

**BY SPEED POST**

B-29016/IPC-I/Dye/ 2286

June 28, 2022

To

M/s. Panoli Intermediates (India) Pvt. Limited,  
Plot No. 157, 156 A & B, GIDC Nandesari,  
District Vadodra- 391340  
Gujarat

Sub: Directions under Section 5 of the Environment (Protection) Act, 1986  
-reg.

WHEREAS, Dye and Dye Intermediate units are identified as one of the 17 categories of highly polluting industries which have been discharging environmental pollutants directly or indirectly into the ambient air and water, having potential threat to cause adverse effect on the water and air quality; and

WHEREAS, the Central Government has notified the standards for discharge of environmental pollutants from various categories of industries under the Environment (Protection) Act, 1986 and the rules framed there under; and

WHEREAS, in order to investigate a complaint made against M/s Panoli Intermediates (India) Pvt. Ltd., Plot No. 157, 156 A & B, GIDC Nandesari, Vadodara, Gujarat, the Unit) were jointly inspected by Central Pollution Control Board, Regional Directorate, Vadodara and Gujarat Pollution Control Board on 27.09.2021 to assess the adequacy of the existing pollution control measures; and

WHEREAS, the inspecting team observed the following:

1. The Unit was found operational during visit.
2. The Unit has provided ammonia recovery system for the mother liquor generated from PNA Plant. During the visit, the ammonia recovery system was in operation and high intensity of odour of ammonia was felt inside the plant. This may be due to leakages during operation.
3. During visit, haziness in the environment near chlorine dosing tank and ammonia recovery system were observed. This may be due to uncontrolled dosing of chlorine in open tank leading to release of excess chlorine gas which mixes with fugitive ammonia gas and creates haziness and produces odour. Improper way of chlorine dosing is a threat to the environment and is related to operational safety also.
4. During the visit, huge yellow-orange fumes from the stack attached to spray dryer were observed indicating in-adequacy/non-functioning of APCD (Air Pollution Control Devices).
5. Fugitive emission/fumes from the salts stored in the spray dryer section were observed.
6. It was observed that roof of hazardous waste storage shed did not properly cover the entire required area. The hazardous waste storage area was not having any provision for collection of leachate and its transfer back to ETP.
7. Proper records for the presently stored quantity of hazardous waste, wastewater treated, MEE operation, spray dryer operation was not found

- at site during visit. Huge quantum of different types of hazardous waste was found stored.
8. Storage tank with name of Nitrobenzene was observed near hazardous waste storage shed. Nitrobenzene is not used in the Unit as raw-material or generated as product. Details about the permission, quantity etc. about the storage of such material was not available with the Unit. Organic layer on the accumulated water near the tank area indicates leakage from the tank.
  9. The Unit has not provided online connectivity of PTZ camera and flow meter as per condition of consolidated consent and authorization granted by Gujarat Pollution Control Board.

WHEREAS, on the basis of the aforementioned violations observed by the inspection team, CPCB on 03.11.2021 issued following directions under Section 5 of the Environment (Protection) Act, 1986 to the Unit:

1. The Unit shall immediately close its operations and shall not resume its operations till remedial measures on above observation are made, environmental norms are complied with and written permission to operate is obtained from Central Pollution Control Board.
2. The Unit shall take necessary steps to prevent the leakage of Ammonia from the Ammonia recovery system.
3. The Unit shall provide proper dosing system for carrying out the dosing of Chlorine in an environmentally sound and safe manner.
4. The Unit shall submit the safety audit report from an auditor competent under the Factory Act.
5. The Unit shall provide proper Air Pollution Control System to the stack of spray dryer as per consolidated consent and authorization granted by Gujarat Pollution Control Board.
6. The Unit shall take adequate steps to prevent fugitive emissions in the spray dryer section.
7. The Unit shall take adequate steps for proper storage and management of hazardous waste as per Hazardous & other Waste (Management and Transboundary Movement) Rules, 2016 with proper record maintenance.
8. The Unit shall provide adequate system for collection and treatment of the leachate generated from the hazardous waste storage area.
9. The Unit shall maintain proper records of effluent generation, treatment and reuse.
10. The Unit shall not store any chemical without the permission of Gujarat Pollution Control Board.
11. The Unit shall take adequate steps to prevent the leakage of any stored chemical.
12. The Unit shall provide online flow meter to the effluent treatment system and web (PTZ) camera in the effluent treatment area with online connectivity to Central Pollution Control Board / Gujarat Pollution Control Board.

