

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI.**

Original Application No. 70 of 2020 (SZ)

Tribunal on its own motion
SUO MOTU Based on the
News item in the New Indian Express Newspaper
Chennai Edition Dated 16.05.2020, "Ammonia leak from Madras
Fertilizers Limited Worries residents in Chennai's Manali"

-Vs-

1. Union of India,
Rep. by its Secretary,
Ministry of Environment and Forests and
Climate Change, New Delhi and Others.

... Respondents

S. No	Description	Page No.
1.	REPORT FILED ON BEHALF OF THE 7 th RESPONDENT – TAMILNADU POLLUTION CONTROL BOARD.	1 – 20

Advocate for the Respondent: TNPCB

Tr. S. Sai Sathya Jith,

Advocate, Chennai.

BEFORE THE NATIONAL GREEN TRIBUNAL,
SOUTHERN ZONE AT CHENNAI

Original Application No. 70 of 2020 (SZ)

Tribunal on its own motion
SUO MOTU Based on the
News item in the New Indian Express Newspaper
Chennai Edition Dated 16.05.2020, "Ammonia leak from Madras
Fertilizers Limited Worries residents in Chennai's Manali"

-Vs-

1. Union of India,
Rep. by its Secretary,
Ministry of Environment and Forests and
Climate Change, New Delhi and Others.

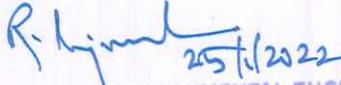
... Respondents

REPORT FILED ON BEHALF OF THE 7th RESPONDENT –
TAMILNADU POLLUTION CONTROL BOARD.

I, R. Rajamanickam, S/o. P.M.Ramasamy, Hindu, aged about 56 years, having my office at No.76, Mount Salai, Guindy, Chennai-32, do hereby solemnly affirm and sincerely state as follows:

1. I am the Joint Chief Environmental Engineer, Tamil Nadu Pollution Control Board, Chennai-32, and I am filing this Report on behalf of the 7th Respondent, Tamil Nadu Pollution Control Board and as such I am well acquainted with the facts of the case as per the records.

2. It is respectfully submitted that the Hon'ble NGT in its order dated 08.07.2021 in O.A.No.70 of 2020 has directed the following:


25/1/2022
JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMILNADU POLLUTION CONTROL BOARD,
No.76, MOUNT SALAI, CHENNAI-600 032.

“Para 7: The 9th respondent as well as the committee and the State Pollution Control Board are directed to file their further progress cum compliance cum action taken report to this Tribunal on or before 25.08.2021.

Para 8: In the mean time, the State Pollution Control Board is also directed to submit a status of resubmission of application for authorization submitted by the 9th respondent as well.”

3. It is respectfully submitted that the Board had earlier issued the following directions to the unit M/s. Madras Fertilizers Limited, S.F.No.212 to 248, Manali Village, Thiruvottiyur Taluk, Chennai District vide Board's Proc. dated 20.05.2020 for strict compliance:

- i. To restart the unit only after installation of at least two ammonia sensors at the rear end of the unit (i.e) towards the village direction where complaint received.
- ii. To restart the unit only after obtaining approval of updated safety audit report containing the information specified in schedule-8, from the competent authority notified in schedule-5 as per rule 10 of the Manufacture, Storage and Import of Hazardous Chemical Rules 1898 as amended.
- iii. The unit shall comply with all the directions issued vide, Board's Proceeding No.T1/TNPCB/F.0214AMB/RL/W&A/2019-1, dated:12.05.2020.

4. It is respectfully submitted that, in due compliance of the Hon'ble NGT order dated 08.07.2021, the unit was inspected by the officials of the TNPCB on 03.08.2021 and the status of compliance of the directions vide Board's Proc. dated 20.05.2020 and the compliance status of the Joint Committee recommendations is as follows:-


 25/11/2022
 JOINT CHIEF ENVIRONMENTAL ENGINEER
 TAMILNADU POLLUTION CONTROL BOARD,
 No.75, MOUNT SALAI, CHENNAI-600 032.

