

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

Original Application No.73 of 2021 (SZ)

IN THE MATTER OF:

Visakha Pawan Praja Karmika
Sangham, Andhra Pradesh

...Applicant

:Vs:

Union of India
Rep. by its Secretary,
Ministry of Environment, Forest & CC
Indira Paryavaran Bhavan,
Jorbagh, NewDelhi-110 003 and Others

... Respondents

**REPLY STATEMENT FILED ON BEHALF OF
THE RESPONDENT - HPCL.**

**M/s. KING & PARTRIDGE
ADVOCATES FOR 7th RESPONDENT**

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:Vs:

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Ministry of Environment, Forest & CC
Indira Paryavaran Bhavan,
Jorbagh, NewDelhi-110 003
2. Union of India
Rep. by its Secretary
Ministry of Petroleum & Natural Gas,
Sastry Bhavan, New Delhi-1
3. Central Pollution Control Board
Rep. by its Chairman
Parivesh Bhavan,
East Arjun Vihar, New Delhi-110 032
4. State of Andhra Pradesh
Rep. by its Chief Secretary,
Government Complex,
Velagapudi, Guntur District
Andhra Pradesh-522 503
5. Andhra Pradesh Pollution Control Board
Rep. by its Member Secretary,
D.No.33-26-14/D2
Near Sunrise Hospital, Pushpa Hotel Center
Chalamvari Street, Kasturibaipet
Vijayawada, Andhra Pradesh-520 010
6. District Collector and Magistrate
Main Road, Krishna Nagar,
Maharani Peta, Vishakhapatnam
Andhra Pradesh-530 002.
7. M/s.Hindustan Petroleum Corporation Limited
Rep. by its Chairman & Managing Director
Malkapuram Post, Vishkhapatnam
Andhra Pradesh-530 001

...Respondents



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एच.पी.सी.एल. - विशाख रिफाइनरी
H.P.C.L. - Visakh Refinery

**REPLY STATEMENT FILED ON BEHALF OF HINDUSTAN
PETROLEUM CORPORATION LIMITED – 7th RESPONDENT**
(ORIGINALLY 9TH RESPONDENT)

It is respectfully submitted as follows:

The address for service of all notices and processes on the 7th Respondent is that of its advocates M/s. King & Partridge, "Catholic Centre", 108, Armenian Street, Chennai 600 001.

1. This Respondent, Hindustan Petroleum Corporation Limited, is a Government Company and a Central Public Sector Enterprise, which is ultimately owned and controlled by the Government of India. This Respondent, as a responsible Public Sector Undertaking, not only complies with all the environmental laws, but is also socially responsible and undertakes a lot of activities towards the betterment of the society at large. This Respondent craves leave of this Hon'ble Tribunal to add to or amend its reply and place any relevant material for the consideration of the Hon'ble Tribunal, if necessary.
2. At the outset, this Respondent specifically denies all the averments and allegations contained in the application except those that are specifically admitted hereunder as true and put the applicant to strict proof of all the other allegations made in its Application.
3. At the further outset, this Respondent states that the incidence of fire as also other incidences mentioned in the List of Dates and Synopsis accompanying the application are misleading and Respondent denies the various allegations made by the applicant. Further, the reliance placed on the order of the Principal Bench of the Tribunal is misplaced and it is submitted that this order has no relevance to the facts applicable to this Respondent.
4. It is submitted that the Respondent's Visakhapatnam Refinery is having a name plate capacity of 8.33 Million Metric Tonnes per annum (MMTPA) and having a valid Consent For Operation (CFO) for 10 MMTPA. The refinery operating capacity is in the range of 9 to 9.78 MMTPA. Moreover, Respondent's Visakhapatnam Refinery has obtained and possesses all the necessary environmental consents to operate its



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Refinery and complies with the conditions imposed upon it by the environmental authorities.

