

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

**ORIGINAL APPLICATION NO. 180 OF 2024 (SZ)**

Tribunal on its own motion-SUO MOTU  
based on the news item published in  
Dinamalar, Chennai Edition dt 20.05.2024 titled  
"A Fire at a Chemical waste dump engulfed  
Villages with toxic fumes"

And

Tamil Nadu Pollution Control Board  
Through its Member Secretary  
Chennai and others

...Respondents

INDEX

<b>S.NO.</b>	<b>DATE</b>	<b>PARTICULARS</b>	<b>PAGE NOS</b>
1.	19.08.2024	Reply filed on behalf of 3rd Respondent	1-5
2.	07.06.2024	Audit Report submitted by M/s. FET Solution	6-37
3.	21.05.2024	Show cause notice issued by TNPCB	38-40
4.	29.05.2024	Reply submitted by the third respondent	41

PLACE:CHENNAI

DATE: 19.08.2024

*T. Hemalatha.*

**ADVOCATE FOR RESPONDENT NO.3**

1

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

**ORIGINAL APPLICATION No. 180 OF 2024 (SZ)**

Tribunal on its own motion-SUO MOTU  
based on the news item published in  
Dinamalar, Chennai Edition dt 20.05.2024 titled  
"A Fire at a Chemical waste dump engulfed  
Villages with toxic fumes"

And

Tamil Nadu Pollution Control Board  
Through its Member Secretary  
Chennai and others

...Respondents

**REPLY FILED ON BEHALF OF THE 3RD RESPONDENT**

The 3rd respondent above named respectfully submits as follows:

1. The above Original Application has been registered SUO MOTU by this Hon'ble National Green Tribunal in pursuance of a new paper report that appeared in Dinamalar dated 20.05.2024 under the caption ரசாயன கழிவு குவியலில் தீ விபத்து , கிராமங்களை சூழ்ந்தது நச்சு புகை. This Hon'ble Tribunal issued notice in the above application on 28.05.2024 taking cognizance of the News paper report.
2. This respondent who has since entered appearance in this matter verified the aforesaid news paper report published by Dinamalar on 20.05.2021. The report proceeds on the basis as though fire emanated from some chemical waste stored at the factory site of this respondent.



3. In the above background this respondent presents the following sequence of events in respect of the aforesaid accident.
- a) A freak fire broke out on Sunday, May 19, 2024, at around 1 pm at the Re Sustainability IWM Solutions Limited facility located in the SIPCOT industrial complex, Gummudipoondi. The fire originated in a scrap yard containing: HDPE liner scrap from a temporary landfill cover, Fiber Reinforced Plastic material, and other scrap materials. The incident did not involve any chemical waste. These materials were kept with an intent to process and to send to cement kilns for co-processing, which is one of the activity for which our Facility is authorized.
- b) As soon as the smoke was identified, the on-site supervisor along with the employees present there had initiated combating the fire, using a fire hydrant system, Aqueous Film-Forming Foam (AFFF), fire water tankers (all readily available within the facility). Immediate assistance was requested from the local fire station, which promptly responded with 2 fire engines.
- c) The team realized that the fire was intensifying due to wind and they used heavy earth-moving machinery to cover the burning materials with soil, effectively cutting off the oxygen supply and mitigating the smoke. With the combined efforts, the fire could be contained in 4 to 5 hours; however could be completely eliminated by around 10.00 p.m.



- d) The incident area has been cordoned off immediately. No adverse health effects on humans or animals were observed, and environmental impacts were mostly limited and localized to the vicinity of the facility. There are no injuries or property damage
- e) The respondent industry has taken this incident very seriously and has taken proactive steps to prevent recurrence of any such incident.
4. From the above narration of facts it is clear that the incident did not involve any chemical waste and that the material involved was purely scrap material intended for further processing for onward disposal to cement kilns. No poisonous emission of gas occurred and the dense black smoke which emanated was only due to short supply of oxygen. There were no injuries to any human being, Animals or other species and there was no health ailment reported as well to any person. No doubt on account of the fire, there was a surge in the levels of PM<sub>10</sub> and NO<sub>x</sub>. However even then its daily average values were not exceeded.
5. At any event in view of their commitment to clean environment, this respondent entrusted an assignment to M/s.FET Solution Private LTD., New Delhi for the purpose of obtaining a fire adequacy report.
6. After a through inspection M/s. FET Solution have submitted an audit report dated 07.06.2024 regarding the fire adequacy present in Re Sustainability IWM Solutions



Limited, SIPCOT, Chennai who is the third respondent herein. **The said audit report is being filed as an Annexure-I along with this reply.** The report makes certain recommendations which the third respondent industry is committed to implementing. It is also important to note that the industry has also taken a Public Liability Insurance policy as early as on 20.08.2023.

7. Independently, the Tamil Nadu Pollution Control Board has also issued a show cause notice dated 21.05.2024 asking the industry to show cause as to why action cannot be taken on account of exceedance of standards prescribed on account of the fire accident at the facility on 19.05.2024. **The Show cause notice is filed as Annexure-II.** In response, the industry by its reply dated 29.05.2024 has clearly submitted that no poisonous gaseous emission has occurred due to the incident and the incident did not involve any chemical waste and therefore requested to drop any further proceedings in this regard. **The reply filed by this respondent is filed as Annexure-III.**

8. It is submitted that high ambient temperature of the day might have resulted in the self-ignition of the scrap material which is inclusive of discarded HDPE liners, Fiber reinforced plastic (FRP) etc.,

9. In these circumstances, it is respectfully submitted that the industry has been functioning with full compliance of fire safety regulations and the fire accident that had occurred on



19.05.2024 was an isolated case not attributable to any negligence on the part of the industry. The industry is committed to maintaining high standards of fire safety and other regulations and undertakes to implement any further recommendations by the Board including the recommendations made by M/s.FET Solution Private LTD., who have submitted a Fire Adequacy Audit Report.

Considering all the above aspects this Hon'ble Tribunal may be pleased to take on file the response of the third respondent and pass suitable orders closing O.A.No.180/2024 and thus render justice.

Dated at Chennai on this the 19th day of August 2024

3rd Respondent



### VERIFICATION

I, Sridhar Reddy Meka S/o. Siva Reddy Meka, General Manager, M/s Re Sustainability IWM Solutions Limited, the 3rd Respondent herein do hereby verify that what are all stated above are true and correct to the best of my knowledge, information and belief.