Compliance status of the directions issued by TNPCB (Details as on 19.08.2021)			
Sl. No	Directions issued by the TNPCB vide Proc. dated 20.05.2020	Compliance Status furnished by M/s.MFL as on 31.07.2021	Remarks of TNPCB
(i)	To restart the unit only after installation of at least two ammonia sensors at the rear end of the unit towards the village direction where complaint received.	Job completed. In total all eleven sensors have been installed.	Complied. The unit has installed eleven ammonia sensors within the unit premises in all directions to measure the real time value of ammonia in the ambient air.
(ii)	To restart the unit only after obtaining approval of updated safety audit report containing the information specified in Schedule-8 from the competent authority notified in Schedule-5 as per the rule 10 of the Manufacture, Storage and Import of Hazardous Chemical Rules 1989 as amended.	Job completed. Details: Safety Audit completed and submitted the report to DISH (Directorate of Industrial Safety & Health)	Complied. The unit has furnished the safety auditor report.
(iii)	The unit shall comply with the all the directions issued by the TNPCB Proc. Dated 12.05.2020.		
1.	The unit shall operate and maintain the sewage treatment plant (CETP as stated by the unit) components efficiently and continuously so as to achieve the treated sewage standards prescribed by the board consistently and ensure that the treated sewage is completely utilized for gardening within the unit premises without	Job completed. Details: The treated sewage samples collected from STP by the TNPCB in the past periods are meeting all the standards prescribed by the Board.	Complied. The unit is operating and maintaining the sewage treatment plant (CETP as stated by the unit) components continuously so as to achieve the treated sewage standards prescribed by the Board. The treated sewage is completely utilized for gardening within the unit premises without any stagnation.


 25/11/2022
 JOINT CHIEF ENVIRONMENTAL ENGINEER,
 TAMILNADU POLLUTION CONTROL BOARD,
 No.76, MOUNT SALAI, CHENNAI-600 032.

	any stagnation.		
2.	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.	<p>Job completed.</p> <p>Details: One of the existing RO stream dedicated to treat CWBD.</p> <p>New Plant: Proposed RO plant for Cooling water Blow Down Treatment plant equipment erection job is in progress in which instruments like Flow meter, monitoring sensors for TDS and pH are part of the project. Expected completion: Dec 31, 2021.</p>	<p>Not Complied.</p> <p>Installation of RO plant is under progress. The unit is having three RO system for treatment of secondary treated sewage procured from Kodungaiyur STP. At present, the unit is partially procuring Tertiary Treated RO permeate (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 unit until commencement of new dedicated RO plant. The unit committed to comply by December 2021.</p>



RO plant erection works in progress

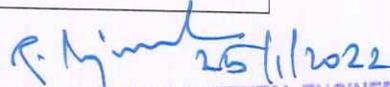
3.	The unit shall ensure zero liquid discharge of trade effluent, thereby no discharge of untreated/treated trade effluent on land or into any water bodies either inside or outside the premises at any point of time.	<p>Job completed.</p> <p>Details: Gutters have been constructed inside the plants to be used as storm water drain. The water from gutter is collected in a Gutter water recovery sump and pumped back to Cooling Water Blow Down plants. Hence, under normal operating conditions no water will be discharged to the ground. Steam condensate and steam leakages are being attended</p>	<p>Not Complied.</p> <p>The entire storm water channels are filled with process leakage water leading to old lagoon and the same shall be collected and pumped to ETP. The unit has provided collection tank for collection of process leakage water leading to old lagoon, whereas the unit is yet to provide pipeline for conveying the</p>
----	--	---	--

R. N. Jeyaraj
25/11/22
JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMILNADU POLLUTION CONTROL BOARD,
No.76, MOUNT SALAI, CHENNAI-600 032.

		as and when it occurs and not connected to storm water drain. Steam condensate lined up to CT basin.	same for treatment and recycling.
4.	The unit shall connect all EMFMs provided to Care Air Centre, TNPCB and CPCB.	<p>Job initiated. There are 12 points where the new EMFMs are going to be installed –</p> <p>(i) CWBD plant I/L and O/L (2 No.s), (ii) RO Main I/L, Permeate O/L and Reject O/L (3 No.s), (iii) ETP I/L and O/L (2 No.s) (iv) CETP I/L and O/L (2 No.s), (v) TTP I/L and O/L (2 No.s) and (vi) TTRO supply (1 No.)</p> <p>Details: Tender floated for supply & installation on 21.12.2020. Due to the non-fulfilment of pre-bid criteria by all the vendors, the tender had to be cancelled and subsequently tender was re-floated on 09.04.2021. Technical evaluation is completed. Price bid will be opened and AOW given to the selected vendor. Due to Covid-19, procurement process is getting delayed. Expected to be completed by Dec 2021.</p>	<p>Not Complied.</p> <p>The unit committed to comply by December 2021.</p>
5.	The unit shall stop the discharge of underground pipe line leakages (Fire water) into old SEP's (lagoons) and to plant green belt by planting native & local specific species immediately.	Job completed.	<p>Not Complied.</p> <p>The entire storm water channels are filled with process leakage water leading to old lagoon and the same shall be collected and pumped to ETP. The unit has provided collection tank for collection of process leakage water leading to old lagoon, whereas the unit is yet to provide pipeline for conveying the same for treatment and</p>


 25/1/2022
 JOINT CHIEF ENVIRONMENTAL ENGINEER
 TAMILNADU POLLUTION CONTROL BOARD,
 No.76, MOUNT SALAI, CHENNAI-600 032.

