

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

IN

**ORIGINAL APPLICATION NO. 43 of 2017**

**Petitioner** : The Tribunal on its own motion on the  
Implementation of the Bio-Medical Waste  
Management Rules, 2016 in Kerala

Versus

**Respondent(s)** : The State of Kerala & 7 Others

**VOLUME 2**

**Index**

Sl. No	Description	Pages
<b>1</b>	<b>ANNEXURE 1&amp;2</b> : Copies of directions issued to IMAGE by KSPCB dated 22.05.2021 & 22.07.2021	1-4
<b>2</b>	<b>ANNEXURE 3</b> : Copy of the instruction dated 07.12.2021	5
<b>3</b>	<b>ANNEXURE 4</b> : Report on fire incident at IMAGE dated 16.02.2022	6-16
<b>4</b>	<b>ANNEXURE 5</b> : Copy of the Show Cause Notice dated 16.02.2022	17-19

Dated this the 17<sup>th</sup> day of February 2022

**Rema Smrithi**, Advocate  
ADDITIONAL STANDING COUNSEL FOR THE MEMBER CONVENER

**KERALA STATE POLLUTION CONTROL BOARD**

DISTRICT OFFICE, PALAKKAD  
NEAR DISTRICT PANCHAYATH OFFICE, PALAKKAD - 678 001  
[www.keralapcb.nic.in](http://www.keralapcb.nic.in)

In reply please refer to: PCB/PLKD/TG-60/2001

Date: 22-5-21

From

Environmental Engineer

To

M/s IMAGE,  
Behind Gramalekshmi Mudralayam,  
Manthuruthy,  
Palakkad.

Sub: Instructions based on inspection

Sir,

Board officials had inspected IMAGE plant on 19-4-2021 and on 13-5-21. It was found that a back log of yellow bags of waste is there. A part of it lying in the open space outside the incineration sheds. In the context you are instructed to

- i) Take necessary steps to prevent such accumulation of waste and ensure complete treatment and disposal of the waste as per the Rules\
- ii) Store the waste under proper cover so as to protect from rain
- iii) Provide the details of maximum quantity of back-log which occurred, quantity consumed daily and the present status of its disposal
- iv) Provide the details of daily input of COVID and non-COVID waste in the plant for the last two weeks and their disposal.

You are requested to submit reply by email at the earliest.

Yours faithfully,

**Krishnan M N** Digitally signed by Krishnan M N  
Date: 2021.05.22 11:50:23 +05'30'  
ENVIRONMENTAL ENGINEER



2000  
24/7/21

**KERALA STATE POLLUTION CONTROL BOARD**  
കേരള സംസ്ഥാന മലിനീകരണ നിയന്ത്രണ ബോർഡ്  
ജില്ലാ ഓഫീസ്, പാലക്കാട്

DISTRICT OFFICE, PALAKKAD  
NEAR DISTRICT PANCHAYATH OFFICE, PALAKKAD – 678 001  
[www.keralapcb.nic.in](http://www.keralapcb.nic.in)

In reply please refer to : പിസിബി/പിഎൽകെഡി/ഐസി/സിഒ-240/2008

തീയതി: 22/07/2021

**ഭരണഭാഷ-മാതൃഭാഷ**

പ്രേഷകൻ

എൻവയോൺമെന്റൽ എഞ്ചിനീയർ

സ്വീകർത്താവ്

മെമ്പർ ട്രസ്ക്രട്ടറി,  
കേരള സംസ്ഥാന മലിനീകരണ നിയന്ത്രണ ബോർഡ്,  
തിരുവനന്തപുരം.

വിഷയം:- ഇമേജ് - പ്രവർത്തനം - കോവിഡ് മാലിന്യ നിർമാർജ്ജനം - സ്ഥിതിവിവരം.  
സൂചന:- 1. മെമ്പർ ട്രസ്ക്രട്ടറിയുടെ 07.07.2021 തീയതിലെ

പിസിബി/എച്ച്ഒ/പിഎൽകെഡി/ഐസി/62/08 നമ്പർ കത്ത്.