Verified at Chennai on this the 19th day of August 2024

3rd Respondent

T. Hemalatha



COUNSEL FOR THIRD RESPONDENT



# **FIRE ADEQUACY AUDIT REPORT**

**Re Sustainability IWM Solutions Ltd,  
SIPCOT, Chennai.**

**REV 1  
JUNE 2024**

**FET SOLUTIONS Pvt LTD**

Vasant Kunj, New Delhi

Tel +91 9811340933, Email: [info@fetsolution.com](mailto:info@fetsolution.com)

# 6

## CONTENTS

**COVERING LETTER**

**REPORT APPROVAL FORM**

**ABBREVIATIONS**

**EXECUTIVE SUMMARY**

<b>1</b>	<b>INTRODUCTION</b>	<b>6</b>
1.1	GENERAL	6
1.2	OBJECTIVES	6
1.3	SCOPE OF WORK	7
1.4	METHODOLOGY	7
1.5	AUDIT DESCRIPTION AND TOOL USED	8
<b>2</b>	<b>FIRE AUDIT CHECKLIST</b>	<b>9</b>
<b>3</b>	<b>OBSERVATION AND RECOMMENDATION</b>	<b>17</b>
3.1	FIRE LOAD CALCULATION	25
3.2	RECOMMENDATIONS FROM THE CHCKLIST	30
	<b>APPENDIX A – LEGAL DISCLAIMER</b>	<b>31</b>

7

Our Ref: J1267 Rev1

Date: June 7<sup>th</sup>, 2024

**Re Sustainability IWM Solutions Ltd.  
SIPCOT, Chennai**

Dear Sir,

**SUBJECT: FIRE ADEQUACY AUDIT AND FIRE LOAD CALCULATION**

We are pleased to submit the Audit Report for the above captioned project. If you have any questions or comments, please contact the undersigned. If the report is to your complete satisfaction, please sign and return a copy of the enclosed Report Approval Form.

We thank you for allowing us the opportunity to perform this study and if we can be of any further assistance to you, please contact us.

Yours faithfully,

**FET Solutions P Ltd**



**(Jitendra Kumar)  
Director**

<b>FET Solutions Pvt Ltd</b>		<b>REPORT APPROVAL FORM</b>			<b>Job No.: J1268</b>	
Client:		<b>RE Sustainability IWM Solutions Ltd, SIPCOT, Chennai</b>				
Report Title:		<b>Fire Adequacy Report</b>				
Rev No. 1		<b>SIGNATURE</b>			<b>DATE</b>	
Prepared by:		Sudhanshu Nauriyal			06/06/2024	
Checked by:		Sonali Kumar <i>Sonali</i>			06/06/2024	
Approved by:		Jitendra Kumar <i>Jitendra Kumar</i>			07/06/2024	
Revisions						
Rev.	Revision	By	Checked	Approved	Date	
0	Issued for review and comments	SN	SK	JK	02/06/2024	
Client Approval Of Report:						
Rev	Signature				Date	
1						
<p>This document is confidential and has been produced for the purpose of the above mentioned study and is only suitable for use in connection therewith.</p> <p>Any liability arising out of use of this document by the above mentioned client or third party, for purposes not wholly connected with the above mentioned study, shall be the responsibility of the above mentioned client who shall indemnify FET against all claims, damages and losses arising out of such use.</p>						

## ABBREVIATIONS

AMC	Annual Maintenance Contract
DG	Diesel Generator
EHS	Environment, Health and Safety
ERP	Emergency Response Plan
ESG	Environmental, Social and Governance
FET	Fire, Explosions and Toxics
HAC	Hazardous Area Classification
LPM	Litres Per Minute
MCB	Miniature Circuit Breaker
MCP	Manual Call Point
NBC	National Building Code
P&ID	Piping and Instrumentation
PA	Public Address
PPE	Personnel Protective Equipment
QC	Quality Control
TAC	Tariff Advisory Committee
TREM	Transport Risk & Emergency Management.

## **EXECUTIVE SUMMARY**

RE Sustainability IWM Solutions Limited understand that effective waste management is crucial in preventing environmental degradation and safeguarding human health. Re Sustainability IWM Solutions Limited specializes in sustainably managing solid and hazardous industrial waste generated by a range of industries, including factories, textile mills, mines, and more.

Their waste management solutions are designed to ensure flawless operations, with a focus on efficient segregation, environment-conscious logistics, responsible processing, and eco-friendly disposal of waste. We pride ourselves on our ability to treat and dispose of every type of waste material, regardless of its volume or content, while maintaining uncompromised regulatory compliance.

At Re Sustainability IWM Solutions Limited, their committed to sustainability and environmental preservation. This is why everything they do is guided by our environmental, social, and governance (ESG) policies and practices, which underpin our approach to waste management.

There was a fire incident in May 2024 at the site. This initiated the requirement to check the adequacy of the fire fighting facilities on the site.

FET Solutions Pvt Ltd has been engaged by RE Sustainability IWM Solutions Limited for carrying out Fire Adequacy Report. The present report is the audit report for the Chennai facility based on site visit, documentation review and discussions with site personnel.

## **RECOMMENDATIONS**

- All recommendations can be referred to in section 2 and 3 of this report.

## 1 INTRODUCTION

### 1.1 GENERAL

Re Sustainability IWM Solutions Limited understand that effective waste management is crucial in preventing environmental degradation and safeguarding human health. Re Sustainability IWM Solutions Limited specializes in sustainably managing solid and hazardous industrial waste generated by a range of industries, including factories, textile mills, mines, and more.

Their waste management solutions are designed to ensure flawless operations, with a focus on efficient segregation, environment-conscious logistics, responsible processing, and eco-friendly disposal of waste. We pride ourselves on our ability to treat and dispose of every type of waste material, regardless of its volume or content, while maintaining uncompromised regulatory compliance.

At Re Sustainability IWM Solutions Limited, their committed to sustainability and environmental preservation. This is why everything they do is guided by our environmental, social, and governance (ESG) policies and practices, which underpin our approach to waste management.

FET Solutions Pvt Ltd has been engaged by RE Sustainability IWM Solutions Limited for carrying out Fire Adequacy Report

The present report is the audit report for the Chennai facility based on site visit, documentation review and discussions with site personnel.

### 1.2 OBJECTIVES

FET Solutions team visited the site for assessing the site for relevant observations. There was discussion with plant personnel on design, document and as-built status of the fire safety management systems. It included the review of availability and adequacy of the following:

- Fire and Smoke Detection Systems;
- Alarms and sirens;
- PA system;
- Manual Call Points;
- Fire Fighting Facilities such as sprinklers, extinguishers, etc. including:
- Hydrant locations, conditions of the valve and its components;

# 12

- Condition & operating sequence of fire pumps, the automatic operation of main & jockey pumps;
- Hydraulic test results, reports and maintenance schedule as per IS 2198 for extinguishers;
- Condition and working of the sprinklers, pipes, alarm valves and sprinkler pump and its components;
- Existing Emergency Management Procedures and Fire Drills;
- Sample review of Fire Detection System, Fire Siren and PA system;
- Active and Passive Fire Protection Systems;
- Emergency preparedness based on a fire safety mock drill;

## 1.3 SCOPE OF WORK

The scope of the study is to carry out the Fire load calculations and adequacy audit for facilities.

## 1.4 METHODOLOGY

### **FIRE LOAD CALCULATIONS**

Based on the process and flammable chemicals and their storage capacities, detailed fire load calculations will be carried out, as this will form the basis of fire adequacy check.

### **REVIEW OF ADEQUACY**

Based on the fire load calculations, an adequacy check will be carried out.

### **FIRE CONTROL SYSTEMS AND FIRE FIGHTING FACILITIES**

The Fire Hydrant System, Fire Tenders, Monitors, Foam Flooding Systems and first aid firefighting facilities, their distribution, inspection and maintenance shall be studied.

#### Fire Hydrant System

- Check the hydrant locations, conditions of the valve and its components.
- Check the operating sequence of fire pumps; check the automatic operation of main pump.
- Check condition of the pumps, motor, diesel engine, and the valves in the pump house and if discrepancies found then report the same and get corrected as per the requirement.