5. Para I to II of the application are general in nature and require no reply.
6. With regard to para III to IV of the application, the same are related to applicant society, formation and substantial questions raised in this case by the Applicant. The Applicant is put to strict proof of the same as also the representative character of the association. It is stated that the answering Respondent has never received any complaint from any of the constituent member of the association. It is specifically denied that the residents near the Refinery are facing severe health hazards such as eye, skin, lung, heart, breathlessness, nausea, etc. diseases, due to Respondent's Visakh Refinery or otherwise, as alleged or at all. It is further denied that Respondent's Refinery is responsible for pollution as alleged. It is submitted that Respondent's Refinery meets with the Pollution norms and standards.
7. With regard to para V, it is submitted that the Applicant Society has sought to mislead the Hon'ble Tribunal by alleging that "*the activities by the industry are against the Environment Protection Act,.....etc*" without specifying as to which Company or organisation the Applicant is referring to. With regard to para VI of the application, this Respondent humbly submits that it is in compliance with all applicable law, rules, regulations, directions, orders, consents to operate etc., and there is not even a prima facie case made out on the various allegations by the applicant, and these allegations are just baseless statements without any supporting evidence. All approvals, Consent, permission from statutory authorities are in place for operation of Respondent's operation of the Refinery and the learned authorities while issuing such approvals, consent, permissions, have issued them after being satisfied with compliance of statutory norms required for the same. The respondent is a responsible Central Public Sector Undertaking and carries out its operations in compliance with all statutory norms and it gives utmost importance to the statutory compliances. It has thus highest regard for the environmental issues and have taken various


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steps to ensure pollution free environment in and around the refinery complex. It is humbly submitted that the Applicant could very well have sought information from the State Pollution Control Board as to whether Respondent is in compliance with all the pollution norms, but has chosen to file this baseless and false Application. It is denied that there are any substantial questions relating to the environment in so far as Respondent's Visakhapatnam Refinery is concerned.

8. With regard to para 1 of the application, it is submitted that Study had been conducted by IISc, Bengaluru and report was submitted in February 2016. This Respondent has complied with the recommendations pertaining to it. Compliance report is attached as

Annexure-I.

9. With regard to para 2 and 3 of the application, it is submitted that the contents are incorrect and misleading and is an incomplete narration. After the visit of the officials of the Ministry (MoEF), Respondent through its Visakh Refinery made a visit to Ministry's office in Delhi in December 2015 and made a detailed presentation informing that its Visakh Refinery has complied with all the observation points raised by the Ministry Officials during its February, 2015 visit. The MoEF team was satisfied with the presentation made by Respondent and accordingly MoEF granted EC clearance vide its letter bearing reference F.No. J-11011/63/2013-IA II (I) Dated 11.02.2016. The Respondent wish to place on record following compliances, in seriatim, with regard to the observations made by MoEF during inspection in Feb-2015:

i. During the period of inspection by MoEF in Feb-2015, the application for renewal of Consent For Operation (CFO) for Diesel Hydro Treatment (DHT) unit had already been made and was under process by APPCB. Subsequently, renewal CFO for DHT was issued with validity up to 31.12.2015. The Reference: Consent Order No: APPCB/VSP/VSP/210/HO/CFO/2015-2062 dated 16.03.2015.

Copy is enclosed as **Annexure-II.**

ii. As a routine procedure Respondent's HPCL-Visakh Refinery location is regularly carrying out Ambient air quality monitoring outside its refinery premises (Malkapuram) through a MOEF recognized third party Laboratory once in a month. Copy of latest report of the



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Laboratory is enclosed as **Annexure-III**. It is submitted that Respondent is successfully maintaining Ambient Air Quality in and around the refinery premises.