2. മെമ്പർ ട്രസ്ക്രട്ടറിയുടെ 05.04.2021 - ലെ

പിസിബി/എച്ച്ഒ/പിഎൽകെഡി/ഐസി/62/08 നമ്പർ കത്ത്.

3. മെമ്പർ ട്രസ്ക്രട്ടറിയുടെ 19.05.2021 ലെ PCB/HO/EE2/BMW-03/  
General/202 (Vol.II).

4. ഈ ഓഫീസിൽ നിന്ന് 22.04.2021-ന് ചീഫ് എൻവയോൺമെന്റൽ എഞ്ചിനീയർ,  
കോഴിക്കോട് മുഖാന്തിരം ആ ഓഫീസിലേക്കയച്ച് കത്ത്.

സർ,

സൂചന 1 കത്ത് പ്രകാരം ഇമേജും കെഇഐഎല്ലും സംബന്ധിച്ചുള്ള പുരോഗതിയും

സൂചന 2 കത്ത് പ്രകാരം ഇമേജ് ZLD കൈവരിച്ചതിന്റെ പുരോഗതിയും റിപ്പോർട്ട് ചെയ്യാൻ

ആവശ്യപ്പെട്ടിരുന്നു. സൂചന 3 പ്രകാരം ജില്ലയിലെ CBWTF പരിശോധിക്കാൻ

ചീഫ് എൻവയോൺമെന്റൽ എഞ്ചിനീയർ മുഖാന്തിരം ആവശ്യപ്പെട്ടിരുന്നു. സൂചന 4 പ്രകാരം

ഈ ഓഫീസിൽ നിന്ന് 22.04.2021 വരെയുള്ള ഇമേജിന്റെ പുരോഗതിയും കോവിഡ്

മാലിന്യത്തിന്റെ ആധിക്യം മൂലമുള്ള പ്രയാസങ്ങളും റിപ്പോർട്ട് ചെയ്തിരുന്നു.

ഇവയുടെയെല്ലാം തുടർച്ചയും പുരോഗതിയുമായി താഴെ പറയുന്ന കാര്യങ്ങൾ അറിയിക്കുന്നു.

05.07.2021 ന് ബോർഡ് ഉദ്യോഗസ്ഥർ ഇമേജ് സന്ദർശിച്ചു. പ്രതിദിനം ശരാശരി

20 മുതൽ 22 ടൺ വരെ കോവിഡ് മാലിന്യവും 10 മുതൽ 15 ടൺ നോൺ കോവിഡ്

മാലിന്യവും ആണ് ഇപ്പോൾ വരുന്നതെന്ന് പരിശോധിച്ചറിഞ്ഞു. ബാക്ക്ലോഗിന്റെ (Backlog)

Handwritten signature and date: 22/07/21

വലിയ ശേഖരം ഇപ്പോഴും ബാക്കിയുണ്ടെന്നും പ്രതിദിനം 10 ടൺ വരെ ബാക്ക് ലോഗിംഗ് നിന്നും എടുത്ത് ഇൻസിനറേറ്റ് ചെയ്യുന്നുവെന്നും അവർ അറിയിച്ചു. അപ്രകാരം ഇന്നിപ്പോൾ 4 മുതൽ 5 മാസം കൊണ്ടേ ബാക്ക് ലോഗ് തിരികെയുള്ളൂവെന്ന് അറിയിക്കുന്നു. പിപിഇ കിറ്റുകൾ പൊടിച്ച് ഇൻസിനറേറ്റ് ചെയ്യുന്നത് പരീക്ഷണാടിസ്ഥാനത്തിൽ ചെയ്തു നോക്കി. ഇൻസിനറേഷൻ തോത് വർദ്ധിപ്പിക്കുന്നതിനാണ് ഇത് ചെയ്തത്. എന്നാൽ PP (പോളിപ്രോപിലീൻ) കൊണ്ടുള്ള PPE അങ്ങനെ കത്തുമ്പോൾ ഉണ്ടാകുന്ന വളരെ ഉയർന്ന താപനില കാരണം ഇൻസിനറേറ്ററുകൾ കേടുവരുന്നതായി കണ്ട് ആ ശ്രമം ഉപേക്ഷിച്ചു. സന്ദർശന ദിവസം 7 ഇൻസിനറേറ്ററുകളിൽ 6 എണ്ണം പ്രവർത്തിക്കുന്നതായും ഒരേണ്ണം മുൻ നിശ്ചയിച്ച കേടുപാടുതീർക്കൽ (Scheduled Maintenance) ആയതുകൊണ്ട് പ്രവർത്തിക്കാതിരിക്കുന്നതും കണ്ടു.

