

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

Original Application No.70 of 2020 [SZ]

IN THE MATTER OF

Tribunal on its own SUO MOTO based on the News item in The New Indian Express, Chennai edition dated 16.05.2020, "Ammonia leak from the Madras Fertilizers Limited Worries residents, in Chennai's Manali" ...Applicant

-Vs-

Union of India, rep. by its Environment and Forests and Climate Change, New Delhi and others. ...Respondents

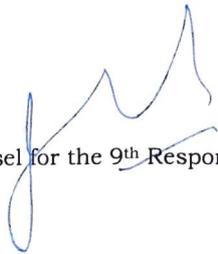
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Certified to be true copies of the original

Dated at Madras this the 8th day of September, 2021

Counsel for the 9th Respondent



Compliance Status Report of Madras Fertilizers Limited

(As per Hon'ble National Green Tribunal, Southern Zone, Chennai Order in OA no. 70/2020)

As per Joint Committee report dt 23.08.2021 submitted to NGT, out of 17 suggestions 9 works has been complied. 6 works are under progress and the remaining 2 works are at initial stage.

In this regard our clarifications are given below:

3 Compliance Status of the directions issued by TNPCB;

Item No.	Directives per TNPCB	Status as per Joint Committee report dt 23.08.2021 submitted to NGT	MFL reply as on Sep 01, 2021
a	The unit shall provide RO plant for the entire quantity of trade effluent generated from Cooling Tower as Cooling Water Blow down (4800KLD), Boiler Blow down (30KLD) and DM plant regeneration (300KLD) as reported which is one of the CEPI long term action plan.(Target: January 2021)	Yet to comply: Installation work of RO system under progress. The industry is having three RO systems for treatment of secondary treated sewage procured from Kodungaiyur STP. At present, the industry is partially procuring TTRO water from Kodungaiyur STP, so one RO system (line A) is in standby, this line A is presently used to treat above said wastewater generated from the industry until commencement of new dedicated RO system. The industry committed to comply by December 2021.	As one of the existing RO stream is dedicated for treating CW B/D and is in service, it is to be considered as complied . New plant installation is in progress and will be completed on Dec 2021.
b	The unit shall connect all EMFMs provided to Care Air Centre, TNPCB and CPCB(Target: January 2021)	Yet to Comply. The industry committed to comply by December 2021.	Vendor finalised, Expected completion by Dec 2021.
c	The unit shall replace the furnace oil usage with LNG for the two utility boilers of capacities 55 T/ Hr each to reduce the emissions.(Target: June 2021)	Yet to Comply. The industry committed to comply by February 2022.	Award of Contract has been issued on June 16, 2021 to M/s Thermax, Pune. Material supply and Installation period is 8 months. Hence, the entire process will be completed by Feb 2022.
d	The unit shall restore the CAAQMS station with the sensor parameters such as PM10, PM2.5, SOx, NOx, CO, NH3& O3as the one station near North gate is in operation and connected to CAC, Chennai and another station near ETP is in partial operation. The remaining stations	Complied, but yet to establish online connectivity with TNPCB/ CPCB server. The industry committed to complete connectivity by August 2021.	Complied. Connectivity made to TNPCB/CPCB server on 01.09.2021.

	were not in operation since, 2016 due to Vardha Cyclone.(Target: March 2021)		
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4. The following recommendations are suggested by the committee for not complying with AAQ Standards and exceeding the discharge norms of source emission from utility boiler

Committee Directives complied as per JC report:

ii) Proper fuel to air combustion ratio should be maintained to keep down the NOx generation in the boiler.

iii) All liquid wastes (water in the gutter) should be properly treated and recycled into the process, so that stripping of ammonia from the process water can be minimized.

v) The unit must take continuous effort on monitoring the plant and carrying out periodical inspection of the valves, gaskets, and pipelines of the ammonia and urea plant to avoid ammonia leakages in the plant.

x) The hazardous waste facility should be provided with leak/spill management systems to avoid any accidents that may occur due to spillage.

xi) The spacing between the containers can be increased as per the provision given by CPCB.

xii) Additional shed can be constructed to store the hazardous waste containers and spent catalyst accumulated in the hazardous waste shed so that storage of these wastes in open space can be avoided.

xiii) The waste containers must also be named along with the characteristics of the hazardous waste stored so that the safety protocols can be followed accordingly during transportation and handling of the waste.