WHEREAS, the unit submitted self-certificate dated 25.11.2021 that the unit had stopped production w.r.t. closure directions issued by CPCB; and

WHEREAS, it was verified by IT Division, CPCB on 01.12.2021 that the unit has provided online data connectivity of online continuous effluent Monitoring system (OCEMS) w.r.t flow meter and web camera; and

WHEREAS, the unit has submitted the adequacy report of the Effluent Treatment Plant (ETP) and Air Pollution Control Management (APCM) from the Civil Engineering Department, Faculty of Technology and Engineering, The Maharaja Sayajirao University of Baroda, Vadodara through Email dated December 21, 2021; which concluded that the ETP and APCM of the unit are adequate to treat and meet the effluent and emission discharge norms; and

WHEREAS, Gujarat Pollution Control Board inspected the unit on 17.01.2022 and 27.01.2022 respectively to verify compliance of directions and submitted compliance report on 04.02.2022 to CPCB and observed that the unit has complied with the directions issued by CPCB; and

WHEREAS, CPCB had constituted a three member committee vide office order dated 03.10.2017 having representative(s) from CPCB and MoEF&CC for examination and recommendation for revocation of the closure directions issued by CPCB; and

WHEREAS, the three-member committee in its meeting held on 08.02.2022 examined the compliance status of the Unit.

WHEREAS, as recommended by the aforementioned three member committee, CPCB on 16.02.2022 revoked the closure directions issued to the Unit with following conditions:

1. The Unit shall communicate the date of commencement of plant operations to CPCB and revocation of closure directions shall be for an initial period of three months after the commencement of the plant operations, and in case of compliance of the Zero Liquid Discharge and discharged emissions as per prescribed standards, further revocation would be deemed as having been granted.
2. The unit shall submit performance assessment of the Air Pollution Control System and Zero Liquid Discharge compliance by same Government Institution (The Maharaja Sayajirao University of Baroda, Vadodara) within 60 days of start of operation.
3. The Unit will ensure uninterrupted data connectivity of OCEMS with CPCB server.
4. The Unit will ensure periodic calibration of the OCEMS analysers as per standard operating procedure/recommendations of the supplier and submit the calibration results.

WHEREAS, the unit informed through letter dated 21.02.2022 that the operation of the plant has been resumed from 20.02.2022; and

WHEREAS, the unit through email dated 29.04.2022 submitted report on Performance Assessment of Air Pollution Control System and Zero Liquid Discharge Compliance prepared by The Maharaja Sayajirao University of Baroda, Vadodara ; and

WHEREAS, upon examination of the aforementioned report on Performance Assessment of Air Pollution Control System and Zero Liquid Discharge Compliance, following violations to the prescribed norms were observed:

1. Emissions from stack attached to Sulfuric Acid (SA) Plant were exceeding the prescribed norms w.r.t. Acid Mist ( $166 \text{ mg/Nm}^3 > 50 \text{ mg/Nm}^3$ ).
2. Emissions from stack attached to Liq. SO<sub>3</sub> Storage tanks of CSA Plant were exceeding the prescribed norms w.r.t. SO<sub>3</sub> ( $69.3 \text{ mg/Nm}^3 > 20 \text{ mg/Nm}^3$ ).
3. Emissions from stack attached to CSA Storage tanks of CSA Plant were exceeding the prescribed norms w.r.t. SO<sub>3</sub> ( $96 \text{ mg/Nm}^3 > 20 \text{ mg/Nm}^3$ ).
4. To estimate fugitive emissions, ambient air sampling near the Spray Dryer was carried out, wherein it was observed that the concentration of following parameters is exceeding the National Ambient Air Quality Standards viz. Particulate Matter- PM<sub>10</sub> ( $1854 \mu\text{g/m}^3 > 100 \mu\text{g/m}^3$ ) and Particulate Matter- PM 2.5 ( $898 \mu\text{g/m}^3 > 60 \mu\text{g/m}^3$ ).

WHEREAS on the basis of aforementioned violations, CPCB on May 18, 2022 issued following directions under Section 5 of the Environment (Protection) Act, 1986 to the unit:

1. The Unit shall immediately close its operations and shall not resume its operations till remedial measures on above observation are made, environmental norms are complied with and written permission to operate is obtained from Central Pollution Control Board.
2. The Unit shall take necessary steps so that the concentration of discharged emissions shall remain within the prescribed norms.
3. The Unit shall take adequate steps to prevent fugitive emissions in the spray dryer section.

