

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

**Original Application No. 89/2020**

**IN THE MATTER OF:**

**JITENDRA SINGH**

**...COMPLAINANT**

**Versus**

**CENTRAL POLLUTION CONTROL BOARD & ORS**

**...ACCUSED**

**MOST RESPECTFULLY SUBMITTED:**

1. The above stated matter was listed today before this Hon'ble Tribunal. During the course of hearing the following clarifications were sought by this Hon'ble Tribunal from Respondent No. 4:
  - i Besides HCL scrubber, other preventive measures against (i) HCL handling and (ii) for gas detection systems are in place; and
  - ii With respect to inorganic chemicals - what all systems Respondent No. 4 has in place- description and numbers.
  - iii System and its linkages - Any SOP or any other system which are automatic preventive measures Respondent No. 4 has in place to prevent incident of gas from happening.

2. In this regard in addition to Annexure R-12 (already on record) an additional annexure is being annexed herewith as **Annexure R-32**.



**Counsel of Respondent No. 4**  
**KAPIL SAPRA & ASSOCIATES**  
ADVOCATES

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Dated: July 6, 2021  
Place: Delhi

**Point No.- 1 Preventive measures for (i) HCl scrubber/ Handling & (ii) Other than HCl**

- **HCl Handling :**
  - Dedicated location / Tanks/ Gas cylinder storage
  - Secondary containment including closed loop transferring system
  - Early detection system with alarm
    - Liquid HCl, 1 location, capacity- 80 KL (40 KLx2 nos) – 1 No. Sensor with alarm
    - HCl Gas cylinder stations- 27 Nos. sensor (Electro chemical type, class 1, Group A)
  - Preventive maintenance schedule for pumps, scrubber blower etc.
  - Log book for checking & maintain alkaline pH on regular basis
- **Other than HCl Handling :**
  - Dedicated location / Tanks/ Gas cylinder storage
  - Secondary containment including closed loop transferring system
  - Early detection system with alarm

Hydrogen Sensors: 34 nos.

NH3 Sensors: 20 Nos.

SO2 Sensors: 3 nos.

HBr Sensors: 03 nos.

MMA Sensors: 05 nos.

O3 Sensors: 01 nos.

CO Sensors: 01 nos.

CO2 Sensors: 01 nos.

Online Oxygen Analysers: 97 Nos.

Continuous emission monitoring system: 02 Nos

- Preventive maintenance schedule for pumps, scrubber blower etc.
- Log book for checking & maintain neutralizing agent on regular basis

**Point No.- 2. Inorganic chemicals – Systems & Nos**

- **Reception:**
  - Intelligent earth monitoring system with interlocks.( 7 Nos.)

*P. Patel*



- Tanker Secondary containment systems- Dyke with collection pit & close loop transferring system to ETP for treatment ( 5 Nos.)
- **Storage:**
  - Dedicated location / warehouse (15 Nos.)
  - Dyke/ Secondary containment for bulk storage (3 Nos.)
  - Fire protection system along with auto deluge system, sprinkler, foam monitor, heat & smoke detector (More than 2000 Nos.)
  - Overfill protection for all liquid storage along with instrumentation(e.g. Level transmitter , Flow transmitter & Pressure transmitter etc.) and interlocks hooked up with SCADA / HMI (73 Nos.)
  - Early detection system with alarm (e.g. HCl , Ammonia , Hydrogen, Hydrogen Bromide,CO2, CO , MMA , O2 , LEL, SOX , NOX, Particulate matter) – Approx. 350 Nos
  - Dedicated storage for all gases including cylinders (More than 10 Nos.)
- **Usages:**
  - Dedicated manifold station (more than 10 numbers) with leak detection system for each type of gases uses.
  - Overfill protection for all liquid storage along with instrumentation (e.g. Level transmitter , Flow transmitter & Pressure transmitter etc.) and interlocks hooked up with SCADA / HMI (20 Nos.)

### **Point No.- 3 System and its linkage**

- Control management system for all sensors / Detectors linked with SCADA (22 Nos.)
- Annual maintenance program & calibration schedule for all sensor / detector.
- Emergency Response team & First aiders (More than 100 Nos.)
- Dedicated Occupational Health center
- Spill control kit (More than 15 No)
- Fire suppression system (2 nos)
- Fire Detection and Alarm system (More than 2000 Nos)
- Fire sprinkler system (More than 2000 Nos.)
- Fire hydrant system (1 no- integrated)
- In-house Fire tender (2 Nos.)