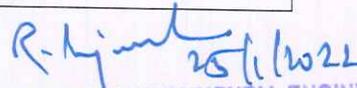
			recycling.
6.	The unit shall replace the furnace oil usage with LNG for the boilers of capacity 55T/Hr each before June 2020, as reported.	Job initiated. Details: Tender floated in Feb 2021 and Bid submission time was extended based on Bidder's request. Bids opened on 30.03.2021. AOW issued on June 16, 2021 to M/s Thermax, Pune. Material supply and Installation period is 8 months. Hence, the entire process will be completed by Feb 2022.	Not Complied. The unit committed to comply by February 2022.
7.	The unit shall apply for renewal of authorisation under the provisions of Hazardous & Other Wastes (Management & Trans boundary Movement) Rules 2016.	Job initiated. Details: As suggested by TNPCB, an Agreement entered with TNPCB authorised recyclers and application resubmitted on 07.07.2021 for Authorisation. Awaiting Authorisation from TNPCB.	Complied. The unit has applied for authorization and processing of application is in progress.
8.	In order to prevent the formation and accumulation of toxic gases inside the tanks and to prevent the occurrence of fatal accidents, while cleaning the tanks, adequate ventilation arrangements should be provided in all the concealed tanks located both above and below ground level which are meant for storing/ holding the effluents, rejects, sludge, permeate water and raw water etc., The sludge accumulated in the ETP components should be cleaned mechanically only and manual cleaning of the sludge should not be carried out	Job completed. Details: Cleaning of sludge is being carried out by Mechanical means only. Vehicle with suction motors employed.	Complied. The unit is carrying out cleaning of ETP components through mechanical means.


 25/1/2022
 JOINT CHIEF ENVIRONMENTAL ENGINEER
 TAMILNADU POLLUTION CONTROL BOARD,
 No.76, MOUNT SALAI, CHENNAI-600 032.

	under any circumstances.		
9.	The unit shall obtain & furnish certificate of stability from the competent authority as notified in sub rule (3) of rule 12 B of the Tamil Nadu Factories Rules, 1950 for the pollution abatement measures provided in the unit.	Job completed.	Complied. The unit has obtained certificate of stability from the competent authority.
10.	The unit shall complete the target of Action taken details are short term and long term action plan in CEPI area as committed by the unit without fail.		
10(I) SHORT TERM ACTION PLAN			
Action plan	Completion target	Compliance status furnished by the MFL as on 31.07.2021	Remarks of the TNPCB
Feed stock conversion from Naphtha to LNG which will reduce energy consumption of ammonia and urea plants.	August 2019	Job completed.	Complied. Naphtha to LNG implemented.
110T/hr ATA and process condensate boiler fuel change from Furnace oil to LNG.	August 2019	Job completed.	Complied. Fuel replaced with LNG.
Construction of a sump to recover all the water let out into the gutter which will be pumped to the cooling water blow down treatment plant where it will be treated and used for cooling water makeup.	December 2019	Job completed. Details: Gutter water recovery sump about 100KL capacities constructed. Gutters have been constructed inside the plants to be used as storm water drain. The water from gutter is collected in a gutter water recovery sump and pumped back to cooling water blow down plants. Hence, under normal operating conditions no water will be discharged to the	Not Complied. The entire storm water channels are filled with process leakage water leading to old lagoon and the same shall be collected and pumped to ETP. The unit has provided collection tank for collection of process leakage water leading to old lagoon, whereas the unit is yet to provide pipeline for conveying the same for treatment and recycling.


