has been complied.




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It is, therefore, most respectfully prayed that this Hon'ble Tribunal may be pleased to dismiss the above application as against the 1st Respondent and thus render justice.

Dated at Kochi on this, the 31st day of May, 2021.

Advocates for 1st Respondent

1st Respondent

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एरणाकुलम जिला, Ernakulam Dist., केरल Kerala



VERIFICATION

I, Ajith Kumar K, Chief General Manager (Projects) of the 1st Respondent herein, do hereby declare that what is stated in the above paragraphs are true and correct to the best of my knowledge, information and belief.

Verified at Kochi on this, the 31st day of May, 2021.

1st Respondent

अजित कुमार के **AJITH KUMAR K**
मुख्य महाप्रबंधक (परियोजना)
Chief General Manager (Projects)
भारत पेट्रोलियम कॉर्पोरेशन लिमिटेड
BHARAT PETROLEUM CORPORATION LTD.
कोच्चि रिफ़ाइनरी KOCHI REFINERY
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