

Groundtruths II: Status of Hazardous Wastes and Pollution in SIPCOT Chemical Estate, Cuddalore

Compiled by:

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December 2008

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Background to the Report:

In January 2005, SIPCOT Area Community Environmental Monitoring (SACEM) had presented a report titled "Groundtruths: Status of Hazardous Wastes and Pollution in SIPCOT Chemical Estate, Cuddalore" to the Supreme Court Monitoring Committee (SCMC) on Hazardous Waste. The purpose of the report was to brief the SCMC on the functioning of the SIPCOT units at that time. The report highlighted the various violations by "SIPCOT units" of hazardous waste regulations and Air and Water Acts.

In the three years since we published that first report, repeated representations about violations have been made to the SCMC, the now-defunct Local Area Environment Committee, the Tamil Nadu Pollution Control Board (TNPCB), Police and the District Collector. In most instances, the violators were not first-time offenders, but repeat law-breakers. Despite that no decisive action has been taken till date to repair the situation or punish those guilty for hurting public health and the environment.

Status of Regulations and Environmental Pollution in the SIPCOT Complex:

Air, Water Act Violations

Analysis of data made available by the TNPCB at its Library in Chennai as per an order of the State Information Commission under the Right to Information Act for proactive disclosure, dated 14 July 2008¹ shows that of the 34 units said to be functioning² in and around SIPCOT, Cuddalore:

- **At least 8 of them do not have a valid Consent to Establish;**
- **22 are operating without a valid license under Air and Water Acts.**
- **At least 17 of them do not have a valid authorization under the Hazardous Waste Rules.**
- **5 out of 7 SIPCOT units that require CRZ clearance do not have this clearance from the Ministry of Environment and Forests.**

Violations of license and authorisation regulations are prosecutable offences under Air and Water Acts requiring stringent civil and criminal reparations. No unit can lawfully function without these permissions. Till date, not one prosecution has been initiated against any of the errant officials in SIPCOT industries.

EIA Notification violations

Under the EIA Notification, 1994 and its replacement -- EIA Notification, 2006 – certain categories of industries are required to conduct Environmental Impact Assessment reports and obtain clearances from the Central Government and the TNPCB before commencing construction.

In SIPCOT, at least five instances of illegal construction have so far been brought to the notice of the TNPCB. No action has been taken by the Board. Indeed, any halt to the illegal construction by the District Administration or the Courts have been merely temporary, with the Board granting post-facto clearance to the facility without there being any specific legal provision to allow it to do so. Once again, no prosecution has been launched against the errant company officials. Violations of the Environment Protection Act, under which the EIA Notification was issued, are prosecutable offences.

Tagros Chemicals:

On 5 December, 2008, SACEM complained to the TNPCB, Inspectorate of Factories and the District Collector about unlicensed construction of a new unit at Tagros Chemical. This is not the first time that Tagros has constructed without license.

In August 2004, TNPCB was made aware that Tagros Chemical had commenced production of new

1 The State Information Commission directed the Pollution Control Board in Case No 5619/enquiry/2008 through a hearing held on 14.07.2008, to provide particulars relating to consent to establish, consent to operate, authorisation under hazardous waste management rules from the year 2007 under the section of proactive disclosure. The Commission ordered the PCB to "follow Section 4(1) (b), 4 (2) and 4 (3) so that public can make use of the same and obtain information once these information are provided either in website/ internet or in the library..."

2 The number of units operating in the SIPCOT area is not fixed at any point of time. In the past there also have been phases where only 20 units were in operation.

chemicals at a production unit that had been erected without Consent to Establish from the TNPCB since 2002. On 7 September 2004, the TNPCB and the District Collector officiated a public hearing to consider the company's proposal to set up a new unit and expand production. TNPCB and the Ministry of Environment and Forests knowingly went through the ritual of public hearing, albeit post facto. Finally the clearance was granted to the unit in mid 2005. In the three years that Tagros Chemicals operated its illegal production unit, several instances of gas leaks and accidents were reported and at least 1 person died in the accidents at that unit.

In case of Pioneer Jellice India, the company constructed five storeys of its new factory without Consent to Establish. This illegality too was rewarded with a post-facto Consent to Establish by the TNPCB upon the intervention of the Court.