 25/11/2022
 JOINT CHIEF ENVIRONMENTAL ENGINEER
 TAMILNADU POLLUTION CONTROL BOARD,
 No. 75 MOUNT SALAI, CHENNAI-600 032.

		ground. Steam condensate and steam leakages are being attended as and when it occurs and not connected to storm water drain. Steam condensate lined up to CT basin.	
Dedicated RO to treat cooling water blow down plant outlet.	June 30, 2020	<p>Job completed. Details: One of the existing RO stream dedicated to treat CWBD.</p> <p>New plant: Civil structure completed. Equipment erection job is in progress. Due to Covid-19 lockdown restrictions the vendor could not come on a regular basis. Expected to be completed by Dec 2021.</p>	<p>Not Complied. Installation of RO plant is under progress. The unit is having three RO system for treatment of secondary treated sewage procured from Kodungaiyur STP. At present, the unit is partially procuring Tertiary Treated RO permeate (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 unit until commencement of new dedicated RO plant. The unit committed to comply by December 2021.</p>
10(II) LONG TERM ACTION PLAN			
Action plan	Completion target	Compliance status furnished by the MFL as on 31.07.2021	Remarks of the TNPCB
Increasing Green Belt area	1 acre to be brought under green belt every year.	<p>Job initiated. Details: 150 saplings planted this year. Another 90 saplings planted near South gate area on June 5, 2021. Additionally 60 saplings were planted opposite to Admin Block and Training</p>	<p>Complied. However, the unit is to further develop green belt to attain 40% of the total area as the unit is located in CEPI area.</p>


JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMILNADU POLLUTION CONTROL BOARD,
No.76, MOUNT SALAI, CHENNAI-600 032.

		centre. MFL has developed about 55 acres of Green Belt area within a short span of two years and will continue to mitigate the effects of fugitive emissions from all the Plants as per CPCB guidelines	
	Change of fuel from furnace oil to RLNG for boiler 1 and 2 (55T/hr each)	July 31, 2020 Job initiated. Details: Tender floated in Feb 2021 and Bid submission time was extended based on Bidder's request. Bids opened on 30.03.2021. AOW 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.	Not Complied. The unit committed to comply by February 2022.
11.	The unit shall continue develop green belt by identifying land through Revenue department and always the native species shall be planted.	For Green belt development, 150 new tree saplings planted this year on June 5, 2021. Already developed 55 acres of Green Belt. This process will be continued to increase the Green belt area every year utilizing the available land inside MFL.	Complied. However, the unit is to further develop green belt to attain 40% of the total area as the unit is located in CEPI area.
12	The unit shall undertake CSR activities with priority to provide drinking water facility, computer facilities and adequate toilet facilities in girls' schools and colleges to encourage women education especially in rural and semi urban	Job completed. Details: CSR activities are carried out every year. For the year 2021-22 a Medical Oxygen plant costing Rs. 36 lakhs was installed on July 1, 2021 in Govt. Stanley Hospital, Royapuram in aid of Covid-19 patients. Manali and Mathur village public (about 125 No.s costing Rs.50000/-) were provided with Rice and groceries on June 17, 2021.	Complied. The unit has been advised to undertake the CSR activities regularly to the surrounding public.

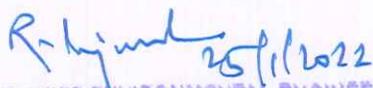
	areas.		
13.	The unit shall provide reverse plastic vending machines in prominent public places so as to collect waste plastic bottles so as to achieve the target of banning one time use and throw plastics in Tamil Nadu and encourage recycling options.	<p>Job initiated.</p> <p>Details: Tender Floated on December 22, 2020 and PO issued on 21.01.2021 and amended on 03.02.2021 as per Vendor's request. The vendor did not respond in spite of several mails and phone calls. The PO was cancelled and fresh procurement action is initiated.</p>	<p>Not Complied.</p> <p>The unit committed to comply by December 2021.</p>
14.	The unit shall operate and maintain the existing air pollution control measures provided to the emission sources efficiently and continuously so as to achieve the Ambient Air Quality/ Stack Emission standards prescribed by the board.	<p>Complied.</p> <p>Details: As per IIT report the PM emission from urea demister. NPK and Ammonia plant boiler stacks are well within the limits except Utility boiler stack. The reasons for high PM emission values are due to excess oxygen used for combustion in boiler. Hence, It is clarified that higher PM emission is not actual but due to O2 value used for calculating PM values. Apart from the above, the concentrations of HF, CO, NO2 and SO2 are well below the national standards.</p> <p>Ambient air quality was measured at 11 locations and values are within the limits in 7 locations. At 4 locations, the PM exceeded limits per report which are located in the direction of SE-NW. Out of 4, 2 Nos. are placed at NW and 2 Nos. are located of SE direction of Utility boiler. Hence, higher PM in ambient air could be due to other industries which are located surrounding our factories on NW and SE directions. Because the PM values are within norms for the analysers located on N, NE, W,</p>	<p>Complied.</p> <p>The unit is operating and maintaining the existing air pollution control measures provided to the emission sources continuously so as to satisfy the Ambient Air Quality / Stack Emission standards prescribed by the Board.</p>

R. Rajan
25/1/2022
JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMILNADU POLLUTION CONTROL BOARD,
No.76, MOUNT SALAI, CHENNAI-600 032.