- iii. The respondent recycled stripped sour water from process units to the maximum possible extent with the available systems for use as wash water to the extent of 25 m³/hr. In order to maximise recycle, a new system is being implemented under current expansion project {Visakh Refinery Modernisation Project (VRMP)}. Post implementation of current modernization project (VRMP), the water will be recycled 100% through IETP.
- iv. The referred water consumption quantity was corresponding to pre DHT operation. At the time of visit, renewal of DHT CFO was pending which was issued subsequently. The total consented water consumption for Refinery post DHT commissioning is 812 m³/hr (i.e. 523 m³/hr for VRCFP + 289 m³/hr for DHT). The actual fresh water consumption including DHT was below the stipulated limit.
- v. The integration of ETP effluent discharge points cannot be done due to the invert elevations. Hence, the two canals join the main discharge canal just after the discharge points outside the boundary wall. The same has been communicated to MoEF.
- vi. Noise monitoring is carried out at the same locations and the values are within the limits. In addition, measures like usage of earmuffs, display of signage boards, restricting the duration of exposure etc., are followed. The same has been communicated to MoEF.
- vii. Online analyzers for noise monitoring were rectified subsequently and working.
- viii. Oily sludge in the refinery is being processed for recovery of oil. The recovered oil is reprocessed. The residual oily sludge is bio-remediated by Oil zapper bacteria of M/s OTBL (ONGC Teri Bio-Tech Ltd) and not incinerated. The Consent for Operation issued by APPCB indicates bioremediation as one of the modes of treatment for low oily sludge and which has been adopted. Hence, incinerator is not required.



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ix. As there is shortage of space in refinery, for this shortfall in greenbelt, tree plantation on a massive scale has been carried out in various locations of Visakhapatnam under "Green Visakha" program. The Green Visakha and Vanam Manam programs were taken up by Respondent's Visakh Refinery as per the directives of APPCB.

It was communicated to MoEF that a plantation of 4,50,000 saplings out of targeted plantation of 6,50,000 saplings completed in 2015 as part of "Green Visakha" program. The balance 2,00,000 saplings plantation was completed in 2016.

In addition, plantation of 10,000 saplings was completed in 2019 under "Vanam Manam" program.

Above plantation measures provide a green cover more than the present shortfall of greenbelt within the refinery. Further, Green belt is being developed in a vacant land in the vicinity of refinery under VRMP (modernisation project).

x. The MoEF team was satisfied with the presentation made by Respondent and accordingly MoEF granted it EC clearance vide its letter bearing reference F.No. J-11011/63/2013-IA II (I) Dated 11.02.2016.

xi. Paper advertisement regarding grant of EC has been given in the newspapers 'The Hindu' and 'The Eenadu' in March, 2008.

xii. Financial closure of the LPG mounded bullet project with reference to EC dated 07.03.2008 was 09.09.2009 and the cost was INR 116 Crores. Financial closure of the DHT (Diesel Hydrotreating Unit) Project with reference to EC dated 02.09.2009 was 01.06.2015 and the cost was INR 2462 Crores. The same was communicated to MoEF.

xiii. With reference to latest EC dated 11.02.2016 for VRMP, six monthly compliance reports are being submitted regularly. Also, these reports are updated on Corporate website of the Respondent. Similarly for earlier EC dated 02.09.2009 for DHT project, six monthly compliance reports were submitted regularly.