# 13

- Check the condition of the control panel.
- Check the location and condition of the fire hoses, hose boxes, and branch nozzles.
- Performance testing of the fire hydrant system with connecting fire hoses at farthest hydrants (two) at a time and the water jet shall be observed.

## **FIRE EXTINGUISHERS**

- Check the condition of the fire extinguishers for the parts operation and condition of the refill.
- Check location, marking of the fire extinguishers
- Check hydraulic test results, reports and maintenance schedule as per IS 2198.

## **SPRINKLER SYSTEM**

- Check the condition of the sprinklers, pipes, alarm valves and sprinkler pump and its components.
- Check working of the sprinklers, fire alarm valves and sprinkler pumps.
- If any discrepancies found then it shall be reported and get rectified.
- Fire/explosion hazards related to the above-mentioned areas shall be identified and how they could materialize in the factory premises shall be determined.
- Review location and flow details as per design, the design documents to be provided by the client.

### **1.5 AUDIT DESCRIPTION AND TOOL USED**

In accordance with the scope of the work, a pre-study data request was sent to Re sustainability IWM Solutions Limited to collect information on the existing systems. Accordingly, the Consultants from FET, New Delhi visited the plant, interacted with the plant engineers from various departments like production, maintenance, HR and with the senior management and had a detailed discussion regarding the management procedures and the safety procedures followed.

The following have been used as guidance for conducting safety audit:

- NBC: National Business Code
- The Factories Act, 1948.
- Good engineering practises followed in similar industries.

## 2 FIRE AUDIT CHECKLIST

### 2.1 FIREFIGHTING REQUIREMENT FOR STORAGE/ PROCESS BUILDING AS PER NBC PART 4, 2016

S.N.	Requirements Under NBC	Remark/ Comments regarding the current status
1.	Fire Extinguishers: (ABC type 5 KG capacity 2. Nos for every 600 sq. meter built up area with minimum 4. Nos per floor.)	As per the site round observations and data provided by RE sustainability IWM Solutions Limited team. The number, capacity and type of the extinguishers provided in different areas are found to be as per the NCB requirements. For details of the placed fire extinguishers refer Annexure A. the total built-up area of the plant is 6676 m <sup>2</sup> , as per the area total number is extinguisher required ABC Powder 5 kg capacity= 22 Nos. and currently site has more than 50 ABC type fire extinguishers. Number, type and capacity of the fire extinguishers are found to be adequate and properly installed.
2.	Hose Reel. (1. No for every 1000 sq. meter built up area)	Installation of hose reel found to be adequate.
3.	Wet Riser (1. No for every 1000 sq. meter built up area).	Not applicable.
4.	Yard Hydrant System	Yes, facility has yard hydrant system.
5.	Automatic Sprinkler System in basement (if basement area exceeds 200 sq. meter)	There are no basements for these building.

# 15

S.N.	Requirements Under NBC	Remark/ Comments regarding the current status
6.	Automatic Detection and Alarm System.	Not complied. Presently
7.	Underground Sump of 75,000 Liter.	Currently plant is having Fire water tank of capacity 200 KI which is more than the required capacity as per NBC. Hence as per NBC requirements existing fire water tank is having adequate capacity.
8.	Fire Pump: One Electrical and One Diesel pump of 1620 LPM and One Jockey Pump of 180 LPM at Ground level	Currently Plant is having fire water electrical and diesel pump of 171m <sup>3</sup> /hr (2850 LPM) discharge flowrates, hence these NBC requirements is met at plant. But existing jockey pump id having 10.8 m <sup>3</sup> /hr (180 LPM) discharge flowrate which is meet NBC requirement.
9.	Location of Transformer to be indicated in plan and fire protection to be provided	Location of Transformer is adequately indicated in plan and required fire protection is provided.
10.	MCB Circuit breakers and Electrical Safety	Adequate measures are taken for MCB Circuit breakers and electrical safety.
11.	Emergency Lighting with 2 Hours Battery Backup & Auto Glow Exit Signs.	Admin / Lab / Security / incinerator building had emergency lightning with 4 hour back up. Additionally, DG Backup is provided.
12.	The staff shall be trained in evacuation/ handling Fire Equipment.	Plant has identified the numbers of fire fighters in each plant sections and regular training are conducted for the firefighting teams. And as per the site visit interviews of some of the trained fire fighter it is found that fire fighters

S.N.	Requirements Under NBC	Remark/ Comments regarding the current status
		are adequately trained to handle fire equipment's and are aware about the action to be taken in case of fire scenarios. 20 fire fighters, min 5 firefighters in each shift and latest training date – 3/05/2024

**2.2 REQUIREMENT OF PORTABLE FIRE EXTINGUISHERS**

**As per the Factories Act 1948 and Tamil Nadu Factories Rules 1950: -**

- 1 no. 9 liter water/ sand bucket shall be provided / 100 M2 floor area.
- 1 no. 9 liter Water type Fire Extinguisher shall be provided to 6 water/ sand buckets Or
- 1 no. 9 liter Water type Fire Extinguisher shall be provided for every 600 m2 of floor area (in addition to the buckets)
- This equipment shall be so distributed over the entire floor areas that a person shall have to travel not more than 25 metres from any point to reach the nearest equipment.

**Calculation for fire extinguisher requirement**

- Floor Area in 100M2 = 1 No. of 9 liter Water or sand Fire Buckets.
- Floor Area in 600 M2 = 1 No. of 9 liter Water Fire Extinguishers.

**NOTE:** 1 No. of 9 Liter Water Fire Extinguishers = 1 no.4.5 Kg DCP Fire Extinguisher = 2 no. 4.5 Kg CO2 Fire Extinguishers.

Above requirement of Factories act and Tamil Nadu Factories Rules 1950 is reviewed in the NBC 2016 requirements and all Units in RE sustainability IWM Solutions Limited are meeting these requirements.

### 2.3 REQUIREMENT OF FIRE HYDRANT SYSTEM

S.N.	Requirement	Remark/ Status
1.	A trained pump man shall be available on all shifts and at all hours of the day and night to operate the pump as and when required.	Compliance, Trained pump man is available all shifts.
2.	Water shall always be available immediately to all hydrant / fixed monitors with all cut-off valves being kept open.	Compliance
3.	Connection for any purpose other than firefighting are not permitted from the hydrant / fixed monitor stand post or from any portion of the hydrant services.	Compliance
4.	Except where impracticable, all hydrant outlets shall be situated 1m above ground level.	Compliance, all hydrant outlets are above ground 1 m level.
5.	The stand posts shall be 80 mm in diameter for single headed hydrants, 100 mm for double headed hydrants, monitor of 63 mm to 75 mm size and 150 mm for monitor of 100 mm size. It is recommended that stand posts be painted 'fire red' (shade no. 536 as per IS-5) and numbered for easy identification.	Compliance, Sizing of stand post, hydrant points, monitor are adequate as per the requirements.
6.	Orifice plates of suitable design shall be provided for fire hydrants where the running pressure exceeds 7 kg per cm square.	Compliance
7.	Hydrant shall be easily accessible, storage of any kind on or around the hydrant being prohibited. Where hydrants are situated in remote locations, they shall be approachable by means of paved pathways.	Not Compliance, all hydrant points are not easily accessible and are not free from obstructions. This to be ensured that accessibility of the hydrant point shall be obstruction free
8.	Hydrant heads shall be positioned at distances not less than 2 m from the face of the building or age of the storage plot to be protected.	Compliance, As per the site visit observations all fire hydrant