WHEREAS, the unit has submitted self-certificate dated 23.05.2022 that the unit had stopped production w.r.t. closure directions issued by CPCB on 18.05.2022; and

WHEREAS the unit through letter dated 03.06.2022 has submitted the details of corrective measures that it has taken w.r.t. operation and maintenance of its Air Pollution Control System so as to bring the discharged emissions within prescribed norms; and

WHEREAS the unit through letter dated 03.06.2022 has submitted source emission monitoring report from the Government Institution, The Maharaja Sayajirao University of Baroda, which says that discharged emissions from Sulphuric acid plant, Liq. SO<sub>3</sub> storage tanks of CSA plant, CSA storage tanks of CSA plant are within the prescribed norms after taking corrective measures by the unit; and

WHEREAS the unit through letter dated 03.06.2022 submitted details of the steps taken by it to prevent fugitive emissions in the spray dryer section; and

WHEREAS, the three-member committee in its meeting held on 08.06.2022 examined the compliance status of the Unit and recommended that closure directions issued to the Unit may be revoked with following conditions:

1. The Unit shall communicate date of commencement of plant operation to CPCB and revocation would be for an initial period of three months after the commencement of the plant operation, and in case of

compliance of the discharge norms as per prescribed standards, further revocation would be deemed as having been granted.

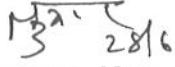
2. The unit shall submit emission monitoring reports of stack attached to Sulphuric Acid (SA) plant, Chloro Sulphuric Acid (CSA) plant and ambient air monitoring report of the area around spray dryer section from the same Government institute within 60 days from the date of resumption of manufacturing operations.
3. Gujarat Pollution Control Board shall keep constant vigil on the unit and shall periodically inspect the unit and submit report to Central Pollution Control Board.

WHEREAS, the Ministry of Environment & Forests, Government of India, vide Notifications No. S. O. 157 (E) of 27.02.1996 and S. O. 730 (E) dated 10.07.2002, has delegated the powers vested under Section 5 of the Environment (Protection) Act, 1986 (29 of 1986) to the Chairman, Central Pollution Control Board, to issue directions to any industry or any local body or any other authority for violations of the standards and rules notified under the Environment (Protection) Rules, 1986 and amendment thereof.

NOW, THEREFORE, in exercise of powers vested to Chairman CPCB under Section 5 of the Environment (Protection) Act, 1986, and in view of compliance with relevant direction under reference, the directions issued under the Section 5 of the Environment (Protection) Act, 1986 to the Unit, M/s Panoli Intermediates (India) Pvt. Ltd., Plot No. 157, 156 A & B, GIDC Nandesari, Vadodara, Gujarat vide letter dated 18.05.2022 is hereby revoked with following conditions:

1. The Unit shall communicate date of commencement of plant operation to CPCB and revocation would be for an initial period of three months after the commencement of the plant operation, and in case of compliance of the discharge norms as per prescribed standards, further revocation would be deemed as having been granted.
2. The unit shall submit emission monitoring reports of stack attached to Sulphuric Acid (SA) plant, Chloro Sulphuric Acid (CSA) plant and ambient air monitoring report of the area around spray dryer section from the same Government institute within 60 days from the date of resumption of manufacturing operations.
3. Gujarat Pollution Control Board shall keep constant vigil on the unit and shall periodically inspect the unit and submit report to Central Pollution Control Board.

In case of failure to comply with the aforesaid directions, necessary action as deemed fit under the provision of the Environment (Protection) Act, 1986 including imposition of environmental compensation / legal action will be taken by Central Pollution Control Board.

  
(Tanmay Kumar)  
Chairman

**Copy to:**

1. The Chairman :  
Gujarat State Pollution Control Board  
Sector 10-A, Gandhi Nagar- 382 043,  
Gujarat

To ensure constant vigil over the unit and periodic inspections of the unit with submission of report to CPCB.

2. The Chairperson :  
Madhya Gujarat Vij Co. Ltd.  
Sardar Patel Vidyut Bhavan,  
Race Course, Vadodara-390007

With request to restore electricity supply of Unit.

3. The Additional Secretary (CP Division)  
Ministry of Environment, Forests and Climate Change,  
Prithvi Wing, 2nd Floor,  
Room No. 216, Indira Paryavaran Bhawan  
Aliganj, Jor Bagh Road, New Delhi-110003

4. The Regional Director  
Central Pollution Control Board  
Parivesh Bhawan  
Opp VMC Ward office no 10  
Subhanpura, Vadodara - 390 023

✓ 5. D.H., IT, CPCB

6. D.H. IPC- VI, CPCB

  
**(B. Vinod Babu)**  
For Member Secretary