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- xiv. Display board at the main gate was replaced with a new board in 2016 for display of environmental parameters on continuous basis and was working. Further, a new LED display board with latest technology was installed and commissioned by end of March, 2021.
- xv. Housekeeping in refinery premises is carried out on regular basis and is a continuous activity.
- xvi. Further, this Respondent has complied with all the recommendations pertaining to its HPCL Visakh Refinery under the report of IISc submitted in February 2016. The compliance statement is already annexed as **Annexure-I**.
10. With regard to para 4 of the application, it is submitted that there are no violations of the conditions stipulated which warrant action by statutory authorities. Only after ensuring satisfactory compliance of all the major conditions, MoEF granted EC clearance vide F.No. J-11011/63/2013-IA II (I) Dated 11.02.2016.
11. With regard to para 5 of the application, it is submitted that the public hearing was conducted on 26.06.2015 under the chairmanship of Joint Collector & Additional District Magistrate after ensuring wide publicity for the public hearing. The participants in the public hearing meeting were people from the locality in the vicinity of Respondent's Visakh Refinery. The participants included local MLA, local union leaders, officers from Eastern Naval Command, nearby residents, representatives from various political parties etc., After ensuring satisfactory compliance of all the conditions, MoEF granted EC clearance vide F.No. J-11011/63/2013-IA II (I) Dated 11.02.2016.
12. With regard to para 6 of the application, the same are concerning APPCB. However, Respondent wish to make following submissions in regard to the various points raised in this said para:
- i. Simultaneous sampling of the treated effluent was carried out by MoEF recognized third party laboratory. The analysis results were found to be within the stipulated limits and the same was communicated to APPCB.


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- ii. Refinery emissions are monitored continuously and the emission parameters are maintained within the stipulated limits by ensuring required design & operational controls. Respondent's Visakh Refinery has submitted its replies communicating compliance as and when exceedance notices are received from APPCB.
- iii. Whenever information on odour issue was received, the location was visited and checked. Officials of the Respondent immediately interacted with the person who has provided the information. Checks were carried out inside the refinery during those instances and no abnormal conditions or odour has ever been observed. The same was communicated to APPCB. Leak Detection and Repair (LDAR) survey is carried out regularly through MoEF recognized third party laboratory to identify any leakages. Further, in line with the directions issued by the Task Force of APPCB, Respondent has placed a Purchase Order on M/s Glens Innovation Labs Pvt Ltd, Chennai, for conducting odour study at Respondent's Visakh Refinery, which will be vetted by IIT-Madras. The work will commence in April 2021. The same was communicated to APPCB.
- iv. Smokeless flare stack is maintained by ensuring complete combustion all the times. Black smoke is observed only during upset scenarios (disturbance in the plant working) for extremely short durations of time. In all such instances, the Pollution authorities have been kept informed or responded to immediately.
- v. Stack and CAAMS analyzers are calibrated once in a month to ensure proper functioning of the analyzers.
- vi. Construction of Hazardous waste transit storage facility was completed in the year 2014.
- vii. The indicated stream near slop tank area is from an internal drain and is routed for further processing and the outlet meets the stipulated limit. Simultaneous sampling of the cooling tower outlet was carried out by MoEF recognized third party laboratory. The results of the analysis were found to be within the stipulated limits and shared with APPCB.



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- viii. The PM levels in ambient air at 2 out of 3 locations are slightly on higher side due to the ongoing project activities. Mitigation measures like spraying water on the roads near civil works of project activities are being done regularly and the civil works are nearing completion. At other location, the high PM values are due to vehicular movement outside the refinery, which is not attributable to Respondent.
- ix. Simultaneous sampling of the treated effluent at the outlet was carried out by MoEF recognized third party laboratory. The analysis results were found to be within the stipulated limits and the same was communicated to APPCB.
- x. As regards online connectivity of stacks, it is submitted that refinery emissions are monitored continuously and the emission parameters are maintained within the stipulated limits by ensuring required design & operational controls. Any exceedance over the stipulated values have been promptly alerted and handled by Respondent's Visakh Refinery. The Respondent Refinery has submitted the replies for compliance as and when exceedance notices are received from APPCB.

13. With regard to para 7 of the application, as regards directions of APPCB are concerned, the Respondent submits as under:

- i. A Purchase Order has been placed by Respondent on M/s Glens Innovation Labs Pvt Ltd, Chennai, for conducting odour study at Respondent's Visakh Refinery, which will be reviewed and vetted by IIT-Madras. The work will commence in April 2021.
- ii. Leak Detection and Repair (LDAR) survey is being carried out regularly by MoEF recognized third party laboratory. Survey reports are being maintained and are shared during inspection by APPCB.
- iii. Respondent has always followed the emission norms and there is no violation of the standards or norms.
- iv. Elaborate and extensive gas detection system is available in the refinery to detect any process leakages.
- v. ETPs are in service and treated process water, treated cooling tower blow down are meeting the discharge standards including the heavy



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metals. Analysis reports of treated effluent by MoEF recognized third party laboratory for the past 3 months are provided as **Annexure-**

IV.