## 2.4 MEANS OF ESCAPE IN CASE OF FIRE

S. N.	Requirement	Remark/ Status
1.	The responsible person must ensure that there is adequate means of escape in case of fire.	Compliance
2.	Regular checks should be made to ensure that escape routes including exits, corridors and stairways are kept free from obstruction.	Compliance
3.	Checks should also be made to ensure that doors used as fire exits are readily available for use and can be opened in the event of an emergency without the use of keys.	Compliance
4.	Fire-resisting, self-closing doors should not be wedged or be held open except by approved devices designed to release the doors on the automatic actuation of the fire alarm system.	Not available
5.	Fire resisting construction should be checked regularly to ensure that the integrity of the structures is intact.	Not available

## 2.5 EMERGENCY EXIT – ESCAPE DOOR REQUIREMENTS

### Under the section 38 of the Factories Act 1948

S. N.	Requirement	Remark/ Status
1.	No exit intended for use in case of fire shall be less than 100 cms in width nor less than 2 m in height	Compliance, all exits are adequately sized.

# 19

S. N.	Requirement	Remark/ Status
2.	In case where 20 or more worker work at a time above the level of ground floor at least 2 separate and substantial stairways permanently constructed either inside or outside the building and which afford direct and unimpeded access to the ground level.	Compliance
3.	No fire escape stairway shall be constructed at an angle greater than 45° from the horizontal and shall not be less than 100 cms in width.	<p>1. Compliance, fire escape stairway are adequately sizes are not greater than 45 deg angle and width is also greater than 100 cms. (applicable in incinerator area)</p> <p>2. However, there is no fire escape provided for admin block for QC lab. A separate fire escape or an alternate emergency exit to be provided for the lab area.</p>
4.	The fire escape shall be within 30 m, along the line of travel from any part of the floor from which it is meant to provide escape.	Compliance, (applicable only for incinerator area)
5.	The fire escape shall be so positioned that each person will have a reasonably free and unobstructed passage from his workplace to the exit.	Compliance (applicable only for incinerator area)

## 2.6 FIRE ALARM SYSTEM

S. N.	Requirement	Remark/ Status
1.	The responsible person must ensure that there is adequate means for detecting fire and sounding the alarm and that the equipment is inspected and tested.	Partially Complainant, beam detectors are provided only in incinerator storage shed.

S. N.	Requirement	Remark/ Status
2.	The fire alarm system should be tested weekly for function and to check whether the sounders can be heard throughout the building.	Compliance
3.	The fire alarm system should be inspected and tested quarterly and annually by a competent person.	Compliance (as part of AMC)

## 2.7 FIRE EQUIPMENT & PROTECTION

S. N.	Requirement	Remark/ Status
1.	The responsible person must ensure that there is adequate means for fighting fire.	Compliance, Dedicated team is responsible for ensuring same.
2.	Daily checks should be made to ensure that fire-fighting equipment is in place, have not been discharged, are at the correct pressure and have not suffered any obvious damage	Compliance
3.	A competent person should carry out an annual service	Compliance, Competent third party is appointed.
4.	An extended service should be carried out every 5 years on portable fire extinguishers	Compliance, Competent third party is appointed to maintain all fire extinguishers.
5.	Portable fire extinguishers should be subjected to a major overhaul or be replaced every 20 years.	Compliance, Competent third party is appointed to maintain all fire extinguishers, regular checks, refilling and replacements is done at defined schedule.

## 2.8 FIRE SAFETY SIGN

S. N.	Requirement	Remark/ Status
1.	The responsible person must ensure that emergency routes are adequately marked and that the signs comply with the Health and Safety (Safety Signs and Signals) Regulations 1996. (UK). Regular checks should be made to ensure that fire safety notices are legible and undamaged.	Compliance, Dedicated team is responsible for ensuring all the requirements and regular checks inside the plants.

## 2.9 FIRE TRAINING

S. N.	Requirement	Remark/ Status
1.	The responsible person must ensure that members of staff are trained on the action to be taken in the event of fire, some members of staff are given adequate training on how to use fire-fighting equipment and there is adequate means of liaison with the Fire Brigade.	Compliance, Safety team is responsible for ensuring all the requirements of the trainings. All units have their firefighting team identified and regular trainings of the same are been done by safety department to ensure their ability to handle fire scenarios.

## 3 OBSERVATION AND RECOMMENDATION

S. N.	Observations	Recommendations/ Comment	Prioritization	Reference standard
<b>For All Plant Areas</b>				
1.	Basic safety briefing is not provided at the entry gate for the Assessment team. However, there is system provided for the detailed safety induction which include critical safety aspects for Contract employees.	<p>The facility shall ensure that the all visitors are briefed about safety instruction in the form a video, presentation or verbal instruction at least with the following content: -</p> <ul style="list-style-type: none"> <li>• accessible areas,</li> <li>• emergency response,</li> <li>• escape routes,</li> <li>• key contacts in case of emergency,</li> <li>• mandatory personal protective equipment,</li> <li>• assembly points,</li> <li>• List of hazardous areas.</li> <li>• Alarms and their significance</li> </ul>	Major	Factory Act- 1948
2.	<p>During the audit emergency exit plans were reviewed and following gaps were identified.</p> <p>Emergency exit plan for the facility: Directional arrows which shows the route towards the emergency exit were not shown</p>	It is suggested to prepare two separate layouts one as emergency exit plan showing exit discharges with clearly marked directional arrows that leads directly outside or to a street, walkway, refuge area, public	Major	Factory act - 1948 and IS- 2190

S. N.	Observations	Recommendations/ Comment	Prioritization	Reference standard
	on the layout for each location.	way, or open space with access to the outside. And the other layout as firefighting layouts indicating location of fire extinguishers installed in the area along with their type, location of MCPs, first aid kits, alarm panels etc. Both the layouts to be prepared and placed at all plant/building entries and prominent locations.		
3.	Emergency Response Team contact detail were displayed	Good Practice	-	Good Engineering Practice
4.	Records related to inspection and maintenance of fire extinguishers were reviewed and found to be well maintained	Good Practice.	-	IS-2190, 8.1 to 9 and 10.
5.	During the site visit, sand buckets were examined at few places and were found to be adequately maintained.	The facility to ensure that all sand buckets are maintained as per IS – 2546.	Minor	IS-2546
6.	Records related to inspection and maintenance of smoke detectors/fire detectors and alarm system were requested. <ul style="list-style-type: none"> <li>• The smoke, heat, gas detectors are installed in the facility.</li> <li>• The testing parameter were not available with the</li> </ul>	It is recommended to provide smoke detectors with alarm in the facility. The facility to obtain inspection and testing procedures followed by vendor. Same to be reviewed for conformity to IS 2189/IS 2175. Alternatively,	Major	IS-2189, IS-2175