6 എണ്ണത്തിൽ 2 എണ്ണം പൊലുഷൻ കൺട്രോൾ ബോർഡിന്റെ അനുമതി (Consent to Operate) ലഭിക്കാത്തതാണ് എന്നും കാണുന്നു. ഇത് രണ്ട് ജോടി ബേണിംഗ് ചെയ്മ്പറുകൾ (പ്രൈമറിയും സെക്കന്ററിയും) വെച്ചുവെച്ചായും റേറ്റിംഗ് കൂട്ടും വായു മലിനീകരണോപാധികൾ (APCD) ഇവക്ക് പൊതുവായും ഉള്ള Incinerators ആണ്.

പ്ലാന്റ് 1 ALPHA ROTARY WITH DRY SCRUBBING നന്നായ് പ്രവർത്തിക്കുന്നതായി കണ്ടു, emission കാഴ്ചയിൽ തീർത്തും വിമലമായിരുന്നു. അതിലെ ഘടന - Primary Rotary Chamber (2 nos), secondary vertical chamber, cyclone dust collector, lime reactor, gas cooler (using coolant & cooling tower) bag-filters, packed bed scrubber (optional), 30m stack എന്നിവയാണ്. ഈ Incinerator മുതലായ APCD technology ഉപയോഗിക്കുന്നതും താരതമ്യേന പുതിയതും ആയതുകൊണ്ട് പ്രത്യേകം വിശദീകരിച്ചു എന്നു മാത്രം.

ടാർപോളിൻ വച്ച് മുടിയ തീതിയിൽ ബാക്ക്ലോഗ് മാലിന്യം പുറത്ത് ശേഖരിച്ചിട്ടുണ്ട്. Autoclaving, sorting പ്രവർത്തിക്കുന്നുണ്ട്. Sharps കോൺക്രീറ്റ് പിറ്റിലും ഭാഗികമായി ഉരുകാനും ആഗ്രഹി നിർമ്മാർജ്ജനം ചെയ്യുന്നു. റീസൈക്കിളിംഗിന് കൊണ്ടു പോകാനുള്ള പ്ലാസ്റ്റിക്, കൃഷി, എന്നിവ ചാക്കുകളിൽ ശേഖരിച്ചിട്ടുണ്ട്. എല്ലാ മാലിന്യ ഡാഗുകൾക്കും QR code scan ചെയ്യുന്നുണ്ട്.

കോവിലി മാലിന്യം വരുന്ന മുറയ്ക്ക് തന്നെ (പ്രമാവധി 24 മണിക്കൂറിനുള്ളിൽ) ഇൻസിനറേറ്റ് ചെയ്യുന്നുണ്ട്.

എഫ്ജുവന്റ് ട്രീറ്റ്മെന്റ് പ്ലാന്റ് പ്രവർത്തിക്കുന്നുണ്ട്. അശുഭാ ഫിൽട്രേഷൻ കഴിഞ്ഞ് മുഴുവൻ വെള്ളവും പുനരുപയോഗിക്കുന്നു. ട്രീറ്റ്ഡ് എഫ്ജുവന്റ് ജലസേചനത്തിന് ഉപയോഗിക്കുന്നില്ല. അങ്ങനെ ZLD കൈവരിച്ചിട്ടുണ്ട്.