		SW and SW. Also, periodical stack samples are being taken by TNPC Board. The ROA of AAQ (8 stations) and stack Emissions (6 sources) monitoring survey conducted by the board lab on 04.03.2020 & 05.03.2020 reveals that the parameters are well within the standards prescribed by the Board.	
15.	The unit shall ensure that the online stack sensors provided for the parameters NH ₃ in urea prill tower and HF & PM in NPK train care calibrated regularly & operated and ensure that the output of the sensors are connected to TNPCB & CPCB server all times.	Job completed.	Complied. The unit has provided OCEMS for the emission parameters NH ₃ in Urea prill tower and HF & PM in NPK train and maintaining regularly & calibrated periodically to ensure that the output of the sensors are connected to TNPCB & CPCB server at all times.
16.	The unit shall re-commission the NPK train A & B only after installation of HF & PM online stack sensors in the stack attached to each train.	Yes, both NPK train A & B are not in operation.	NPK train A&B are not in operation at present.
17.	The unit shall install PM analyser for the common stack attached with process condensate boiler 70T/hr & 110T/hr boiler and PM, SO _x & NO _x analyser for the common stack	Job completed for Process Condensate and 110 ATA boilers stack PM data connected to care air centre and CPCB. For boiler 1 & 2 CEMS analyser, Installation was under progress. The erection Engineer got affected with Covid-19 and work got suspended. Now with the Covid-19 situation being at ease, installation has been resumed and	Partially Complied. The unit has installed PM analyser (CEMS) for the common stack attached with process condensate boiler 70T/hr & 110T/hr boiler and connected to CAC, TNPCB & CPCB servers. Installation of CEMS