S. N.	Observations	Recommendations/ Comment	Prioritization	Reference standard
	department.	certificates stating adherence to prescribed standards can be obtained from vendor. Also, smoke detector random performance test shall be carried out.		
7.	Assembly point signage were found to be inadequately sized and less legible from a fair distance	Assembly point signage should be made and displayed in accordance with IS 9457.	Major	IS - 9457
8.	Some of the fire hydrant points was found inapproachable due to either vegetation growth around them or by material stored in front of it or scrap material stored in front of it, which will affect the firefighting efficiency in the time of emergency.	Hydrant point shall have clear visibility and shall be free from any obstruction. Also, accessibility for all hydrant points to be reviewed.	Critical	TAC/IS/NBC / IS 13039
9.	Some of the hydrant points were checked during the site round for the presence of the internal rubber gasket and other physical inspection (like position, height, tagging etc.). All points found to be adequately maintained. All hose boxes are also adequately maintained.	Good engineering practice	-	-
10.	Minimum 20 percent excess stock of portable fire extinguishers are maintained at facility as per the requirements.	Good engineering practice.	-	-
11.	Sprinkler system has been provided in Incinerator Store / AFRF Store in the plant but for some areas the requirement	As per National Building Code, it is necessary to provide automatic sprinkler system in hazardous and	Medium	National Building Code

## 25

S. N.	Observations	Recommendations/ Comment	Prioritization	Reference standard
	of sprinkler system has not been assessed.	industrial (hazardous) buildings. Care shall be exercised while providing appropriate sprinkler system. For e.g., water sprinkler systems should not be provided to areas where water reactive chemicals may be handled.		Part 4 Table 23
12.	The pressure gauge was not installed in hydrant line.	It is recommended to install pressure gauge in the hydrant line for efficient pressure monitoring	Minor	IS 2190/IS-3844/IS-13039.
13.	Cable runs (galleries/ trenches/ tunnels) have not been provided with fire detection and alarm system anywhere in the entire facility.	The entire cable run shall be protected by automatic fire detection and alarm system. All cable runs should be compartmented after a fair distance (preferably 30m). The service areas shall be provided with appropriate illumination levels / emergency light / Firefighting facilities.	Major	IS 12459
14.	Fire escape route plans have been missing at most locations.	These are to be prepared and displayed at prominent places with clear view & direction signage to be corrected.	Major	Factory act, NBC-2005
15.	Appropriate Emergency exits are missing for Admin Area and lab at the first floor area	Ensure separate emergency exits provided for the mentioned area.	Major	National Building Code

S. N.	Observations	Recommendations/ Comment	Prioritization	Reference standard
16.	K type fire extinguisher cannot be verified during site round in kitchen or canteen area.	K type extinguishers (Clean Agent Fire Extinguisher) shall be provided for canteen kitchen area.	Major	IS15683
<b>Fire Pump Station</b>				
17.	Instruction board was not displayed in this room.	The instruction board should be displayed as per TAC standards.	Major	TAC / Good engineering Practice
18.	Direct electricity supply was provided to main pump.	Direct electricity supply shall be ensured from the substation. It is very important that the fire pump is powered continuously, and inadvertent power disconnection is averted. It is preferable that it connects directly to the power supply.	-	TAC
19.	The main pump & jockey pump diagram was not displayed in the pump house.	The main pump and jockey pump diagram shall be displayed in the pump house with details of their capacity, discharge pressure, size etc.	Minor	TAC
20.	Diesel Pump was found to be out of service during the site round.	Diesel fire pumps are used as a backup when the power supply in a facility is unreliable, has insufficient capacity, or in case of a power outage (which is extremely common in bushfire-affected areas). They have an independent power supply system, the battery, which allows the pumps to operate even when	Medium	IS 15301

S. N.	Observations	Recommendations/ Comment	Prioritization	Reference standard
		disconnected from the primary power supply. It is recommended to put diesel pump with independent power supply.		
21.	Fire water reservoir level indication is provided in the pump house.	Good Practice	-	IS 9668 / TAC
22.	Log book & History book of pump maintenance is maintained	-	-	TAC
<b>Cylinder Shed</b>				
23.	Helium, Oxygen and acetylene cylinder stored inside the shed side by side.	It is recommended to have a dedicated acetylene storage shed in the facility or it shall be kept at a safe distance from the oxidizer or isolated from the oxidizer which is oxygen in this case.	Major	Good Engineering Practice
<b>All Storage Shed</b>				
24.	No MCP is observed at the entrance or for admin and QC building	MCP is to be free from any obstruction. Recommended locations of Manual call points are near or within emergency escape routes with wall mounting at a height of 1.4 m and signage above them.	Major	Factory Act/NBC Part 4/ IS 2189
<b>Reception and Office Area</b>				

S. N.	Observations	Recommendations/ Comment	Prioritization	Reference standard
25.	Layout indicating the location of FE, Smoke /Heat Detector, MCP diagram, FE, assembly point etc. has not been displayed for the area.	Layout indicating location of fire extinguishers installed in the area along with their type, location of MCPs, first aid kits, alarm panels etc. to be prepared and placed for the area	Minor	IS 2189, IS 2190, NBC factory act. / ERP
26.	Three doors are provided in the admin block. However, they all are present at one side of the wall.	Alternative emergency exit shall be provided for admin block area first floor / ground floor and preferably in diagonally opposite direction.	Major	NBC Factory Act, IS 1644/ IS1641/IS 1642
27.	Overall good tagging and identification system for all firefighting system were observed through all plants during the plant visits.	Good engineering practice	-	-
28.	As per the site observation, suitable type fire extinguishers were observed in all plant areas as per 29 CFR 1910.157(d)(4) & NFPA 10. <b>Note:</b> <u>Adequacy of the existing Fire extinguishers (required number and type) will be further studied during the fire load calculation stage of the assessment and comment regarding the area specific requirement will be mentioned in the fire load calculation report.</u>	Refer to Fire Load calculations	-	-

S. N.	Observations	Recommendations/ Comment	Prioritization	Reference standard
29.	Plant has adequate schedule for conducting mock drills for different emergency scenarios.	Good engineering practice	-	-
30.	Smoke detection is not provided in the admin block as well.	Smoke detection and alarm to be provided in the admin building.	Major	Good Engineering Practice.
31.	No dedicated temporary waste store.	<p>Presently site is spread in a large area. Sometimes temporary waste might be stored in a vacant land without any fire fighting protection, this could lead to a hazardous situation.</p> <p>It is recommended to that a whenever such activity is carried out. Appropriate measure shall be taken for fire protection or adequate fire fighting facility shall be provided around it which can reduce the escalation of Hazard or its severity.</p>	Major	Good engineering practice.