കാർഡ് ലോഗി  
ഇനിയും  
കിട്ടുകൾ  
നോക്കൂ  
PP  
ന

25 കെഎൽഡി എഫ്ജുവൻ്റ് ട്രീറ്റ്മെൻ്റ് പ്ലാന്റും പ്രവർത്തിക്കുന്നുണ്ട്. കാന്റീൻ, ടോയ്ലറ്റ് മലിനജലമാണ് സീവേജ് ട്രീറ്റ്മെൻ്റ് പ്ലാന്റിൽ സംസ്കരിക്കുന്നത്. ഇതിൽ നിന്നുമുള്ള ശരാശരി 8 കെഎൽഡി സംസ്കരിച്ച മലിനജലം ജലസേചനത്തിന് ഉപയോഗിക്കുന്നു. എഫ്ജുവൻ്റ് ട്രീറ്റ്മെൻ്റ് പ്ലാന്റ്, സീവേജ് ട്രീറ്റ്മെൻ്റ് പ്ലാന്റ് എന്നിവയിൽ ശേഖരിച്ച സംസ്കരിച്ച മലിനജലത്തിൻ്റെ സാമ്പിൾ പരിശോധനയുടെ ഫലം ഉള്ളടക്കം ചെയ്യുന്നു. രണ്ടു ഫലങ്ങളും നിശ്ചയിച്ച പരിധികൾക്കുള്ളിലാണ്.

വിശ്വസ്തതയോടെ,



എൻവയോൺമെൻ്റൽ എഞ്ചിനീയർ

ഉള്ളടക്കം: മേൽ പറഞ്ഞപ്രകാരം

പകർപ്പ്: ചീഫ് എൻവയോൺമെൻ്റൽ എഞ്ചിനീയർ,  
കേരള സംസ്ഥാന മലിനീകരണ നിയന്ത്രണ ബോർഡ്,  
റീജിണൽ ഓഫീസ്,  
കോഴിക്കോട്. (ഇ-മെയിൽ മാത്രം)

DESPATCHED

5

Date: 08/12/2021

Phone : 0491 - 2505542

E-mail : kspcbpalakkad@gmail.com



## KERALA STATE POLLUTION CONTROL BOARD

കേരള സംസ്ഥാന മലിനീകരണ നിയന്ത്രണ ബോർഡ്

ജില്ലാ ഓഫീസ്, പാലക്കാട്

DISTRICT OFFICE, PALAKKAD

NEAR DISTRICT PANCHAYATH OFFICE, PALAKKAD - 678 001

[www.keralapcb.nic.in](http://www.keralapcb.nic.in)

In reply please refer to : PCB/PLKD/IC/CO-240/2008

Date : 07/12/2021

From

The Environmental Engineer

To

M/s. IMAGE  
Behind Gramalakshmy Mudralayam,  
Manthuruthy, Kanjikode West,  
Palakkad - 678623.

Sub :- Existence of backlog and incineration without Consent to Operate.

Sir,

During the inspection of the board officials at your plant on 25/11/21, it was observed that,

- 1) A considerable quantity of BMW is still there as backlog.
- 2) New incinerator which has not obtained the Consent to Operate, but has obtained Consent to Establish only, is being operated.

These are non-compliance with Consent Rules and Guidelines. You are directed to implement the following urgently,

- 1) The backlog BMW shall be processed within a maximum of 30 days
- 2) The newly installed incinerator shall obtain Consent to Operate.

Yours faithfully,

ENVIRONMENTAL ENGINEER

Date : 16.02.2022

**REPORT ON FIRE INCIDENT AT IMAGE, THE CBWTF AT PALAKKAD, IN JAN 2022**

The Common Biomedical Waste Management Facility (CBWTF) IMAGE, Manthuruthy, Palakkad had a fire incident on 16.01.2022. The Yellow type Bio-Medical Waste accumulated in a storage shed caught fire. IMAGE reported that the fire was spread into the plant premises from bush fire in the adjacent forest land.

Board Officials reached the site within an hour of the incident. A storage shed was filled with Bio-Medical Waste. The waste was under fire. The Fire Force was spraying water on the heap, but the fire was not subsiding. They could only prevent the spread of fire outside that building to other parts of the plant. No other part of the plant including buildings housing incinerators, autoclaves, Effluent Treatment Plant, sorting – sheds, administrative buildings etc. did come into contact with fire. The Bio-Medical Waste being in plastic bags was burning without any respite even after continuous spraying of water.

