



**Regional Office, Karnal Region
Haryana State Pollution Control Board**

2nd floor, SCO- 78-79 above Punjab National Bank, Namastey Chowk, Karnal
Website - www.hspcb.gov.in E-Mail Id- hspcbrokar@gmail.com

No. HSPCB/KAR/2020/ 5219

Dated: 09/10/2020

To

The Registrar General,
National Green Tribunal,
New Delhi. (Email Id - rg.ngt@nic.in & ngtpb.pg@gmail.com)

**Sub: - Submission of Action Taken Report - Order dated 31.10.2019 O.A.
No. 907 of 2019 titled as Satish Kumar & Ors. Vs. State of Haryana.**

Respected Sir,

In this regard, please find enclosed herewith the latest action taken report on behalf of Haryana State Pollution Control Board.

It is requested that the report be placed on record.

DA: As Above.

HC


Regional Officer
Karnal Region

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

OA No.907/2019

IN THE MATTER OF:

Satish Kumar & Ors

...

Applicant

Versus

State of Haryana

...

Respondent

**REPORT ON BEHALF OF HARYANA STATE POLLUTION CONTROL
BOARD IN COMPLIANCE OF ORDER DATED 31.10.2019.**

INDEX

Sr. No.	Particular	Page No.
1.	Action Taken Report	1-2
2.	Copy of Spot Inspection report dated 22.02.2020 along-with Analysis report – R/1	3-5
3.	Copy of Spot inspection report dated 21.09.2020 – R/2	6-8
4.	Copy of unit letter dated 21.09.2020 – R/3	9

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

OA No.907/2019

IN THE MATTER OF:

Satish Kumar & Ors. ... Applicant

Versus

State of Haryana ... Respondent

**REPORT ON BEHALF OF HARYANA STATE POLLUTION
CONTROL BOARD IN COMPLIANCE OF ORDER DATED
17.07.2020.**

MOST RESPECTFULLY SHOWETH:

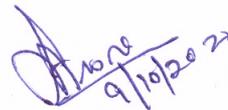
1. That this Hon'ble Tribunal took notice of the complaint letter alleging illegal burning of tyres for extracting oil at Village Khedi Mansingh, Tehsil Indri, District Karnal, Haryana causing damage to the environment and the public health. The Hon'ble Tribunal directed the answering Board to look into the matter and submit the report with regard to compliance of environment norms.
2. That the answering Board submitted its report dated 09.10.2020. apprising about the anti pollution control measures taken by the unit w.r.t. air emissions from the unit. This Hon'ble Tribunal vide order dated 17.07.2020 desired the report w.r.t. compliance to order of this Hon'ble Tribunal on the regulatory measures with regard to burning of tyres as per order of this Tribunal in OA No.400/2019, Social Action for Forest Environment (SAFE) Vs UoI & Ors.
3. That is humbly submitted that when the unit was inspected on 22.02.2020 and samples of air emissions were taken, the compliance of Standard Operating Procedure (SoP) were also

verified. The unit was found in compliance of SoP. The report w.r.t. Standard Operating Procedure as observed on 22.02.2020 is annexed herewith as **Annexure-R/1**.

4. That after the order dated 17.07.2020 was passed, the unit was inspected again on 21.09.2020. The unit was not in operation and it was stated on behalf of unit that unit is not in operation due to non-availability of migrant labour. Due to non-operation of the unit, all points of SoP could not be re-verified but which could be verified by physical inspection, those were verified. The compliance status of SoP as per physical inspection on 21.09.2020 is annexed herewith as **Annexure-R/2**. The letter dated 21.09.2020 submitted by the unit about its closure is annexed herewith as **Annexure-R/3**.

5. That as per inspection carried out from time to time, it can be submitted that unit is not burning the tyres rather it is engaged in recovery of pyrolysis oil from waste tyres by heating the same in sealed chambers. The gas is being used as a fuel. The unit is having CTO valid upto 31.03.2028 under the Air Act, 1981 & the Water Act, 1974 and Authorization under HOWM Rules, 2016 upto 31.03.2023. It is submitted that strict vigil shall be kept to ensure that SOP is being complied fully by the unit during its operation phase.

The report is submitted accordingly for kind consideration. It is undertaken to comply with the directions passed by this Hon'ble Tribunal.