## 3.1 FIRE LOAD CALCULATION

Location/ Plant Name	Specific Area Name	Area (Sq m)	Name of the material in the area	Quantity	Calorific Value in Kcal/kg	Fire Load (Kcal/m <sup>2</sup> )	Hazard Category	Fire Rating	Minimum No of extinguisher required	Existing Availability	Gap / Recommen dation
Re Sustainabil ity IWM Solutions Limited	Security Room	11.97	PC, Chairs, Tables, Documents, electricals	100.00	4500.00	37588.96	Low Fire Load	1.00	1.00	1	Complied
Re Sustainabil ity IWM Solutions Limited	Weighing Bridge Room	13.57	PC, Chairs, Tables, Documents, electricals	100.00	4500.00	33171.41	Low Fire Load	1.00	1.00	2	Complied
Re Sustainabil ity IWM Solutions Limited	Sample collection Platform	7.48	Waste Material	10000.00	8000.00	10695187.1 7	High Fire Load	1.00	1.00	2	Complied
Re Sustainabil ity IWM Solutions Limited	General Stores	222.95	PPEs , Safety Shoes	80.00	8600.00	688000.00	High Fire Load	15.00	2.00	1	Add another ABC type Fire extinguisher
Re Sustainabil ity IWM Solutions Limited	Temporary Waste Stores	441.71	Waste Material	1317000. 00	2500.00	7453936.71	High Fire Load	29.00	3.00	5	Complied

Location/ Plant Name	Specific Area Name	Area (Sq m)	Name of the material in the area	Quantity	Calorific Value in Kcal/kg	Fire Load (Kcal/m <sup>2</sup> )	Hazard Category	Fire Rating	Minimum No of extinguisher required	Existing Availability	Gap / Recommen dation
Re Sustainabil ity IWM Solutions Limited	Waste Stabilisatio n Unit	247.41	Waste Material	985000.0 0	2500.00	9952997.60	High Fire Load	17.00	2.00	5	Complied
Re Sustainabil ity IWM Solutions Limited	Interactabl e waste stores -2	441.71	Waste Material	2247000. 00	8000.00	40696117.3 2	High Fire Load	29.00	3.00	9	Complied
Re Sustainabil ity IWM Solutions Limited	Vehicle Maintenan ce Store	104.65	LPG	14.00	11800.00	1578.55	Low Fire Load	7.00	1.00	1	Complied
Re Sustainabil ity IWM Solutions Limited	Vehicle Parking	206.95	14 vehicles at a time	630.00	11110.00	33820.74	Low Fire Load	14.00	14.00	25	Complied
Re Sustainabil ity IWM Solutions Limited	DG and Electrical Panel Room	63.73	Cables	300.00	10000.00	47071.45	Low Fire Load	5.00	1.00	1 each	Complied

Location/ Plant Name	Specific Area Name	Area (Sq m)	Name of the material in the area	Quantity	Calorific Value in Kcal/kg	Fire Load (Kcal/m <sup>2</sup> )	Hazard Category	Fire Rating	Minimum No of extinguisher required	Existing Availability	Gap / Recommen dation
Re Sustainabil ity IWM Solutions Limited	Proposed Blending and AFRF Shed	650.00	Waste Material	1728000. 00	8000.00	21267692.3 1	High Fire Load	43.00	4.00	7	Complied
Re Sustainabil ity IWM Solutions Limited	OHS and Drivers Rest Room	36.00	PC, Chairs, Tables, Documents, electricals	100.00	4500.00	12500.00	Low Fire Load	3.00	1.00	1	Complied
Re Sustainabil ity IWM Solutions Limited	Incinerable Waste Store -2	1000.0 0	Waste Material	1193000	8000.00	9544000	High Fire Load	65.00	5.00	9	Complied
Re Sustainabil ity IWM Solutions	Incineratio n Unit	1825.0 0	Waste Material	12000.00	8000.00	52602.74	Low Fire Load	119.00	10.00	None	Fire Extinguishe r to be provide
Re Sustainabil ity IWM Solutions Limited	Proposed Fire Hydrant Pump House	77.00	Diesel	150.00	7000.00	13636.36	Low Fire Load	6.00	1.00	2	Complied

Location/ Plant Name	Specific Area Name	Area (Sq m)	Name of the material in the area	Quantity	Calorific Value in Kcal/kg	Fire Load (Kcal/m <sup>2</sup> )	Hazard Category	Fire Rating	Minimum No of extinguisher required	Existing Availability	Gap / Recommen dation
Re Sustainabil ity IWM Solutions Limited	MCC/PCC Room	150.00	Panels / Cables /	300.00	10000.00	20000.00	Low Fire Load	10.00	1.00	1	Complied
Re Sustainabil ity IWM Solutions Limited	Stroage tank farm Area	110.00	FO/ Diesel	21000.00	11110.00	2121000.00	High Fire Load	8.00	1.00	1	Complied
Re Sustainabil ity IWM Solutions Limited	Admin	160.35	Tables / Chairs	3400.00	4500.00	95416.28	Low Fire Load	11.00	1.00	2	Complied
Re Sustainabil ity IWM Solutions Limited	Lab	160.35	Tables / Chairs / Chemicals	200.00	10000.00	12472.72	Low Fire Load	26.00	2.00	2 ABC 4 BC type extinguisher	Complied
Re Sustainabil ity IWM Solutions Limited	Disel Shed	144.00	Diesel	900.00	11110.00	69437.50	Low Fire Load	10.00	1.00	2.0	Complied
Re Sustainabil	Lubricant Shed	144.00	Lubricant	800.00	8000.00	44444.44	Low Fire Load	10.00	1.00	-	Provide at least 1 FE



## 3.2 RECOMMENDATIONS FROM THE CHECKLIST

The following recommendations are listed from the checklist:

1. The updated Safety Policy to be on display at prominent locations.
2. Provide training to Safety committee members and down the level training to all the concerned employees on latest developments in EHS.
3. Near miss reporting and root cause analysis is to be improved upon as there were cases which are not reported and the causal factors are reported as root causes.
4. The Management of Change procedure is in place, however, hazard identification needs to improve and then the same to percolate in trainings.
5. Secondary containment is to be ensured for all storages, and drip trays at relevant locations.
6. Implementation of use of PPEs need to improve.
7. Hazardous Area Classification (HAC) study was done, however, the same needs to be updated as per changes made since then.
8. Contractor workers are provided training on safety, however, implementation needs to improve.
9. Maintenance of flameproof fittings need improvement.
10. Management of Change procedure in place, however, implementation is not adequate.
11. Width of the access need to be minimum 1.2 m at all places for emergency scenarios.
12. Following safe procedures for storage of materials, the implementation needs to be improved.
13. The checklist for truck drivers does require TREM cards, though implementation is not proper.

## APPENDIX A – LEGAL DISCLAIMER

a. Limitation of Liability. The consulting services conducted by FET Solutions (Pvt.) Ltd. (the “Company”) were performed using generally accepted guidelines, standards, and/or practices, which the Company considers reliable. Although the Company performed its consulting services pursuant to reliable and generally accepted practices in the industry, the Company does not guarantee or provide any representations or warranties with respect to Client’s use, interpretation or application of the findings, conclusions, and/or suggestions of the consulting services provided by the Company. Moreover, the findings, conclusions, and the suggestions resulting from the consulting service are based upon certain assumptions, information, documents, and procedures provided by the Customer. AS SUCH, IN NO EVENT AND UNDER NO CIRCUMSTANCE SHALL THE COMPANY BE LIABLE FOR SPECIAL, INDIRECT, PUNITIVE OR CONSEQUENTIAL DAMAGES OF ANY NATURE WHATSOEVER, INCLUDING WITHOUT LIMITATION, ANY LOST REVENUE OR PROFITS OF THE CUSTOMER OR ITS CUSTOMERS, AGENTS AND DISTRIBUTORS, RESULTING FROM, ARISING OUT OF OR IN CONNECTION WITH, THE SERVICES PROVIDED BY THE COMPANY. The Customer agrees that the Company shall have no liability for damages, which may result from Client’s use, interpretation or application of the consulting services provided by the Company.