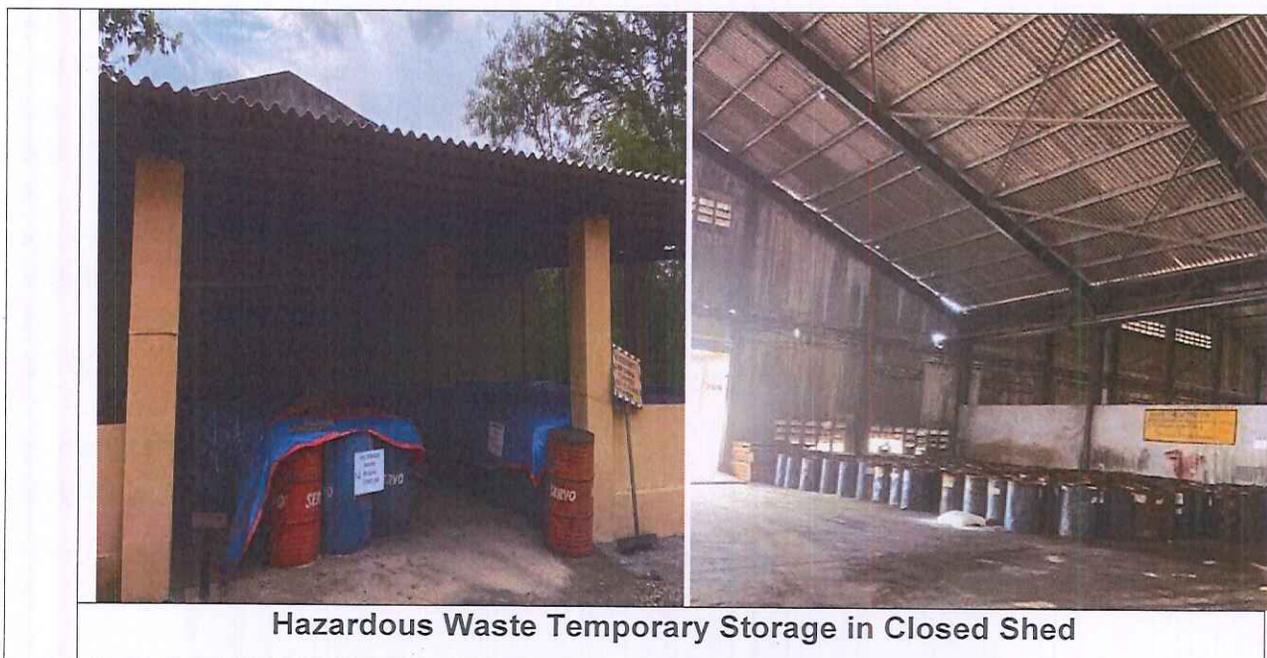

 25/1/2022
 JOINT CHIEF ENVIRONMENTAL ENGINEER
 TAMILNADU POLLUTION CONTROL BOARD,
 CHENNAI 600 022

	attached with boiler 1 & 2 (55T/ hr each) as reported.	in progress. Expected to be completed by August 2021.	for the parameters PM, SOx & NOx analyser for the common stack attached with boiler 1 & 2 (55T/ hr each) are in progress and committed to comply by August 2021.
18.	The unit shall install 11 Nos. of new ammonia sensors in the ambient air on or before June 2020 as reported as the existing 10 ammonia sensors were not functioning since, 2015 due to Vardha Cyclone.	Job completed. Details: Connected to TNPCB.	Complied. The unit has installed 11 Nos. of new ammonia sensors in the ambient air.
19.	The unit shall restore the CAAQMS station with the sensor parameters such as PM10, PM2.5, SOx, NOx, CO, NH3 & O3 as the one station near North gate is in operation and connected to CAC, Chennai and the remaining four stations were not in operation since 2016 due to Vardha Cyclone.	ETP station (Southwest) made ready with all the 6 parameters (PM ₁₀ , PM _{2.5} , SO ₂ , NOx, CO and O ₃) working. Meteorology parameters are also included in this station. Details: Regarding the installation of remaining three new stations at i) Near workshop (North East) ii) South Gate (South East) and iii) Ammonia watch Tower (South West), Installation of all the analysers (PM ₁₀ , PM _{2.5} , SO ₂ , NOx, CO, O ₃ and NH ₃) including Ammonia completed and calibration is in progress by the vendor M/s Environment SA. Communication to TNPCB / CPCB to be established. Expected to be completed by August 2021.	Partially Complied. One CAAQM station near North gate with the sensors parameters such as PM10, PM2.5, SOx, NOx, CO & O3 is in operation and connected to CAC, Chennai. Another CAAQM station near ETP in Southwest direction is made ready with all the 6 parameters (PM ₁₀ , PM _{2.5} , SO ₂ , NOx, CO and O ₃) and is working now. Meteorology parameters are also included in this station. Regarding the installation of remaining three new CAAQM stations at i) Near workshop (North East) ii) South Gate (South East) and iii)


 25/1/2022
 JOINT CHIEF ENVIRONMENTAL ENGINEER
 TAMILNADU POLLUTION CONTROL BOARD,
 No.76, MOUNT SALAI, CHENNAI-600 032.

			<p>Ammonia watch Tower (South West), Installation of all the analysers (PM₁₀, PM_{2.5}, SO₂, NO_x, CO , O₃ and NH₃) completed and calibration is in progress by the vendor M/s Environment SA. Communication to TNPCB / CPCB to be established. The unit committed to comply by August 2021.</p>
			
CAAQM station			
20.	<p>The unit shall rectify the roof defects in the temporary Hazardous waste storage shed for the proper storage of hazardous waste till its disposal.</p>	<p>Job completed. Details: MFL has rectified the roof defects. In general, the waste oil and spent catalyst drum will be very less in numbers and more free space will be there. During Feed stock conversion in June 2019, huge quantity of spent catalyst (130 MT) was generated. This has forced MFL to store them in the open area temporarily (but stored in closed drums). Once this is sold, our storage requirement will be very less hence the existing shed is sufficient. However as per NGT committee recommendations, MFL will increase the storage area too.</p>	<p>Complied. The unit has rectified the defects in the temporary Hazardous waste storage shed for the proper storage of hazardous waste.</p>


25/1/2022
JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMILNADU POLLUTION CONTROL BOARD,
No.76, MOUNT SALAI, CHENNAI-600 032.



Hazardous Waste Temporary Storage in Closed Shed

Compliance status on recommendations suggested by the committee for not complying with AAQ Standards and exceeding the discharge norms of source emission from utility boiler

Sl. No	Committee recommendations	Unit's reply	Remarks of the TNPCB
1.	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.	Installation of CEMS analyser in 110 ATA PCB comm. on stack is completed and working fine. CEMS analyser installation in Boiler 1 and 2 common stack is being carried out by M/s Vasthi Instruments. The erection engineer got affected with Covid-19 and work got suspended. Now with the Covid-19 situation being at ease, installation has been resumed. Expected to be completed by August 2021.	Partially Complied. The unit has installed PM analyser (CEMS) for the common stack attached with process condensate boiler 70T/hr & 110T/hr boiler and connected to CAC, TNPCB & CPCB servers. Installation of CEMS for the parameters PM, SOx & NOx analyser for the common stack attached with boiler 1 & 2 (55T/ hr each) are in progress and committed to comply by August 2021.
2.	Proper fuel to air combustion ratio should be maintained to keep down the NOx generation in the boiler.	Job completed.	Complied.
3.	All liquid wastes (water in	Gutters have been	Complied.