CUSECS:

Cuddalore SIPCOT Industries Common Utilities Ltd (CUSECS) was commissioned in 2000 as an effort to collect and transport the treated effluent from SIPCOT units to the sea. The unit has been operating for the last eight years without obtaining the necessary mandatory licenses of Consent to Establish and Consent to Operate under the Air and Water Acts. Even the CRZ Clearance to the unit was given post-facto after five years of its operations in 2005. At least 5 show-cause notices have been issued by the TNPCB on the unit since 2000, for its failure to adhere to effluent standards prescribed by the Board. While the TNPCB addresses the issue of violation in effluent standards, it chooses to ignore the serious violation of the illegality of the unit itself under the Air and Water Acts.

Emboldened by the inaction of the TNPCB or the Ministry of Environment & Forests, even new companies looking to set up in SIPCOT pay no attention to environmental clearances. On 22 November 2007, the village monitoring group alerted the TNPCB of illegal construction of a boundary wall at the proposed site of Narmada Chemicals. Though the construction was stopped immediately after the complaint, no legal action was taken against the unit. One year later, on 17 November 2008, village monitors caught Narmada Chemicals drilling bore-wells within its premises. On 5 September 2008, SACEM reported leveling of ground and boundary construction work, at the proposed site of Aria Chemicals. Both companies do not have a Consent to Establish under Air or Water Acts.

Role of TNPCB in implementing the law and regulating the errant units:

TNPCB has failed in carrying on with its duties in SIPCOT Cuddalore. While in most cases TNPCB has stopped dismissing our complaints without investigation, the quality of investigation, scientific understanding of the officials, their unwillingness to implement the laws and the lack of culture of sharing information with the communities are still matters of serious concern.

a) Lack of political will to implement law:

At a time when even the legally permitted factories are significant polluters, there is no explanation for the lack of action against unlicensed factories by the TNPCB and the MoEF. All the ongoing violations referred to in this report have been brought to the notice of the TNPCB. Details of licenses are available with TNPCB.

Any statutory action by TNPCB against violators has come only after much prodding. Seldom has the action run its logical course. In the rare instance where the TNPCB issues closure orders, the factories use their political clout to prevent closure or reopen within days of closure.

The Board does not acknowledge community complaints against individual polluters, and fails to factor in the experience of the public while preparing the compliance reports of individual industries to their respective Consents to Operate. "Generally complied" has become a euphemism for "Not complied." The District Environmental Engineer (DEE) helps thwart regulatory and corrective action against polluters by downplaying the extent of non-compliance to consent conditions.

Violation of Consent Conditions, particularly repeated violations, are prosecutable offences. However, corrective or punitive action is avoided even in cases where the Renewal of Consent Report records numerous instances of non-compliance. The Renewal of Consent reports conclude with a general

recommendation by the DEE for consent renewal despite the numerous violations that may have been recorded in the same report. Further, the report seldom reflects the number and nature of community complaints against the unit.

It is also noticed that the TNPCB views issue of shown-cause notices as the end of the action, while legally it is the first step in initiating action on the violators. There are many show-cause notices where the unit has not even bothered to respond and still the TNPCB has not taken any legal action on the units. On a few occasions show-cause notices have been issued on different units highlighting violations under Environment Protection Act enumerating instances of discharge of toxic chemicals on land, air and water, but in hardly one or two of them there is an attempt to take the procedure to its logical end.

b) Failure to take decisions that are backed by evidence and science. :