IMAGE has a consented capacity to treat 55.8 tons of Bio-Medical Waste per day. It has five incinerators, sufficient number of autoclaves, other processing equipments and an effluent treatment plant of capacity 400 kilolitres per day. It receives Bio-Medical Waste from all over the State. From the start of the first wave of Covid-19 in 2020 IMAGE started to receive considerably larger quantities of waste. The quality of the waste also changed drastically due to the presence of more percentage of synthetic materials in the Yellow bags, to be incinerated. This led to operational difficulties in the incinerators. More breakdowns started to happen. Thus the plant was unable to process its full capacity in those days. The situation continued with the onset of second wave of Covid-19 in 2021. Thus backlog of waste to be incinerated started to develop. State Pollution Control Board had noticed this building of backlog and had issued certain instructions to the unit to eliminate this backlog. Letters dated 22.05.2021 and 07-12-2021 were issued to the unit. Even a part of the backlog could be seen stored in open during visit on 09.04.2021 and 13.05.2021 and they were instructed on 22.05.2021 to immediately cover it so as to protect it from rain, otherwise considerable polluted water will emanate. On 07.12.2021

they were instructed to process the backlog within a period of 30 days maximum. Copies of these letters are enclosed. To those instructions, IMAGE used to reply that the excessive quantities received had led to the backlog. They used to submit that

- The Covid-19 Bio-Medical Waste was being received in separate bags and separate vehicles which could not be checked for proper segregation or pre-weighed due to its extremely infectious nature.
- Almost entire Covid-19 Bio-Medical Waste was arriving in Yellow bags, mostly containing a few non-incineration type waste as well. This created operational problems in incinerators and frequent maintenance problems.
- The lack of number of employees during lockdown periods affected the plant's performance.
- The extreme stress during Covid times in the health sector led to more percentage of improper segregation of waste, again, which could not be promptly corrected due to the volatile situation.

The autoclaved recyclable waste after segregation is packed in white coloured plastic bags. This will be loaded into vehicles and handed over to authorized recyclers. During the period after the pandemic as well there has been certain delay in transporting out the autoclaved waste. This resulted in a small backlog of autoclaved waste as well, which were to be handled over to recyclers.

The burning waste was sprayed with enormous quantity of water by the fire department. But the waste being in highly combustible nature, due to the presence of plastic inside and in the form of packets the fire was not getting subsided. The fumes generated in the burning were getting transported in approximately westward direction. Adjacent to the plant in westward direction it is forest land. Beyond that also it is uninhabited areas for about 2 km radial distance. So human inhabitations was not affected by the fumes.

On the same day as fire started by 6pm, ambient air monitoring for the parameters PM<sub>10</sub>, NO<sub>2</sub> and SO<sub>2</sub> were started in the nearest possible building where electricity connection made

could be available. The instrument could not be set in the windward direction due to non availability of sites or stations to fix the machines and availability of electricity. 24 hour ambient air monitoring was done from 6pm on 16.01.2022 to 6pm on 17.01.2022 for these parameters.

The results of the monitoring were obtained as follows.

Days of Monitoring- 16-1-2022 (6 pm) to 17-1-2022 (6 pm)				
Sampling station- A building near the IMAGE plant outside the plant premises				
Parameter	PM 10	SO2	NO2	
24 hour average concentration (microgram per cubic metre)	25.35	2	4.5	
National Ambient Air Quality Standards* (microgram per cubic metre)	100	80	80	

- Standards for areas other than Ecologically Sensitive Areas declared by the competent Authority

The monitoring had a major limitation. The boundary of the IMAGE premises on the west side is forest land, which was very near the building under fire. So installing a monitoring equipment at the boundary of the premises in the wind direction was impossible as it was highly unsafe. The electricity lines to that side was also cut. So an extended wire also could not be taken to supply electricity. Thus the monitoring station was located at a building immediately outside the plant premises, approximately 300m from fire, on the Northern side.

It could be seen that the Standards are not exceeded for any of the measured parameters. But, due to the limitations mentioned, the result cannot be relied to base any inference on exact impact on air quality due to the fire. Also, on the Northern side towards the monitoring station, heavy vegetation with canopy-type trees was there, which would have absorbed the pollutants.