- vi. All the refinery emissions are monitored continuously for maintaining the parameters within the stipulated limits by ensuring required design & operational controls. All the ground level concentrations of pollutants are ensured within the stipulated limits. However, inside the Refinery, the PM levels in ambient air are slightly on higher side at a couple of locations, due to the ongoing project activities. Nevertheless, mitigation measures like spraying water on the roads near civil works of project activities are in place and the civil works are nearing completion.
- vii. Irrespective of the weather conditions, only low Sulphur fuels are used in the refinery. The fuels used are Low Sulphur Heavy Stock (LSHS), desulphurized fuel gas and Naphtha. Dedicated storage tanks are available for the low Sulphur liquid fuels from where fuel are supplied to all furnaces/boilers. Emissions from the refinery are monitored continuously and are within the stipulated limits.
- viii. This Respondent is fully compliant with the CFO conditions and the compliance status was communicated to APPCB periodically.
- ix. Further, the observation with regard to VOC condensers is not correct since the same are not installed in oil refineries. The same was communicated to APPCB.
- x. Original bank guarantee No. 0393NDLG00066021 dated 23.07.2020 executed by ICICI Bank, Mumbai, for Rs. 64,00,000/- (Rupees Sixty four Lakhs only) for compliance of directions was submitted by the Respondent to APPCB.
14. With regard to para 8 (i) of the application, it is submitted that the total quantity of raw material (crude oil) processed by Respondent's Visakh Refinery on annual basis is always within the consented quantity of 10 MMTPA only. However, slight variation in the actual quantities for lighter, middle and heavier distillates (products) against the limits stipulated by APPCB was observed on a few occasions. In view of this,



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Respondent had requested APPCB to revise the limits for quantities of products vide the CFO application dated 04.11.2020.

15. With regard to para 8 (ii) of the application, it is submitted that ETP-II treats the influent from process units by employing primary, secondary and tertiary processes. As ETP-IV is provided with state of the art facilities like SBR system, the treated effluent (outlet) from ETP-II is being routed to ETP-IV for further treatment. The facility to bypass ETP-IV is not used.

As indicated, only trace VOC concentrations were observed near ETP and other areas. Also, these VOCs are at grade level only.

It is submitted that storm water is clean. However, in order to contain any oil presence in the storm water American Petroleum Institute (API) separator is provided which will prevent any oil carryover in the storm water. Oil carryover is not observed at any stage. Further, comprehensive monitoring is carried out by MoEF recognized third party laboratory once every month. The air pollution loads are also within the stipulated limits.

It is further clarified that smokeless flare stack is maintained by ensuring complete combustion all the times. As stated earlier, black smoke is observed only during upset scenarios for very short durations.

16. With regard to para 15 (wrongly numbered) at page 25, which appears to be part of Para 8(ii) of the application, which deals with alleged deviation/non-compliance observed by consent/ authorisation directions, the Respondent submits that,

- i. the load based emissions are calculated regularly on monthly basis and are submitted to APPCB vide CFO compliance reports.
- ii. Stack and CAAMS analyzers are calibrated once in a month to ensure proper functioning of the analyzers.
- iii. Calibration of equipment/instrument is done at regular intervals.
- iv. Smokeless flare stack is maintained by ensuring complete combustion all the times. Black smoke is observed only during upset scenarios for very short durations. It is submitted that such short



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term scenarios are always monitored and remedial measures are immediately taken.