1. **Unscientific and vague response to specific community complaints:** On numerous occasion the SACEM monitors have reported high levels of odour from the SIPCOT units to which the TNPCB has responded by stating “industries in SIPCOT were continuously taking action to control odour pollution.” It is quite known that odour from chemical units imply leakages of toxic gases from these units. In the past, SACEM through its bucket samples have proven the presence of toxic chemicals on instances of high odours from the unit. Even then the TNPCB in its response merely provides assurances instead of outlining actions taken.
2. **No quantification of pollution:** TNPCB continues to use “high” and “low” to describe air pollution rather than quantifying the pollution and comparing it to Indian or equivalent US Environment Protection Agency regulatory levels.
3. **Inability to analyse scientific data:** Routine air and water pollution incidents that violate Air and Water Acts are recorded through TNPCB's own monitoring or mandatory monitoring by industries as per conditions imposed by the Board in individual industries' Consents to Operate. However, the monitoring is not followed up with any analysis or action. CUSECS, a totally illegal facility with no Consent to Establish or Operate, has been discharging allegedly “treated” wastewater into the sea. However, records available with the TNPCB indicate that the treated wastewater exceeds permissible limits for a number of parameters in a majority of the samples taken. Another example is the TNPCB's response to VOC monitoring information provided by Shasun and Tantech. According to recently amended Consent Conditions, the two companies were required to monitor for VOCs and ensure that their levels are within USEPA prescribed permissible levels. In the case of Shasun, the company disclosed that 7 out of 8 air samples taken had at least two carcinogens between 4 and 100 times above permissible levels. The DEE, TNPCB, has in his compliance report noted that monitoring was done and that the Consent Conditions pertaining to monitoring and VOC control are “complied” with. In a similar case of Tantech, once again VOC analysis conducted with in the unit reveals that at least 8 out of 14 VOCs analysed exceeded the US EPA prescribed permissible limits some as high as 800 times. Yet the DEE, TNPCB, has in his compliance reported that monitoring was done and that the Consent Conditions pertaining to monitoring and VOC control are “complied” with.
4. **Proclivity to use guesstimates rather than science:** In early 2008, SACEM monitors intercepted 55 drums of hazardous wastes being transported by Shasun Chemicals. The TNPCB was not only uncooperative, but openly hostile to any suggestion that the chemicals being transported are hazardous wastes. Repeating the Company's claim that the consignment was of “aldehydes” and not toxic wastes, the Assistant Environmental Engineer, TNPCB convinced the Police to let the consignment go. The TNPCB did not insist on a laboratory test before releasing the consignment. Subsequent reports of analyses from the IIT and TNPCB confirmed that the consignment was indeed hazardous wastes. In any case, aldehydes refers to an entire class of chemicals and not to any specific chemical.

c) Failure to share information with the community:

The TNPCB has been markedly hostile to community members. Despite the fact that most of the violations that come to the notice of the TNPCB are through complaints by SIPCOT residents, the TNPCB has, till date, not initiated a single meeting with the residents. Nor have they responded to any of the hundreds of complainants in the last three years. Reports and studies that were performed as a result of community

complaints and pressure were sought to be kept hidden, and would not have been available to public if it had not been for the Right to Information Act, 2005.

Over the last three years, TNPCB has taken at least 6 samples from the river Uppanar after complaints from the fishermen of illegal effluent discharge. Results of these samples have not been made available despite repeated requests. Meanwhile, illegal discharges to Uppanar continue.

Environmental Committee set up by the District Administration:

In March 2008, the District Collector of Cuddalore set up a SIPCOT environment committee that included members of the resident communities, citizens, representatives from industries and TNPCB officials. The mandate of this committee was to take quarterly stock of the environmental violations in the SIPCOT area. This committee was specifically set up after the community members expressed their frustrations about inaction on their complaints and repeat violations by the units.

Unfortunately, this Committee too has been rendered ineffective owing to the laxity of TNPCB. Since its first meeting in March 2008, community members in the Committee have requested the latest Consent Conditions and Compliance reports of the units from the TNPCB. These documents would allow for a better understanding of the status of implementation of laws in the units. More than 8 months have passed since this request, and the TNPCB is yet to heed this request.

SACEM Demands:

Based on the analysis of data submitted in the following section of this report and our experience with the regulatory authorities and SIPCOT units so far, we demand:

- a) Immediate legal action should be taken on the units in SIPCOT that are operating without valid licenses and permissions and the directors of these units should be prosecuted for violating the provisions of the Environment Protection Act 1986 and Water and Air Acts.
- b) Investigation by higher authorities in the manner of discharge of duties of the TNPCB DEE and AEE of Cuddalore. Action on the officers if found errant.
- c) All information about the environmental status of SIPCOT Cuddalore including information the raw materials, MSDS and final products of various units in SIPCOT, be made immediately available in the local language at all village offices for inspection by the general public.
- d) A 24 hour hotline for the residents of SIPCOT to register their complaints on environmental issues and a local office of TNPCB in SIPCOT Cuddalore.
- e) Empowerment of the central committee set up by the District Collector to enable them to recommend action on the errant units and non-cooperating officials of the TNPCB.
- f) Training of local police, fire and health officials to help them deal with situations involving pollution and other hazardous incidents.