Detailed inspection was conducted in the IMAGE plant and premises after the initial panic of fire had subsided. The following were the main observations

1. The size of the storage shed which caught fire is 35m x 40m. The Bio-Medical Waste has been stacked inside the shed with an average height of 4.5m. Thus the total volume of the Bio-Medical Waste is 6300m<sup>3</sup>. The unit weight of the Bio-Medical Waste was calculated using a vehicle and weigh bridge in the plant itself and it was obtained as 0.3 tons/ m<sup>3</sup>. Based on this, total quantity of the Bio-Medical Waste which caught fire was estimated to be 2000 tons. Bio-Medical Waste was also stacked outside, abutting the building. It was reported by the IMAGE that the Bio-Medical Waste accumulated inside the building and abutting the building were being taken for incineration everyday and the backlog was being reduced day by day until the day of fire incident.
2. The entire Bio-Medical Waste that caught fire is of Yellow type as per the Rules. During the peak Covid pandemic and continuing days, the Covid Bio-Medical Waste was given preference and it was being incinerated on the day itself. The non-Covid Bio-Medical Waste- Yellow- was being stacked like this.
3. Outside the sheds, near the autoclaving sheds, some stacks of autoclaved / disinfected Bio-Medical Waste could be seen in open. These are Bio-Medical Waste packets taken out and stored after autoclaving. During the pandemic period, as well as after that, many hospitals were doing faulty segregation of Bio-Medical Waste. So even in red packets, many incinerable waste were coming. Such dry incinerable waste which came in red packets were autoclaved, separated manually, put in new packets and was being stored in this region. So these Bio-Medical Waste was also being taken day by day and the volume was getting reduced until the day of fire incident. Adjacent to that many autoclaved/recyclable waste also seen stocked.

Immediately, from 19.01.19 onwards, Board started a detailed monitoring for the presence of dioxins and furans in the ambient air, soil, vegetation etc. The fire was still burning during the monitoring. The sampling and analysis are being done by the NIIST, Thiruvananthapuram, one of the few laboratories in the Govt. sector with facilities for monitoring and analysing dioxins and furans. The following samples were collected and analysis is progressing

- Assessment of ambient air levels of dioxins-like POPs (PCDD/F/dl-PCBs) and heavy metals in selected sites in and around the CBWTF plant.
- Quantification of dioxin-like POPs and heavy metals in the burned residues and fly ash depositions from the fire occurred zone.
- Assessment of dioxin-like POPs levels and heavy metals in the vegetation, surface soil and sediments in and around the fire-occurred building.

The monitoring results will give the quantification of the environmental damage. The results are yet to be obtained from NIIST, as the analysis involves meticulous process where most modern instrumentation is used.

The processing plants of IMAGE were not affected by the fire. So, on the day of the fire, and the subsequent days, processing of BMW is being continued as normal. Image is collecting waste regularly from all the institutional affiliated to it. All the incinerators are operational, autoclave is operational, plastic waste shredding, bailing, cleaning are also operational. In short, the collection, transport, treatment and disposal of BMW in the State from the institutions affiliated to IMAGE has not been affected by the fire at all. During the fire and the subsequent days, the autoclaved recyclable waste was being continued to be taken to authorised recyclers. Also the periodic movement of incineration ash to the TSDF for Hazardous Waste was also progressing.

The fire and the consequential smoldering subsided fully only after 10 days only. The site was inspected finally on 29<sup>th</sup> January and it was found that even generation of smoke had subsided. The entire ash generated during the fire has been transferred to ash storage area, for transfer to TSDF.

Photos of the incident, with date and description, are attached.

IMAGE has been served with Show Cause Notice dated 15.02.2022 to show cause why actions under the Acts and Rules including imposing Environmental Compensation shall not be initiated for violating the Bio-Medical Waste Rules by storing untreated Bio-Medical Waste much beyond 48 hours. They had not complied the instructions in Board's letters dated 22.05.2021 and 07.12.2021 as well. Further actions will be initiated based on the reply to the notice.