b. The Company’s pricing of the consulting services provided does not contemplate that the Company shall have any liability resulting from its performance of the consulting services, except as otherwise set forth in the Quotation from the Company. Accordingly, the Customer shall indemnify and hold harmless the Company, its shareholders, directors, officers, employees and agents (the “Indemnified Parties”) from and against any and all loss, cost, liability and expense, including reasonable attorney’s fees and costs, which any of the Indemnified Parties may incur, sustain or be subject to, as a result of any claim, demand, action, investigation or proceeding arising out of or relating to either: (a) the consulting services provided by the Company; or (b) any material, equipment, specifications or safety information (or lack thereof) supplied to the Company (or which should have been supplied to the Company) by Customer and/or any failure of such materials, equipment, specifications and safety information to comply with any federal, state or local law or safety standard.

c. For additional terms and conditions, which apply with respect to the provision of this report, see the Quotation provided by the Company and executed by Customer. If any terms set forth in the Quotation conflict with the terms set forth herein, the terms set forth herein shall apply.

By R.P.A.D



**TAMILNADU POLLUTION CONTROL BOARD**

Plastic Pollution Free  
Tamil Nadu

O/o. The District Environmental Engineer,  
Tamil Nadu Pollution Control Board,  
Plot No.:88A, SIPCOT Industrial Complex,  
Gummidipoondi-601201.

**Proc. No.: DEE/ GMP/ F.0088GMP/RL/A/2024 dated:21.05.2024**

Sub: TNPC Board - Industries –M/s. RE Sustainability IWM Solutions Limited, Plot Nos.: 1 to 33 and 124 to 150, SIPCOT industrial Complex, Gummidipoondi, Gummidipoondi Taluk, Tiruvallur District –Fire accident occurred on 19.05.2024 resulted in air pollution-violation of provisions of the Air (P&CP) Act,1981, as amended – Show Cause Notice-issued.

- Ref: 1. Proc. No.T2/TNPCB/F.0086GMP/RL/GMP/A/2022 dt: 14/12/2022.  
2. Fire accident occurred in the premises of the facility on 19.05.2024.  
3. Inspection of the facility by the officials of TNPCB on 19.05.2024.  
4. Ambient Air Quality Data recorded in the CAAQMS maintained by the Facility.

\*\*\*\*\*

Tamil Nadu Pollution Control Board serves this notice to you as occupier of the unit of M/s. RE Sustainability IWM Solutions Limited, Plot Nos.: 1 to 33 and 124 to 150, SIPCOT industrial Complex, Gummidipoondi, Gummidipoondi Taluk , Tiruvallur District for contravening the provision under Section 22 of the Air (Prevention & Control of Pollution) Act 1981 as amended.

Whereas Consent to Operate was issued vide proceedings 1<sup>st</sup> cited to the unit for the period valid up to 31/03/2027 for the Secured Landfill (SLF) & Landfill After Treatment (LAT) Waste of 3,00,000 TPA, Alternate Fuel and Raw Material Facility (AFRF) of 50,000 TPA and Common Incinerator for Hazardous Wastes and Biomedical Waste of 1.5 TPH Capacity subject to certain conditions and the provisions of the Air (Prevention and Control of Pollution) Act,1981, as amended.

Whereas Section 22 of the Air (Prevention and Control of Pollution) Act,1981, as amended, stipulates that "No person operating any industrial plant, in any air pollution control area shall discharge or cause or permit to be discharged

the emission of any air pollutant in excess of the standards laid down by the State Board under clause (g) of sub-section (1) of section 17".

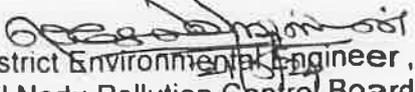
Whereas on 19.05.2024, because of the fire accident occurred within the premises, at around 1.00 p.m., which lasts, till 10.30 p.m., results in the emanation of the dense smoke spreading to the nearby areas, causing pollution to the areas, which was evident from the surge in the values of NO<sub>x</sub> and PM<sub>10</sub> recorded in the Continuous Ambient Air Quality Monitoring Station maintained by the Facility during the occurrence of fire, which indicates that ambient air quality in the vicinity of the Facility (Hourly average values) exceeded the standards prescribed (daily average) during occurrence of fire. Further, the longer time taken for the put off of the fire, since 2.00 p.m. to 8.30 p.m. and completely stopping the smoke emanation only by 10.30 p.m., indicated that the Facility is not fully prepared to handle such eventuality.

Thus, in view of the incidence occurred at the Facility on 19.05.2024, thereby resulting in exceedance of the standards prescribed, as shown above, is violation of the provisions of Section 22 of the Air (prevention and Control of Pollution) Act, 1981, as amended. And as such the provisions of Section 22 of the Act have been contravened by you which is an offence punishable under section 37 of the Act with penalty which shall not be less than ten thousand rupees, but which may extend to fifteen lakh rupees. Further, the State pollution Control Board (Tamil Nadu Pollution Control Board) , in exercise of its powers conferred under Section 31A of the Act, is empowered to issue directions for the closure of the facility, Stoppage of Power Supply to the Facility, or for the issue of any other direction with a view to ensure such as occurrence of exceedance of air quality standard shall not occur.

Hence, you are directed to show cause within 10 (Ten) days from the date of receipt of this notice as to why penal action for the above offences punishable under Section 37 of the Air (Prevention and Control of Pollution) Act, 1981, as amended Act should not be initiated against your Facility and as to why directions for the (i) Closure of the facility and Disconnection of Power Supply to the facility shall not be ordered or (ii) as to why directions for the suspension of operation of the facility, until such time, the facility evolve an action plan to avert such incidence in consultation with the experts in that field and to implement those measures to

contain such incidence, at the least **40** able time, so that such events could be averted and thereby the consequential air pollution is avoided.

It is informed that non receipt of any reply within the prescribed period will be construed that you have no satisfactory explanation to offer for the above said contravention and action will be taken on merits in accordance with law.

  
District Environmental Engineer,  
Tamil Nadu Pollution Control Board  
Gummidipoondi

To

1. M/s.RE Sustainability IWM Solutions Limited,  
Plot No : 1, SIPCOT industrial Complex,  
Gummidipoondi - 601201.
2. Thiru S K Sanjiv Kumar,  
The Vice President, M/s.RE Sustainability IWM Solutions Limited,  
11B/ Auro Galaxy Knowledge City Centre,  
Gachibowli, Hyderabad – 500081.

To,

Date: 29<sup>th</sup> May 2024

The District Environmental Engineer,  
Tamil Nadu Pollution Control Board,  
Plot No. 88A, SIPCOT Industrial Complex,  
Gummidipoondi – 601201.