Status of directives in progress:

Item No.	Directives per Committee	Status as per Joint Committee report dt 23.08.2021 submitted to NGT	Status per MFL as on Sep 1, 2021
i	On-line monitoring at critical emission points shall be installed to provide information about the effect of malfunctions in the process and consequently the process conditions can be corrected.	Partially Complied. Installation of CEMS analyser in 110 ATA PCB common stack is completed. In Boiler 1 & 2 common stack yet to complete. The industry committed to complete by August 2021.	Complied. Boiler 1 & 2 common stack CEMS installed on Aug 18, 2021 (Annexure 1).
iv	The unit has provided collection tank for process water spillage/seepage and informed, the collected water is taken back for treatment. But during inspection, it is observed that the spillage water is collected through the	Yet to comply. The unit is not collected the spillage/seepage flowing through storm water drain, though the unit has provided collection tank. The unit is disposing the spillage/seepage on land for open percolation. The unit is yet to provide pipeline for conveying the	Complied. Separate line has been provided to recover leaky process water and already submitted the proof for the same (Annexure 2). Water spillage collected in a sump thru a storm water drain is being pumped back to CW BD plant thru a separate line and no water is

	storm water drain, so the unit shall provide separate drains for spillage & storm water.	same for treatment and recycling.	being disposed to land.
vi	The unit shall revamp the plant equipment and re-design the process to abate the pollution problem.	Yet to comply.	Revamp study project has been awarded to the process licensor M/s Haldor Topsoe and waiting for the final report.
vii	As the unit's NPK fertilizer manufacturing buildings and utilities including pipelines are in dilapidated condition and requires complete revamping.	Yet to comply.	Already study has been carried out by M/s PDIL for Rehabilitation of NPK plant structures. Structure strengthening is being carried out in a phased manner.
viii	The unit shall obtain authorization under the provisions of Hazardous & Other Wastes (Management, & Trans boundary Movement) Rules 2016.	Yet to Comply. The industry has re-submitted application to TNPCB on 07.07.2021.	Complied. Already we have submitted the application to TNPCB for approval. In TNPCB report dt 25.08.2021 Sl No. 6 (g) submitted to NGT, it is mentioned as complied.
ix	The unit shall take necessary action for disposal of spent catalyst.	It was informed that validity of HW Authorization expired on 23.11.2014, since then the spent catalyst generated is stored in the unit premises. The unit shall take necessary action for disposal of spent catalyst.	Order was placed for the disposal of all the spent catalyst thru TNPCB authorised recyclers on 03.02.2021. Spent catalyst disposed details: Spent Catalyst Available: 166.77 MT Spent Catalyst disposed : 61.60 MT Remaining Quantity at site : 105.17MT The remaining quantity also will be disposed in the same manner at the earliest.

	Directives/ suggestions by TNPCB	Directives/ suggestions by Joint Committee	Total no of directives /suggestions
Total no of directives / suggestions	4	13	17
Completed	2	10	12
Order placed and in progress	2	3	5

We summarise that majority of the directives have been completed in spite of Covid-19 pandemic situation and order has been placed for the rest of the items.

Ambient Air quality norms complied: The joint committee constituted by Hon'ble NGT in the OA 256/2000 (South Zone) conducted AAQ survey & source emission monitoring at MFL during 29.03.2021 to 31.03.2021 and the analysed result has shown that source emission of Utility Boiler and AAQ are meeting the prescribed standards.