9/10/2020

**Regional Officer, Karnal Region
Haryana State Pollution Control Board**

Place: Karnal
Date: 9/10/2020

Spot Inspection Report - 22-02-2020

M/s Aces Builders and Contractors
Prvt Ltd, Vill - Khesi Mann Singh, Near
Indri, Karnal

Sr. No.	SOP Guidelines	Compliance Status
2.1.1	The feed to the pyrolysis reactor should be devoid of steel. After removal o steel wire the tyre can be put either in the form the crumbs or chips (which can be made simply by cutting without going for the shredding process). Further the feeling arrangement of the rubber crumb to the reactor should be mechanized.	complying at time of inspection ^{Karnal}
2.1.2	The initial heating of the reactor should be done by liquid fuel or gas. The flue gas should be released to the environment through a chimney of at least 30 meters height.))
2.1.3	After initial heating, during the pyrolysis process, the pyro gas generated within the plant should be used as a fuel.))
2.1.4	Excess pyro gas if any should be flared through properly designed flaring system of adequate capacity considering the emergency situation in which the entire gas may have to be flared. The flaring should be done at a minimum height of 30 meter.))
2.1.5	Adequate instrumentation for measurement and control of temperature and pressure along with safety interlocks situation in case of increase of temperature pressure to cut off heating of the reactor should be provided. Automatic control systems such as programmed logic control (PLC) shall be adopted. It should be ensured that the reactor is under positive pressure all the time.))
2.1.6	In order to control fugitive emission from the reactor during operation, proper sealing should be ensured.))
2.1.7	The collection of the oil from the condensers should be in closed vessel and storage also should be in closed tanks with suitable vents. There should be no manual handling of oil. Transfer of oil should be through pumps.	Storage drums provided
2.1.8	At the end of the pyrolysis process the reactor has to be cooled before the removal of carbon. During this process, the reactor should be purged with nitrogen.	Screw conveyor collects carbon and directly feeds in bags.

2.1.9	The removal of carbon should be stated after the reactor's temperature has come down to below 50 °C.	
2.1.10	The removal of carbon should be through a mechanized system and it should be ensured that no spillage takes place during the collection of the carbon in the bags.	Complying, as alarm is provided.
2.1.11	Adequate number of sensors along with alarm system should be provided at suitable location throughout the plant to detect any leakage of flammable vapors from the system.	Fire Hydrant pumps provided.
2.1.12	Adequate firefighting system like sprinklers and fire hydrant with necessary pumping system and water storage should be provided.	Separate storage for carbon
2.1.13	The plot size should be adequate for storage of crumb or cut tries, oil and carbon blank in addition to the pyrolysis plant and accessories as well as enough space for movement of fire tender in case of any emergency. A minimum indicative size of small plant is about 3000 square meters.	And fire with large diameter Complying
2.1.14	The plant shall possess clearance certificates issued by concerned departments.))
2.1.15	The carbon black and the oil obtained from the process should be supplied only to actual users/processors.	ETP treats wet scrubber's
2.1.16	The waste water generated in the process from condensers or any scrubbers should be properly treated in an effluent treatment plant and the sludge generated should be sent to TSDF.	effluent; same is used again.
2.1.17	Oil containing water condensate should be treated in suitable ETP. Oily sludge/residues should be disposed through TSDF.))))

Remarks:-

During inspection it was found to be in compliance.

[Signature]



ftms - 15505

Page | of |

5

Type of Sample: -Monitoring
HARYANA STATE POLLUTION CONTROL BOARD's
Laboratory (HQ)
SCO-115, 1st & 2nd Floor, Sec-25, Panchkula, Haryana

F.R. [Signature]
Regional Officer
Sc 'B' A.E.E.-I, II, III
J.E.E. Clerk
a/3/20

To

The Member Secretary,
Haryana State Pollution Control Board
Panchkula

Report No. : 626
Dated: 03-March-2020

Description of Sample: - Received a sample of Stack/process emission on 22-February-20 collected by **Sh. Hardik, AEE** of the Board Collected from premises of the **M/s Acer Builders and Contractors Pvt. Ltd., Indri, Karnal** on 22-February-2020. The sample has been analyzed from 22-February-20 to 03-March-2020. The analysis report is as follows: -

1. Sample Code 626

FIELD OBSERVATION

- | | |
|---------------------------------------------|--------------|
| 1. Name of plant Section * | - |
| 2. Stack Attach to * | Wet scrubber |
| 3. Normal operating Schedule (hr/day) * | 10 |
| 4. Type of Chimney * | Metal |
| 5. Stack Height from the ground level * | 20 m |
| 6. Diameter of stack * | 0.65 m |
| 7. Stack Temperature Deg.C * | 118 |
| 8. Average stack velocity m/sec * | 6.27 |
| 9. Quantity of Emission m ³ /sec | 2.0 |

TEST REPORT

<u>S.No.</u>	<u>Parameter Name</u>	<u>Result</u>	<u>Result</u>	<u>Limit</u>
1.	Suspended particulate matter mg/m ³	102.6		150
2.	Sulphur dioxide mg/m ³	11.5		
3.	Nitrogen dioxide mg/m ³	8		

Sample Collected/Not Collected by us
Sample Consumed in testing
CC to Member Secretary
CC to Regional Karnal

[Signature]
JSA1
Manjali

[Signature]
JSA2
Kiran Bala

[Signature]
Sc-B
Dr. Pinki Jangra

[Signature]
Analyst
Harish Chandra

[Signature]
LABORATORY INCHARGE
Dr. Jai Bhagwan

The test report relate only to the particular sample submitted for testing.

*This information is provided by Field Officer.

BDL - Below Deduction Limit.