**ENVIRONMENTAL ENGINEER**

Fire Accident at IMAGE, on 16-01-2022 - Photos



Waste storage shed when fire started \_16-01-2022



Initial hours of fire \_ 16-01-2022



Disinfected and sorted BMW stored for transportation to recyclers, not affected by fire\_16-01-2022



Disinfected BMW stored in open due to backlog of waste to be transported to recyclers\_16-01-2022



Disinfected BMW in open, faulty sorting during peak Covid pandemic, contains both recyclables and non recyclables\_16-01-2022



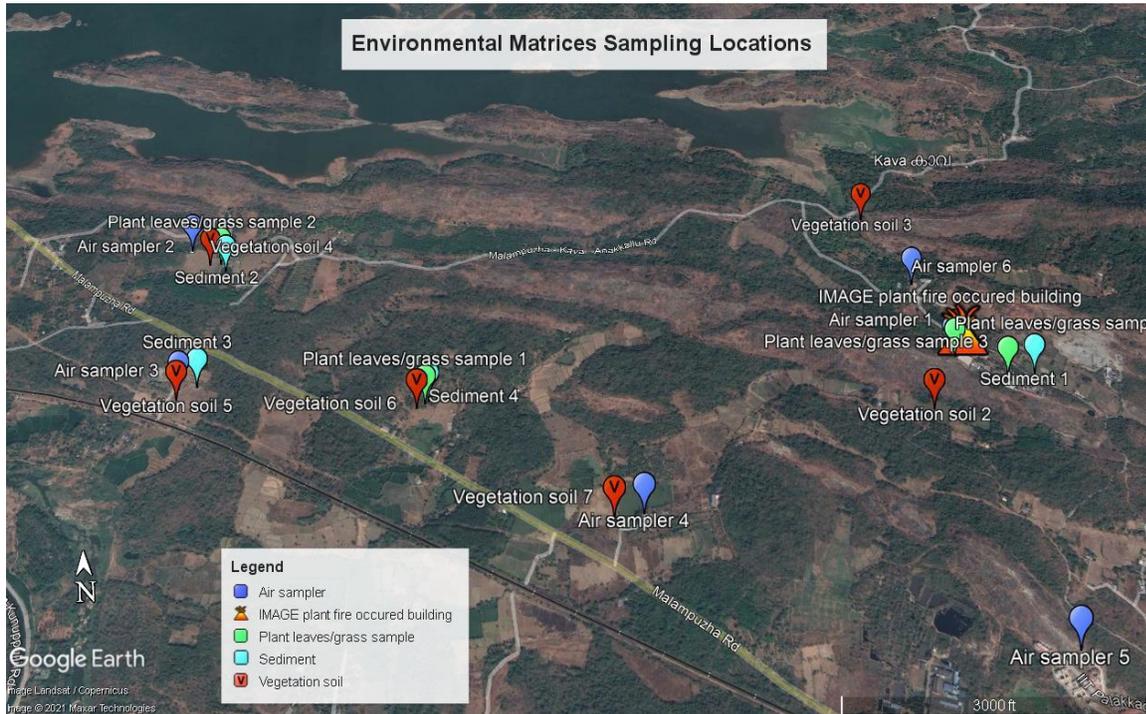
Fire continuing in night\_16-01-2022



Fire continuing after 24 hours\_17-01-2022



After all fire and smoldering had subsided, ash removal progressing\_29-01-2022



Environmental matrices sampling locations- monitoring by NIIST – 19-01-2022

**KERALA STATE POLLUTION CONTROL BOARD**

കേരള സംസ്ഥാന മലിനീകരണ നിയന്ത്രണ ബോർഡ്

ജില്ലാ ഓഫീസ്, പാലക്കാട്

DISTRICT OFFICE, PALAKKAD

NEAR DISTRICT PANCHAYATH OFFICE, PALAKKAD – 678 001

[www.keralapcb.nic.in](http://www.keralapcb.nic.in)**Regd.with A/D**

Ref.No. PCB/PLKD/IC/CO-240 /2008

**SHOW CAUSE NOTICE**

WHEREAS Kerala State Pollution Control Board is the statutory authority for administration of the Water (Prevention & Control of Pollution) Act, 1974, Air (Prevention & Control of Pollution) Act, 1981 and the Environment (Protection) Act, 1986 in the state of Kerala ;

