

No.PCB/SEO-CTA-67/Random-IR/2019/ 60

May 10, 2019

Inspection Notes of C.D.Kumar, SEO-Chitradurga & R.Gurumurthy, SEO-Bengaluru-City

Name of The Industry visited	M/s Shalini Enterprises, Plot #A-06, 3 <sup>rd</sup> Stage, Peenya Industrial Estate, Bengaluru 560058
Date of Visit	06.05.2019
Officers Accompanied	Chitra AEO
Person Contacted	Kiran, Occupier

It is a hazardous waste reprocessing viz spent solvent, containers/barrels/liners unit located in designated industrial estate. The unit was visited in view of the instructions issued in HO Memo dated 03.05.2019 under random inspection of organization identified based on computerized risk assessment. The Board has granted consents under both Acts up to 30.06.2023 and an authorization up to 30.06.2020 with conditions. The unit was in partial operation during visit and following are the observations.

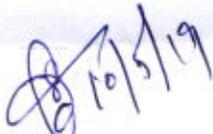
- The activity comprises of collection and transportation of spent solvents from pharma and chemical units, storage and vacuum distillation to recover solvents. Procurement and transport of used barrels/containers, cleaning/washing and disposal for re-use.
- For the trade effluents generated from solvent recovery process and containers washing activity common primary chemical treatment facility provided and partially treated effluents said to be disposed to CETP. Adequate secured temporary storage facility for partially treated effluents (before disposal to CETP) not provided. No records including passbook produced during visit to ascertain the quantity and quality of effluents being disposed to CETP on regular basis. The RO was instructed to secure records and to verify the same in this regard.
- The unit does not have vacant land within the premises to utilize the treated effluents for gardening besides the space available is also not adequate to carry out all the activities at full capacity. The RO was instructed to ascertain the adequacy of space to carry out the activities.
- Out of four closed type vacuum reactors one is kept idle which is proposed to be removed from the premises. For Briquette fired Boiler no APC measures including PH & PF provided. Also ash handling is not secured & scientific.
- Stock of about 30 Kgs of residue sludge stored in HDPE container noticed. No records regarding generation and disposal of Hazardous waste furnished during visit for verification.
- As regards to compliance to SOP for Spent Solvent recovery

1. HPPE drums provided for receiving spent solvents
2. Connection of vent of the tanker with spent solvent storage tanks provided
3. Solvent transfer pumps provided
4. Vent of all the storage tanks (spent & recovered solvents) not connected to condenser
5. Thermic fluid heater/electric heating system not provided
6. Vacume distillation columns provided
7. Secondary condenser with chilled water/brine as cooling medium not provided

8. VOC absorption media connected to vent of condenser not provided
  9. License from Petroleum & Explosive Safety Organisation GOI – Not obtained
  10. Installation of online TOC analyser at the vent outlet – Not provided
- As regards to compliance to SOP for reprocessing of empty barrels/containers
    1. No separate secured covered area provided for containers storage
    2. 7 days capacity storage sheds for storage of contaminated containers not provided
    3. Bund wall along containers storage & washing area – not provided
    4. Multiple jets for not provided for effective cleaning of containers
    5. Required water meters not provided
    6. Effluents are being collected and disposed to CETP for further treatment
  - The concrete flooring provided for process area, barrel storage area, solvent storage areas has damaged. The occupier was instructed to provide impervious flooring immediately.
  - All the operations are being carried out in congested area posing risk due to weather conditions.

The observations made during visit indicate that the industry is not in full compliance with the conditions stipulated in the consent and authorization besides not following the SOP in full prescribed for the operations. The Regional officer was instructed to issue notice immediately for the non-compliances. If the Occupier fails to take immediate action to improve the environmental conditions and to comply with all the conditions of consent and authorization action could be initiated as contemplated in the Water Act 1974 and HWM Rules 2016.

The photographs taken during visit are enclosed.

  
SEO - Chitradurga

M/s Shalini Enterprises, Plot #A-06, 3<sup>rd</sup> Stage, Peenya Industrial Estate, Bengaluru



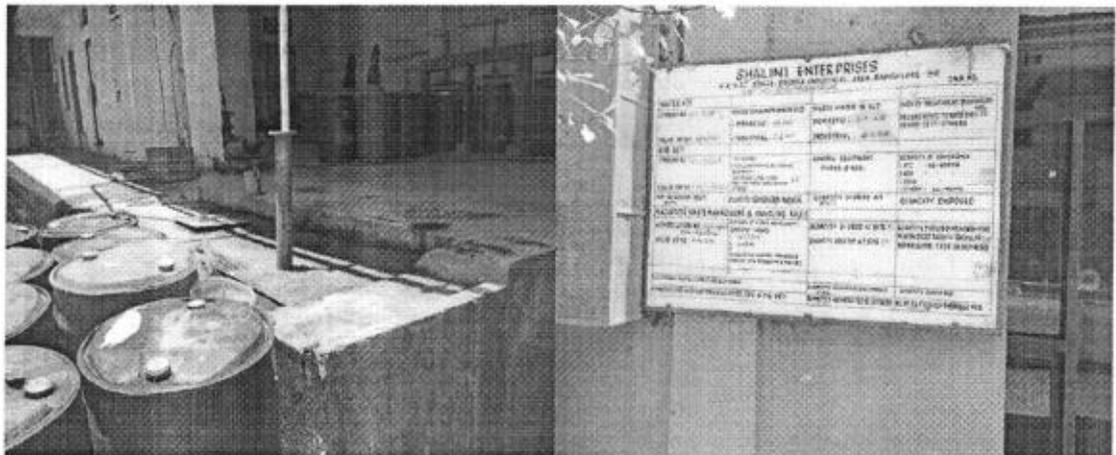
Distillation Kettles

Raw Spent Solvent Storage



Residue Storage Room

Containers Washing Area



Underground Effluents Collection Tank

Display Board