R. Vijay
25/11/2021
JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMILNADU POLLUTION CONTROL BOARD,
No.76, MOUNT SALAI, CHENNAI-600 032.

	the gutter) should be properly treated and recycled into the process, so that stripping of ammonia from the process water can be minimized.	constructed inside the plants to be used as storm water drains. The water from Gutter is collected in a Gutter Water Recovery Sump and pumped back to CWBD plant. Hence under normal operating conditions no water will be discharged to the ground. Steam condensates and steam leakages are being attended as and when it occurs and not connected to storm water drain. Steam condensate lined up to CT basin.	
4.	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 storm water drain, so the unit shall provide separate drains for spillage & storm water.	Collection tank for process water spillage / seepage is a temporary measure. Separate line provided from Ammonia plant to recover spillage directly to CT Basin.	Not Complied. The entire storm water channels are filled with process leakage water leading to old lagoon and the same shall be collected and pumped to ETP. The unit has provided collection tank for collection of process leakage water leading to old lagoon, whereas the unit is yet to provide pipeline for conveying the same for treatment and recycling.
5.	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.	Job completed. Corrosion monitoring of Process pipelines are being carried out and replacement done during Annual Turnaround or as and when on need basis on recommendations of Inspection section. Process safety relief valves are calibrated by External agencies during	Complied.


 25/11/2021
 JOINT CHIEF ENVIRONMENTAL ENGINEER
 TAMILNADU POLLUTION CONTROL BOARD,
 No.76, MOUNT SALAI, CHENNAI-600 032.

		Annual Turnaround.	
6.	The unit shall revamp the plant equipment and re-design the process to abate the pollution problem.	A contract for carrying out a revamp study for Energy reduction in MFL Ammonia plant has been awarded to Process Licensor, Haldor Topsoe. Awaiting for their Final Project report.	Not Complied.
7.	As the unit's NPK fertilizer manufacturing buildings and utilities including pipelines are in dilapidated condition and requires complete revamping.	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.	Not Complied.
8.	The unit shall obtain authorization under the provisions of Hazardous & Other Wastes (Management, & Trans boundary Movement) Rules 2016.	Application for authorisation has been filed and the queries raised by TNPCB are answered and application resubmitted on 07.07.2021. Awaiting authorisation from TNPCB.	Complied. The unit has applied for authorization and processing of application is in progress.
9.	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.	All the formalities have been completed as per TNPCB directions. Awaiting HW authorization from TNPCB.	Complied. The unit is disposing the Hazardous waste to the authorized recyclers.
10.	The hazardous waste facility should be provided with leak/spill management systems to avoid any accidents that may occur due to spillage.	HW storage facility with leak / spill management will be taken up as per Committee's recommendation.	Complied.
11.	The spacing between the containers can be increased as per the provision given by CPCB.	Compliance will be ensured	Complied.


 25/11/2022
 JOINT CHIEF ENVIRONMENTAL ENGINEER
 TAMILNADU POLLUTION CONTROL BOARD,
 No.76, MOUNT SALAI, CHENNAI-600 032.

12.	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	In normal conditions, MFL's generation of Spent catalyst is not regular on yearly basis but as and when required. The accumulated storage in 2015 was only 31 MT. This could not be sold due to want of HW Authorisation. Moreover, during Feed stock conversion which happened in June 2019, an additional volume of huge quantity of spent catalyst (130 MT) was generated. This has made the overall accumulation of 166 MT of spent catalyst which forced MFL to store them in the open area. Once this is sold, our storage requirement will be very minimum which can be accommodated/stored in the existing shed. However as per Committee recommendation MFL will increase the storage area.	Complied.
13.	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	It is being followed	Complied.

5. It is respectfully submitted that, from the above it is observed that the unit has not complied some of the conditions stipulated in the directions issued vide Board's proceeding dated 20.05.2020 and the joint committee recommendations.


 25/1/2022
 JOINT CHIEF ENVIRONMENTAL ENGINEER
 TAMILNADU POLLUTION CONTROL BOARD,
 No.76, MOUNT SALAI, CHENNAI-600 032.

