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நாள் :

To

Date: 21 June 2005

Hon'ble Mr. A Raja,
Minister of Environment & Forests
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Dear Mr. Raja.

This is regarding projects in SIPCOT Cuddalore that are coming up for review at the 41st meeting of the reconstituted Expert Committee (Industry) to be held on 29-30 June, 2005, at the MoEF.

I would like to draw your notice to the article in Frontline about the pollution in SIPCOT industrial complex of Cuddalore (Ref: "SIPCOT: Poison in the Air"; by Asha Krishnakumar, Frontline Magazine; June 17, 2005). Residents of SIPCOT Cuddalore have been complaining of pollution for the last twenty years. Their land, water and air have been poisoned by the toxics and poisons from the chemical units located in the region. The human health in this region has been severely compromised due to the industrial pollution in the area. Local communities complain that children and youth have suffered disproportionately. Pollution has affected children's mental, physical and sexual development, according to mothers living in SIPCOT.

As early as in 1998, the Tamilnadu State Human Rights Commission declared that public health in the SIPCOT industrial estate "cannot take more burden than that which has already ensued by the existing chemical industries." The report recommends that no more polluting industries be set up in the region. Apart from this SHRC report, several other reports, like, National Environmental Engineering Research Institute report of 1999, Indian People's Tribunal on Environment and Human Rights report of 2001, Supreme Court Monitoring Committee on Hazardous Waste report of 2004, indicate that the environment in the area cannot take any more burden of pollution.

It has been brought to my notice that there have been new proposals for setting up more polluting industries in the SIPCOT Phase II as a move to expand the industrial area.

One of the units proposed for the region is a Poly Vinyl Chloride (PVC) facility by M/s Chemplast Sanmar. I express my serious concerns over the proposed setting up of the facility since it is going to add to the toxic load in the already over-polluted environment. PVC is a known poison plastic. The raw material for manufacturing this substance is Vinyl Chloride Monomer (VCM), a chemical that is a known human carcinogen and is also highly explosive. Chemplast is set to come up not merely in the vicinity of human habitation but adjacent to an existing factory manufacturing explosive rocket fuel. This is an invitation to disaster. An incident in one factory could trigger an incident in the other leading to an uncontrollable disaster.

Moreover, the public hearing for this project was held in 2002 based on an EIA conducted in 1999, more than 5 years ago. At the statutory public hearing in 2002, the project was vehemently opposed by local communities and environmental groups. The International Finance Corporation, World Bank's private sector lending agency, subsequently cancelled Chemplast's loan application for the project in the face of the opposition from communities. In 2003, the project proposal relocated to Krishnapatnam, Andhra Pradesh. Even here, the local communities and all political parties rejected the project on grounds that PVC is a highly polluting industry. Now, with nowhere left to turn, the project has made a come-back to Cuddalore with a few cosmetic changes.

1. Instead of an incinerator to dispose VCM, the plant will install a vent gas scrubber.
2. Rather than draw groundwater, the company proposes to secure 2,800 cubic metres of water installing a desalination plant. However, the company also proposes to sink borewells to ensure availability of 2,800 cu. m of water for contingencies.
3. All wastes, including desalination rejects and trade effluents, will be discharged to sea.

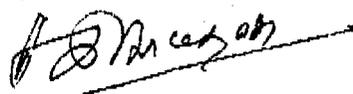
My concerns are two-fold. First, the objections raised against the PVC project (See "Evaluation of Chemplast EIA by Dr. Mark Chernaik, ELAW-US) cover a range of issues including provision of false information by the project proponent. The technical review commissioned by the TNPCB covers only two aspects, namely groundwater drawal and VCM incineration.

Second, in the five years since this project was first mooted, much has changed both with the project and the area where it is set to come up.

- The project includes plans for a marine terminal and pipeline to transfer carcinogenic and explosive Vinyl Chloride. What could be the potential fallout from such a project in the event of a Tsunami?
- A 2,800 cubic metre desalination plant is not a small unit. To put it in perspective, the controversial Coca Cola plant in Plachimada has a requirement of 1500 cubic metres of water per day. The quantity of rejects generated would be substantial. The rejects are not only highly saline, but also higher in temperature than the sea water that they are discharged to.
- The proponents also plan to sink borewells to draw 2800 cubic metres of water for contingencies. Given the high cost of desalination units, economics will dictate that borewell water, rather than the desalinated water is used for the process requirements.
- Given that it handles highly explosive and volatile chemicals such as Vinyl Chloride, Chemplast would have to demonstrate that its location adjacent to Pandian Chemicals – a manufacturer of the highly explosive rocket fuel Ammonium Perchlorate – poses no threat to the nearby residents.

All in all, what we know about the existing pollution load in Cuddalore would advise us against allowing any polluting industries there. Even setting aside issues of existing pollution in Cuddalore, the Chemplast project proposal contains hardly any details that would allow us to make a decision based on science. At the very least, a fresh and comprehensive EIA and public hearing must be commissioned before a decision can be taken. Even better, as per the recommendations of NEERI, a comprehensive Regional EIA should be ordered for the SIPCOT Cuddalore estate to assess whether the existing ground realities are conducive for setting up more polluting and water-intensive units in the area.

Sincerely,



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Encl: A copy of the Frontline article

- Evaluation of Environmental & Social Impact Assessment Report for the Proposed PVC Project at Cuddalore, Tamilnadu by Dr. Mark Chernaik, ELAW-US