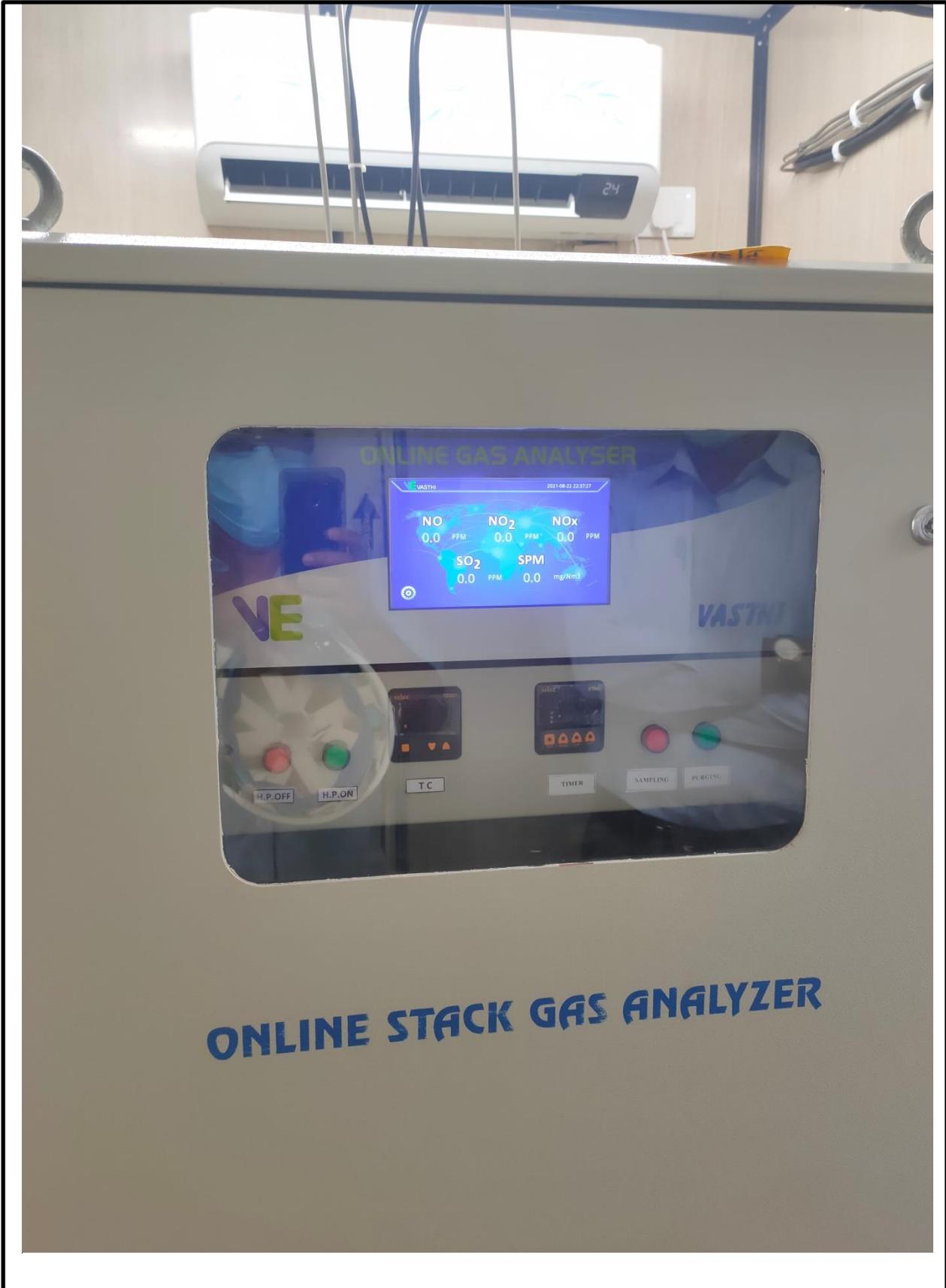
CSR Activities: In spite of huge financial crisis, MFL has done many CSR activities to the tune of Rs. 26.56 lacs during the year 2017 -20 and Rs. 9.95 lacs during 2020-21. Recently we have installed Medical Oxygen plant @ a cost of Rs. 40 lacs at Stanley Government Hospital, Chennai to save the people from Covid-19 pandemic situation.

Feed stock and Boiler Fuel conversion to Natural Gas: It is noteworthy to mention that we have converted Ammonia plant feedstock from Naphtha to Natural Gas and 2nos F.O fired boilers to Natural gas fired during the year 2019 thereby reducing CO₂, Sox, NOx and particulate matter emissions. Also, award of contract has been issued to M/s Thermax for converting one of the Utility Boiler fuel firing from fuel oil to Natural gas.

All the above projects have been carried out with huge investment to reduce the environment impact. MFL will continue to take many more initiatives and system improvement to protect the environment.

Considering the above compliance of emission norms, CSR activities & environmental care taken by MFL, Hon'ble NGT may consider our case sympathetically and waive the Environmental compensation likely to be imposed on MFL as we are striving hard to come out of the financial crisis. Also, give us sufficient time to complete all the activities as some of the directives like Revamp study may require longer duration, being a project.

Photos of Boiler 1 & 2 CEMS installation



Line (G1801) provided for recovery of process Water leak if any