6. It is respectfully submitted that, the unit has not furnished any AAQ/stack emission monitoring survey report conducted either through TNPCB Lab or any other approved labs till 28.03.2021 for verifying the compliance of emission norms. However, in the matter of O.A. No. 256/2020, the NGT (SZ), Chennai has directed the six industries in Manali area to verify the compliance of AAQ as well as source emission, in which the said unit is also one of the industry, where monitoring was carried out during 29.03.2021 to 31.03.2021 by the approved Laboratory as directed by the Joint Committee and the report of analysis shows that the source emission of utility boiler and the AAQ/Stack Emission Monitoring survey are meeting the prescribed standards.

Therefore, Environmental Compensation for further period from 18.11.2020 to 28.03.2021 was assessed for the following violations:

- The unit had installed 4 additional CAAQMS and connected to CAC only after 28.2.2021. Only one CAAQMS was under operation, that too in upwind direction.
- Though the unit has installed CEMS to the process/utility stacks such as NPK train, Ammonia prill tower and Boiler (110T/hr) and connected to Care Air Centre, CEMS were not installed for the common stack attached to the boilers (55 T/hr capacity each) and connected to Care Air Centre.


25/11/2021
JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMILNADU POLLUTION CONTROL BOARD,
No.76, MOUNT SALAI, CHENNAI-600 032.

7. It is respectfully submitted that as per the CPCB guidelines, the Environmental Compensation is calculated as follows:

$$(EC) = PI \times N \times R \times S \times LF$$

Where,

PI = Pollution index of industrial sector - 80

N = Number of days of violation took place = 214 (from date of monitoring 26.08.2020 by IIT, Chennai till the prior date of the subsequent AAQ/Stack Emission Monitoring Survey conducted dated 28.03.2021 for the non-compliance of emission norms)

R = A factor in Rupees for EC - 250.

S = Factor for scale of operation -1.5

LF = Location factor - 1.5.

8. It is respectfully submitted that, Show Cause Notice has been issued vide Board's Proc.No.T1/TNPCB/LAW/LAIII/NGT/F.9329/2020/2021 Dated: 21.12.2021 to the Director, M/s. Madras Fertilizers Limited, Chennai as to why Environmental Compensation computed as above should not be imposed against the unit under Section 5 of the Environmental Protection Act, 1986 as per the guidelines issued by the Hon'ble NGT & CPCB for the violations caused by the unit as mentioned therein.

9. It is further respectfully submitted that, the unit has obtained authorization under Hazardous and Other wastes (Management and Transboundary Movement) Rules, 2016 vide Board's Proc. dated 19.11.2021 valid upto 31.03.2026.

Under the above circumstances, it is humbly prayed that this Hon'ble National Green Tribunal may be pleased to pass such further

R. J. J. 25/1/2022
 JOINT CHIEF ENVIRONMENTAL ENGINEER
 TAMILNADU POLLUTION CONTROL BOARD,
 No.76, MOUNT SALAI, CHENNAI-600 032.

or other orders as this Hon'ble Tribunal may deem fit and proper in the facts and circumstance of this case and thus render justice.


25/1/2022
JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMILNADU POLLUTION CONTROL BOARD,
No.76, MOUNT SALAI, CHENNAI-600 032.

BEFORE ME

VERIFICATION

I, R. Rajamanickam, S/o. P.M. Ramasamy, Working as Joint Chief Environmental Engineer, Tamil Nadu Pollution Control Board, Chennai-32, do hereby submit that the contents of the above report are true to the best of my knowledge through records.


25/1/2022
JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMILNADU POLLUTION CONTROL BOARD,
No.76, MOUNT SALAI, CHENNAI-600 032.

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

Original Application No. 70 of 2020
(SZ)

Tribunal on its own motion
SUO MOTU Based on the
News item in the New Indian Express
Newspaper
Chennai Edition Dated 16.05.2020,
"Ammonia leak from Madras
Fertilizers Limited Worries residents in
Chennai's Manali"

-Vs-

1. Union of India,
Rep. by its Secretary,
Ministry of Environment and Forests and
Climate Change, New Delhi and Others.

... Respondents

**REPORT FILED ON BEHALF OF THE
RESPONDENT - TAMIL NADU
POLLUTION CONTROL BOARD**

Advocate for Respondent: TNPCB
Thiru. Sai Sathyajith
BSC, Chennai.

Dated: 25.01.2022

Date of hearing: 27.01.2022