Details of the units operating in SIPCOT Cuddalore:

1. Arkema Peroxides India Pvt. Ltd:

Date of Commissioning	06.12.1988
Type of Unit	Ultra Red/ Large
Does the unit have a valid Consent to Establish?	No (not required*)
Does the unit have a valid Consent to Operate under Air and Water Acts?	No (the consents expired on -30.09.2008)
Does the unit have a valid Hazwaste Authorisation?	No (the consent expired on 04.04.2007)
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Located at the northern side of the main plant, in between the plant and River Uppanar.
Estimate of the hazardous waste dumped within or outside the unit.	Not Known
Odour(s) commonly noted from the unit	Neem-cake odour
Health effects due to the odour from the unit	Headache
Details of Show-cause notices to the unit between 2006 to 2008	One show-cause notice on 08.10.07 for non compliance of consent conditions under the Air and Water Acts.
Highlights of the latest compliance monitoring report of the unit by TNPCB	<p>Date of the inspection: 14.03.2008 Inspection conducted by: M. Malaiyandi (AEE)</p> <p>Comments: Air Act – AEE observes that the unit is “generally” achieving the SO_x, NO_x, SPM criteria in air. The use of the word “generally” hides the actual number of instances when the criteria were not met. To be more scientific and specific, compliance report could express compliance as a percentage of total instances.</p> <p>Water Act- The AEE notes that according to the results of analysis of effluent sample from the unit between April 2007 and February 2008, TDS & Chloride in all the samples, BOD and COD in 1 sample and TSS in 3 samples exceed the standards prescribed by the Board. The AEE goes on to comment “however treated effluent is meeting Marine Disposal Standards since October 2007.”</p> <p>Hazwaste Authorisation – Two out of eight conditions were noted as “generally complied” with. The others are marked as “complied” indicating that “generally complied” actually means “Not Complied.”</p>
Nature of community complaints against the unit	This unit is a repeat offender for illegal discharge of

	<p>effluents into Uppanar, In at least 9 different occasions, complaints were made to the TNPCB of illegal discharge into the River Uppanar, SACEM records indicate. On one occasion fish kill was reported after the discharge from the unit. Discharge of poisonous chemicals into water bodies is a prosecutable and criminal offence. Fishermen complain of skin itchiness and rashes in the water behind this unit. No investigation has been carried out in any of the 9 cases by the TNPCB.</p> <p>There have also been two instances of industrial accidents and 1 incident of gas leak from the unit in three year period.</p>
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2. Asian Paints

Date of Commissioning	October 1987
Type of Unit	Red-Large
Does the unit have a valid Consent to Establish?	No (not required*)
Does the unit have a valid Consent to Operate under Air and Water Acts?	Not known since the pages are missing from the file
Does the unit have a valid Hazwaste Authorisation?	Yes. (Valid upto 18.08.2011)
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Located on the eastern side of the factory wall on the southern side of the boiler plant of the unit.
Estimate of the hazardous waste dumped within or outside the unit.	Not Known
Odour(s) commonly noted from the unit	Sapota fruit odour
Health effects due to the odour from the unit	Stomach rumbling and headache
Details of Show-cause notices to the unit between 2006 to 2008	Two show cause notices - one for manufacturing quantities above consent order on 11.04.08 and another for violations of consent conditions under the Air and Water Acts on 06.11.07.
Highlights of the latest compliance monitoring report of the unit by TNPCB	<p>Date of the inspection: 11.04.2008 Inspection conducted by: R. Ramasubbu (DEE) and M. Malaiyandi (AEE) Comments: Air Act and Water Act- According to the officials, all consent conditions were adhered to. (No proof was attached to the company's commitment to adhere to VOC emissions standards as per the US EPA standards)</p> <p>General – The officials noted that the unit had applied for an expansion of their production capacity on 14.02.2005, and the TNPCB is yet to give them the permission. During the inspection they noted</p>

	that the unit has already gone into increased production capacity as per their application on 2005 without obtaining permissions from the TNPCB.
Nature of community complaints against the unit	This unit is known for its repeat discharge of effluents illegally into the river Uppanar. There have also been numerous complaints about the air and fugitive emissions from this unit. Residents report a trade mark “sappota” (chikoo) fruit odour from the unit.