- v. Any release of safety relief valve is monitored continuously.
- vi. Consent conditions with respect to ambient air are being complied with this Respondent.
- vii. The drawal of sea water for cooling purposes is as permitted. The existing once through cooling water and cooling tower blow down are meeting the stipulated limits as per MoEF/CFO.
- viii. The quantities for drawal of sea water have been revised in latest CFO in line with stipulations of APPCB.
- ix. The respondent recycled stripped sour water from process units to the maximum possible extent with the available systems for use as wash water to the extent of 25 m³/hr. In order to maximise recycle, a new system is being implemented under current expansion project (VRMP). Post implementation of current modernization project (VRMP), the water will be recycled 100% through Integrated Effluent Treatment Plant (IETP).
- x. The existing effluent drains through cooling water and cooling tower blow down are meeting the stipulated limits as per MoEF/CFO.
- xi. Analysis of treated effluent from ETPs is being carried out by MoEF recognized & National Accreditation Board for Testing and Calibrating Laboratories (NABL) accredited third party laboratory on a regular basis. The results are found to be within the stipulated limits. The same are submitted to APPCB vide CFO compliance reports.
- xii. As regards, the observation on the bypass arrangement it is submitted that ETP-II treats the influent from process units by employing primary, secondary and tertiary processes. As ETP-IV is provided with state of the art facilities like SBR system, the treated effluent (outlet) from ETP-II is being routed to ETP-IV for further treatment. Accordingly, the facility to bypass ETP-IV is not used.
- xiii. In line with the recommendation of APPCB, used chemical drums are stored in closed sheds prior to detoxification.



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- xiv. As regards the recommendation for further development of the Green Belt, it is to be noted that there is shortage of space in refinery for further development of greenbelt, however, to compensate tree plantation on a massive scale has been carried out in various locations of Visakhapatnam under "Green Visakha" program. Plantation drive of 6,50,000 saplings started in 2011 and completed in 2016. Also, plantation of 10,000 saplings completed in 2019 under "Vanam Manam" program. Further, Green belt is being developed in a vacant land in the vicinity of refinery under VRMP (modernisation project). All these details are communicated to APPCB.
- xv. All the records pertaining to generation, storage and disposal of hazardous waste are being maintained. Hazardous waste returns (Form-IV) are being submitted to APPCB once every year as per guidelines.
- xvi. As regards the improvement of Bio remediation pond managements, it is submitted that Housekeeping at Bioremediation bins is being ensured on continuous basis. Photographs of the same are enclosed as **Annexure-V**.
- xvii. In line with the recommendations of the APPCB for conducting odour study, purchase order is placed on M/s Glens Innovation Labs Pvt Ltd, Chennai, for conducting odour study at Respondent's Visakh Refinery, which will be vetted by IIT-Madras. The work will commence in April 2021. The same was communicated to APPCB.
17. With regard to para 9 of the application, it is submitted that all the safety requirements are met and complied with. The safety requirements of storage tanks vary as per the product stored in the tank. Oil Industry Safety Directorate (OISD) guidelines provide the required safety aspects to be implemented for storage tank in a refinery. All the requirements, as stipulated by OISD, are complied with. The allegations regarding non-availability of water spray system, semi foam fixed system, auto foam system etc., are totally false and baseless and made without the required knowledge about the type of products stored and the safety requirements for those tanks.