Spot Inspection Report

M/s Access Builders and Contractors Pvt Ltd, vill - Khori Mann Singh, Indoh

Date of Inspection Karnal.

By- 21/9/20.

Sr. No.	SOP Guidelines	Compliance Status
2.1.1	The feed to the pyrolysis reactor should be devoid of steel. After removal o steel wire the tyre can be put either in the form the crumbs or chips (which can be made simply by cutting without going for the shredding process). Further the feeling arrangement of the rubber crumb to the reactor should be mechanized.	The unit has been previously inspected on 22/2/20; 4/6/19; the sample reports shows the emissions within permissible limits. Unit is currently non-operational. The mechanised system is provided.
2.1.2	The initial heating of the reactor should be done by liquid fuel or gas. The flue gas should be released to the environment through a chimney of at least 30 meters height.	The unit has provided a 35 m. stack for flue gas.
2.1.3	After initial heating, during the pyrolysis process, the pyro gas generated within the plant should be used as a fuel.	Connections exist for using pyro gas as fuel.
2.1.4	Excess pyro gas if any should be flared through properly designed flaring system of adequate capacity considering the emergency situation in which the entire gas may have to be flared. The flaring should be done at a minimum height of 30 meter.	Stack of 35 metre has been provided for flue gas.

ACEE
HSPCB

RD HSPCB
21/9/2020

2.1.5	Adequate instrumentation for measurement and control of temperature and pressure along with safety interlocks situation in case of increase of temperature pressure to cut off heating of the reactor should be provided. Automatic control systems such as programmed logic control (PLC) shall be adopted. It should be ensured that the reactor is under positive pressure all the time.	Automatic control system is provided for measurements and control of temp. at site. Unit found complying in this aspect on 22/2/20. Currently lying closed.
2.1.6	In order to control fugitive emission from the reactor during operation, proper sealing should be ensured.	Reactor is having proper sealing system. However, since unit was closed so fugitive emissions
2.1.7	The collection of the oil from the condensers should be in closed vessel and storage also should be in closed tanks with suitable vents. There should be no manual handling of oil. Transfer of oil should be through pumps.	couldn't be verified. Tanks for storage of oil from condensers in closed vessel with vents. Pipe system provided for handling / transfer
2.1.8	At the end of the pyrolysis process the reactor has to be cooled before the removal of carbon. During this process, the reactor should be purged with nitrogen.	of oil with pumps. Unit was closed, hence the same couldn't be checked. However, unit has Nitro-gen cylinders in premise.
2.1.9	The removal of carbon should be stated after the reactor's temperature has come down to below 50 °C.	Can only be verified in an operating plant.
2.1.10	The removal of carbon should be through a mechanized system and it should be ensured that no spillage takes place during the collection of the carbon in the bags.	Mechonised system with screwing method provided.

ACEE
HSPCB

Chom
21/9/20

2.1.11	Adequate number of sensors along with alarm system should be provided at suitable location throughout the plant to detect any leakage of flammable vapors from the system.	3 no. sensors with alarm system provided at site.
2.1.12	Adequate firefighting system like sprinklers and fire hydrant with necessary pumping system and water storage should be provided.	• Fire hydrants and moving sprinklers provided.
2.1.13	The plot size should be adequate for storage of crumb or cut tries, oil and carbon black in addition to the pyrolysis plant and accessories as well as enough space for movement of fire tender in case of any emergency. A minimum indicative size of small plant is about 3000 square meters.	• Plot size is adequate for movement of fire tenders.
2.1.14	The plant shall possess clearance certificates issued by concerned departments.	• Plant is having clearance from HSPCB, DTP, Forest Dept.
2.1.15	The carbon black and the oil obtained from the process should be supplied only to actual users/processors.	• Unit has submitted the documents and bills of supplies.
2.1.16	The waste water generated in the process from condensers or any scrubbers should be properly treated in an effluent treatment plant and the sludge generated should be sent to TSDF.	• Unit has installed ETP for treatment of water generated from wet scrubbers, energy meter exists.
2.1.17	Oil containing water condensate should be treated in suitable ETP. Oily sludge/residues should be disposed through TSDF.	• by EPIL Agreement is done. • Wet scrubbers effluent is routed to ETP for treatment.

Remarks:-

effluent is routed to ETP for treatment.

[Signature]
A.C.C.
HSPCB

[Signature]
Rd HSPCB
21/9/2020

[Signature]



DATED → 21-09-2020

To

The Regional Officer

Haryana State Pollution Board

Karnal.

AEE

F.R.
Regional Officer
Sc 'B' A.E.E.-I, II, III
J.E.E. Clerk
21/09/2020

SUBJECT → Non operation of the type Pyrolysis Plant.

Sir this is to bring it in your notice that pyrolysis plant situated at Vill Kheri Mann Singh Tehsil Jindri Karnal is currently non operation due to non availability of migrant labour due to COVID-19.

For Acer Builders and Contractors
Private Limited

Director

Director → Acer Builders &
Contractors Pvt Ltd.