3. Aurobindo Pharma Ltd. (previously know as Calac Industries Pvt Ltd)

Date of Commissioning	September 1988
Type of Unit	Ultra Red-Large
Does the unit have a valid Consent to Establish?	No (not required*)
Does the unit have a valid Consent to Operate under Air and Water Acts?	No (both consents expired on -30.09.2008)
Does the unit have a valid Hazwaste Authorisation?	Yes. (Valid till 16.04.2009)
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Located near the main gate
Estimate of the hazardous waste dumped within or outside the unit.	Not Known
Odour(s) commonly noted from the unit	Acid like odour
Health effects due to the odour from the unit	Watering and burning of eyes
Details of Show-cause notices to the unit between 2006 to 2008	Data not available
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 20.03.2008 Inspection conducted by: M. Malaiyandi (AEE) Comments: Air Act – The AEE commented that the unit was “generally” achieving standards on Sox, Nox and SPM. General – The AEE also found that the unit was manufacturing a by-product for which they are yet to obtain Consent from the TNPCB.
Nature of community complaints against the unit	There have been complaints of gas leaks and odourous emissions from this unit.

4. Bayer Material Sciences:

Date of Commissioning	30.06.1988
Type of Unit	Ultra Red-Large
Does the unit have a valid Consent to Establish?	No (Not required*)
Does the unit have a valid Consent to Operate?	Yes

Does the unit have a valid Hazwaste Authorisation?	Yes (Valid till 16.09.2012)
Does the unit require and have a CRZ Clearance?	Yes The unit has not yet obtained a CRZ clearance from the Department of Environment.
Location of the ETP Plant in the unit?	Located on the eastern side of the plant in between the plant and Uppanar
Estimate of the hazardous waste dumped within or outside the unit.	Not Known
Odour(s) commonly noted from the unit	--
Health effects due to the odour from the unit	--
Details of Show-cause notices to the unit between 2006 to 2008	Details Not Available
Highlights of the latest compliance monitoring report of the unit by TNPCB	<p>Date of the inspection: 25.03.2008 Inspection conducted by: M. Malaiyandi (AEE) Comments: Air Act – One out of three conditions not complied with. AEE comments that the “air pollution from the unit is generally within limits”. Water Act- Three out of ten conditions not complied. AEE comments that based on the results of analysis of effluent from the unit between April 2007 to January 2008 reveals that TDS & chloride in 3, TSS in 4, and BOD and COD in 1 each exceeded the standards prescribed by the Board. The AEE also noted “however the unit was achieving the treated effluent standards consistently since October 2007”. Hazwaste Authorisation – One out of 11 conditions was noted as “generally complied with” making is ambiguous to ascertain the compliance status. General – It was recorded that the unit has not obtained a CRZ clearance from the Department of Environment and also the unit is yet to obtain a land reclassification for special industrial and hazardous use by the Department of Town and Country Planning.</p>
Nature of community complaints against the unit	There has been an incident where the unit was caught storing at least 40 drums of hazardous waste illegally on the roadside in the SIPCOT area. The TNPCB later visited the site and immediately declared the waste to be non hazardous without carrying out any scientific analysis.

5. Coastal Packers Pvt. Ltd:

Date of Commissioning	1994
Type of Unit	Green- Small
Does the unit have a valid Consent to Establish?	No
Does the unit have a valid Consent to Operate under the Air and Water Acts?	Yes

Does the unit have a valid Hazwaste Authorisation?	Data Not Available
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	NA
Estimate of the hazardous waste dumped within or outside the unit.	NA
Odour(s) commonly noted from the unit	--
Health effects due to the odour from the unit	--
Details of Show-cause notices to the unit between 2006 to 2008	Data Not Available
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 08.05.2008 Inspection conducted by: Ramasubbu (DEE) Comments: None
Nature of community complaints against the unit	None

6. Diamond Ice and Cold Storage:

Date of Commissioning	09.08.1996
Type of Unit	Green – Small
Does the unit have a valid Consent to Establish?	No
Does the unit have a valid Consent to Operate under the Air and Water Acts?	No
Does the unit have a valid Hazwaste Authorisation?	Not Applicable
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Not Applicable
Estimate of the hazardous waste dumped within or outside the unit.	Not Applicable
Odour(s) commonly noted from the unit	--
Health effects due to the odour from the unit	--
Details of Show-cause notices to the unit between 2006 to 2008	Data Not Available
Highlights of the latest compliance monitoring report of the unit by TNPCB	Data Not Available
Nature of community complaints against the unit	None

7. G S R Products:

Date of Commissioning	April 2006
Type of Unit	Red – Medium
Does the unit have a valid Consent to Establish?	Yes