**Subject: Response to the letter bearing Proc. No. DEE/GMP/F.0088GMP/RL/A/2024 dated 21.05.2024.**

**References:**

1. Proc. No. DEE/GMP/F.0088GMP/RL/A/2024 dated 21.05.2024.

Dear Sir,

We, **Re Sustainability IWM Solutions Limited**, located in the SIPCOT industrial complex, Gummidipoondi acknowledge the receipt of your letter dated 21.05.2024 and submit as below:

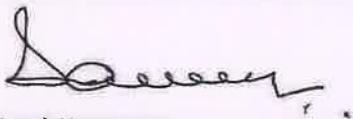
1. That, on Sunday, May 19, 2024, at approximately 1:00 PM, a fire broke out in a scrap yard within our facility. The scrap yard contained high-density polyethylene (HDPE) liner scrap (unused cut pieces left over from temporary landfill cover material), fiber-reinforced plastic material, and other non-chemical scrap materials. These materials were intended for processing and co-processing at cement kilns, in line with the activities authorized for our facility.
2. That, upon identifying smoke, our on-site supervisor and employees present there immediately initiated fire-combatting measures using our readily available fire hydrant system, Aqueous Film-Forming Foam (AFFF), and fire water tankers. We also requested immediate assistance from the local fire station, which responded promptly with two fire engines.
3. That, despite the initial efforts, the fire intensified due to the prevailing wind conditions. Our team utilized heavy earth-moving machinery to cover the burning materials with soil, effectively cutting off the oxygen supply and mitigating the smoke. With these efforts, the fire was contained within 4 to 5 hours and completely extinguished including smoke by around 10:00 PM the same day.
4. That we cordoned off the incident area immediately. There were no adverse health effects on humans or animals, and the environmental impacts were limited and localized to the immediate proximity. No injuries or property damage occurred as a result of the fire.

5. That, the incidence did not involve any chemical waste. The materials involved in the incident are scrap materials, intended for further processing to be disposed of in cement kilns for co-processing.
6. That, no poisonous gaseous emission has occurred due to the incidence; but dense black smoke was noticed.
7. That, Re Sustainability IWM Solutions Limited takes this incident very seriously and is committed to taking proactive steps to prevent any such recurrence. We have entrusted the fire safety adequacy assessment assignment to M/s. FET (Fire, Explosion, and Toxics) Solutions Pvt Ltd which is a premier, Global Safety Consulting and Training firm that specializes in Organizational, Process, and Behaviour Safety working in Hazard Identification, Risk Assessment, Risk Management, and Safety Culture transformation. We are expecting their findings and recommendation by 01/06/24 and we will do the needful on a priority basis.
8. We state that for the ongoing management of industrial wastes, it is crucial to resume operations.
9. We believe that our prompt action as enumerated above and transparency in reporting the incident reflects our commitment to environmental responsibility and safety.
10. In light of the aforementioned circumstances and our immediate response to mitigate the incident, we would request you to close the notice as referred above and not proceed with the provisions of the Air (Prevention and Control of Pollution) Act, 1981 and other action as mentioned in your above-referred notice and oblige.

We appreciate your understanding and support as we work through the learnings from this incident and implement any necessary improvements. Please let us know if any further information required.

Sincerely,

For Re Sustainability IWM Solutions Limited

A handwritten signature in black ink, appearing to be 'D. S. S.', written over a horizontal line.

Authorized Signatory

15/06

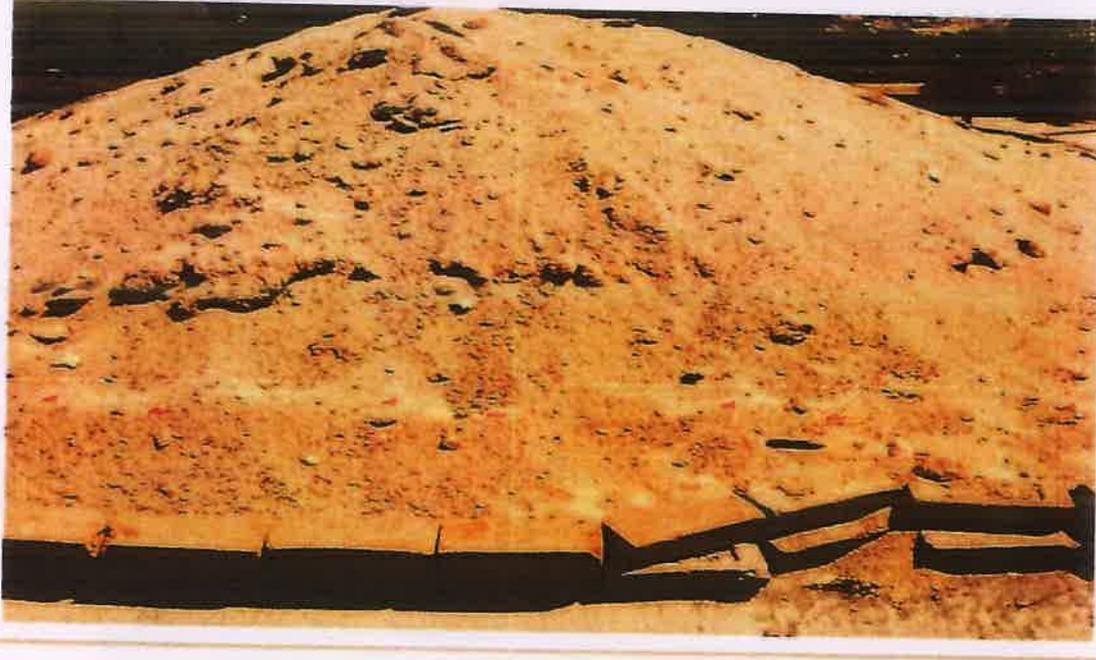
To,  
The District Environmental Engineer,  
Tamil Nadu Pollution Control Board,  
Plot No. 88A, SIPCOT Industrial Complex,  
Gummudipoondi – 601201.

Date: 7<sup>th</sup> June 2024

Dear Sir,

This is to bring to your notice that referring to the fire incident on 19/05/2024 at our plant, please find below various activities taken based on your recommendations.

1. Comprehensive safety audit has been conducted at our facility and the report is attached here with for your perusal.
2. Sand and Soil Storage in Vulnerable areas more than places:



- 18/06
3. MF-AFFF – Fire Extinguisher: 10 Nos Newly procured and Installation is in progress



4. CO2 Fire Extinguisher: 10 Nos Newly Procured and Installation is in progress



5. AFFF Cans: 20 Nos Newly Procured and Installation is in progress



6. Foam Trolley: 200 Liter 4 Nos Newly Procured material delivery is in progress.

45



7. AFFF Cans – 20 liters – Newly Procured 25 No



8. Water Tanker with Pressure Pump. – Is in Progress

Sincerely

For Re Sustainability IWM Solutions Limited,

A handwritten signature in black ink, appearing to be "Saurav", written over a horizontal line.

Authorized Signatory

**46**

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

**ORIGINAL APPLICATION No.180 OF 2024**

Tribunal on its own motion-SUO  
MOTU

based on the news item published in  
Dinamalar, Chennai Edition dt  
20.05.2024

And

Tamil Nadu Pollution Control Board  
Through its Member Secretary  
Chennai and others

...Respondents

**REPLY ALONG WITH ANNEXURES**

**M/s. T.HEMALATHA (2021/2008)  
R.RAJMOHAN (2029/2021)  
S.DEEPIKA (5263/2022)  
COUNSEL FOR RESPONDENT NO.3**

**9940294233 / 9445754880**