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18. With regard to para 10 of the application, it is submitted that Smokeless flare stack is maintained by ensuring complete combustion all the times. Black smoke is observed from flare stack only during upset scenarios for very short durations. The allegation linking various diseases to rare instances of black smoke emission and odour is unfounded and has no scientific basis.
19. With regard to para 11 of this application, it is submitted that the incident mentioned in the photographs happened during power failure in the refinery operations and is one of its kind case. It is a black smoke and is not ash. It is to be noted that the smoke is emanated at elevation of 100 meters which is considered as a safe method of dispersion.
20. With regard to para 12 of the application, IISc has conducted detailed study and submitted a report with recommendations. The applicant has extracted the report dated 23.02.2016. This Respondent has taken note of the recommendations of IISC and adhering to the same as and when required. The compliance report is annexed as **Annexure-I**.
21. With regard to para 13 of the application, applicant has extracted the contents from the website of Indian coast guard and reproduced the same. This Hon'ble Tribunal has already removed the Indian Coast Guard as a party to the application, and this paragraph requires no response from this Respondent.
22. With regard to para 14 of the application, this Respondent vehemently denies the allegation made as the same is baseless, and made only to bring this Respondent into disrepute. The applicant is put to strict proof of the same.
23. With regard to para 15 of the application, it is submitted that order passed by NGT in O.A.No. 738 of 2018 is not applicable to this case.
24. With regard to para 16 of the application, it is submitted that as per the order of Hon'ble High Court, this Respondent has complied with the directions and pollution measures issued by APPCB. The High Court vide its Order dated 23.09.2019 disposed of the WP(PIL) No.259/2017 (pg no.395 to 400 of the OA) noting that answering respondent has



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H.P.C.I - Visakh Refinery

substantially complied with directions issued by the Andhra Pradesh Pollution Control Board ("APPCB") in its order dated 03.10.2016. Thus, the issues concerning 9 directions contained in the said order have attained finality and the Applicant is estopped from raising the same issues again before the Hon'ble forum. As regards recommendations made by APPCB in their inspection dated 26.04.2019, the same are being complied by the answering respondent. In pursuance to the IISc, Bengaluru Report, substantial compliances have been done by answering respondent. The water samples are taken at Ram Nagar and AKC colony. This Respondent states that it is not responsible for ground water pollution, and the Applicant has not shown any evidence of this Respondent causing the same. The applicant is put to strict proof of the same.

25. With regard to para 17 of the application, it is submitted that the contents of Grounds raised by the applicant are denied completely and the Applicant is put to strict proof of the rest.

26. With regard to para 18 of the application, it is submitted that this Respondent has not committed any violation or offence, let alone recurring offence as alleged by the applicant. Hence, the applicant is only trying to mislead this Tribunal by stating events that have no bearing on the present "Consent to Operate". The entire application is misguided and made with ulterior motive to bring this Respondent, a government company, and the other state authorities to disrepute, and so deserves to be dismissed without any relief to the applicant.

27. With regard to para 19 of the application, the applicant has failed to make out any ground for interim relief and it is submitted that the same ought not to be granted.

28. This Respondent reserves its right and craves leave of this Hon'ble Tribunal to submit further replies and documents to support its case before this Tribunal.



जी. भगवान
G. BHAGAVAN
उप महाप्रबंधक - तकनीकी
Dy. General Manager-Technical
एच.पी.सी.एल. - विशाख रिफाइनरी
H.P.C.L. - Visakh Refinery

It is therefore most respectfully prayed that this Hon'ble Tribunal may be pleased to dismiss the above application as against the 7th Respondent and thus render justice.

Dated at Chennai on this the 12th day of April 2021.

For King & Partridge



Partner.



जी. भगवान
G. BHAGAVAN
उप महाप्रबंधक - तकनीकी
Dy. General Manager-Technical
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H.P.C.L. - Visakh Refinery

Advocates for 7th Respondent

7th Respondent

VERIFICATION

I Gudala Bhagavan, working as Deputy General Manager - Technical in Visakh Refinery, Hindustan Petroleum Corporation Limited, of the 7th Respondent herein, do hereby declare that what is stated in the above paragraphs are true and correct to the best of my knowledge, information and belief.

Verified at Chennai on this the 12th day of April, 2021.



जी. भगवान
G. BHAGAVAN
उप महाप्रबंधक - तकनीकी
Dy. General Manager-Technical
एच.पी.सी.एल. - विशाख रिफाइनरी
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7th Respondent