WHEREAS IMAGE, a Common Biomedical Waste Treatment Facility (hereinafter referred to as “the facility”) located at Manthuruthy, Near Gramalekshmi Mudralayam, Pudussery Panchayath, Palakkad comes under the purview of the Board and is bound to comply with the conditions of the Consent to Operate / Authorisation issued thereunder;

WHEREAS IMAGE possesses Consent to Operate dated 06.09.2018 integrated with Authorisation under the Water (Prevention & Control of Pollution) Act, 1974, Air (Prevention & Control of Pollution) Act, 1981, Environment (Protection) Act, 1986 and Bio-Medical Waste Management Rules, 2016 valid upto 30.06.2023;

WHEREAS Board Officials had found backlog of biomedical waste stored without disposal beyond 48 hours of generation, in the facility during inspections on 19.04.2021, 13.05.2021 and 25.11.2021;

WHEREAS Board had issued letter dated 22.05.2021 instructing you to prevent accumulation of Biomedical Waste and not to store Biomedical Waste in open without roof;

WHEREAS Board had issued letter dated 07.12.2021 in which you were instructed to completely clear the backlog of bio-medical waste within a maximum period of 30 days;

WHEREAS a Fire accident happened the facility on 16/01/2022 which continued for almost 7 days until the fire and smoldering was completely stopped;

WHEREAS Board Officials had witness the fire incident from 16.01.2022 onwards and had continuously observed the developments till the end of fire and smoldering;

WHEREAS the waste which caught fire was Yellow category (waste to be incinerated) biomedical waste (BMW) stored in a storage shed;

WHEREAS it could be assessed that the shed which caught fire had contained approximately 2000 tons of BMW (type Yellow) based on the unit weight of Bio-Medical Waste and the size and volume of the shed;

WHEREAS considerable quantity of Yellow category waste were found outside this shed also as during earlier inspections;

WHEREAS the fire has caused extremely huge quantities of uncontrolled emissions which escaped into the surrounding environment, forest and agricultural lands and it may have reached the human inhabitation areas eventhough far away from the unit;

WHEREAS considerable quantities of ash which may contain hazardous contents might have got deposited in the surrounding environment including the forest and agricultural land;

WHEREAS the Bio-Medical Waste Management Rules, 2016 stipulates that bio-medical waste shall not be stored beyond 48 hours; Yellow category waste should have been incinerated within 48 hours at the maximum and such a huge backlog should not have got generated;

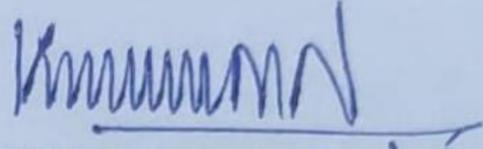
And WHEREAS your inability to dispose the bio-medical waste within 48 hours as per the Rules has resulted in a huge backlog which had led to the fire incident;

THEREFORE you are directed to Show Cause within 7 days of receipt of this notice why actions under the Water (Prevention & Control of Pollution) Act, 1974, Air (Prevention & Control of Pollution) Act, 1981, Environment (Protection) Act, 1986 and Bio-Medical Waste Management Rules, 2016, including imposing Environmental Compensation (EC) for non-compliance with Rules and damage caused, if any, shall not be initiated against you;

Dated this the 16<sup>th</sup> day of February, 2022.

For and on behalf of the  
KERALA STATE POLLUTION CONTROL BOARD



  
ENVIRONMENTAL ENGINEER

**Krishnan M.N**  
Environmental Engineer

To

M/s. IMAGE, Manthuruthy, Near Gramalekshmy Mudralayam,  
Kanjikode West, Palakkad.

Copy to:

1. Secretary, IMAGE, IMA State Headquarters, Anayara P.O.,  
Thiruvananthapuram – 695029.
2. The Chairman, Kerala State Pollution Control Board, Thiruvananthapuram  
(by email); for information
3. The Chief Environmental Engineer, Kerala State Pollution Control Board,  
Regional Office, Kozhikode; (by email); for information