Does the unit have a valid Consent to Operate under Air and Water Acts?	No (both consents expired on 30.09.2008)
Does the unit have a valid Hazwaste Authorisation?	Yes (Valid till 02.07.2012)
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Not Known
Estimate of the hazardous waste dumped within or outside the unit.	Not Known
Odour(s) commonly noted from the unit	Furnace Oil Odour
Health effects due to the odour from the unit	Stomach rumbling
Details of Show-cause notices to the unit between 2006 to 2008	Data Not Available
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 17.09.2007 Inspection conducted by: M. Malaiyandi (AEE) Comments: Air Act – The official observed that the “ air quality parameter was generally within the limits”. Water Act- Result of analysis of effluent between April to June 2007 revealed that TSS was twice above the standards prescribed by the Board.
Nature of community complaints against the unit	Hazardous air emissions are reported often from this unit. There has been an incident of illegal effluent discharge on land which injured one of the workers from the unit. Moreover the unit had also been found in violation of the Supreme Court order by not providing the details of its hazwaste on the entrance of the unit. Community is not aware of any action taken on this unit for its violations.

8. Kumar Chemical Corporation:

Date of Commissioning	April 1988
Type of Unit	Red – Small
Does the unit have a valid Consent to Establish?	No (Not required*)
Does the unit have a valid Consent to Operate under Air and Water Acts?	Yes
Does the unit have a valid Hazwaste Authorisation?	Data not available
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Information not available
Estimate of the hazardous waste dumped within or outside the unit.	Information not available
Odour(s) commonly noted from the unit	--
Health effects due to the odour from the unit	--

Details of Show-cause notices to the unit between 2006 to 2008	Data Not Available
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 08.05.2008 Inspection conducted by: Ramasubbu (DEE) Comments: None
Nature of community complaints against the unit	None

9. Loyal Super Fabrics:

Date of Commissioning	01.02.1992
Type of Unit	Red – Large
Does the unit have a valid Consent to Establish?	No (not required*)
Does the unit have a valid Consent to Operate under the Air and Water Acts?	No (both consents expired on 30.09.2008)
Does the unit have a valid Hazwaste Authorisation?	Yes (Valid till 13.08.2012)
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Located between the east side of the main plant and northern side of the boiler.
Estimate of the hazardous waste dumped within or outside the unit.	About 75 tons of waste is dumped outside the unit near the ice factory. The waste is dumped under an open walled roofed structure.
Odour(s) commonly noted from the unit	Dye or burnt dye odour
Health effects due to the odour from the unit	Headache
Details of Show-cause notices to the unit between 2006 to 2008	Two show cause notices – one for expansion without consent on 04.04.06 and closure order in the same matter on 20.07.06 and another for violation of water act on 18.02.08
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 04.07.2008 Inspection conducted by: M. Malaiyandi (AEE) Comments: None General – The unit was served a closure notice in July 2006 for expanding its capacity without valid permissions. It was after the “assurances” by the unit was this closure notice suspended for two months from August till October 2006. And finally on 6 th October 2006 the changes were made in the original application dated 11.05.2001 for expanded capacity and the factory has been operation since then.
Nature of community complaints against the unit	There have been numerous complaints of soot, smoke and noxious emissions from the unit by the residents of SIPCOT. The unit has also dumped a large amount of hazardous waste in its neighbouring site and has been caught discharging its effluents illegally into the Uppanar. Industrial accidents have also been reported from the unit.

10. Morgan Industries Ltd.

Date of Commissioning	July 1992
Type of Unit	Red -Large
Does the unit have a valid Consent to Establish?	No (not required*)
Does the unit have a valid Consent to Operate under the Air and Water Acts?	No (both consents expired on 31.03.2008)
Does the unit have a valid Hazwaste Authorisation?	Data Not Available
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Data Not Available
Estimate of the hazardous waste dumped within or outside the unit.	Data Not Available
Odour(s) commonly noted from the unit	--
Health effects due to the odour from the unit	--
Details of Show-cause notices to the unit between 2006 to 2008	Show cause and closure orders for operation without valid consents dated 06.04.06 and 01.09.06 respectively
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 04.03.2008 Inspection conducted by: M. Malaiyandi (AEE) Comments: Air Act – 1 consent “generally” complied with Water Act- 1 out of 3 conditions “generally” complied with
Nature of community complaints against the unit	None

11. Morgan Propack Ltd.

Date of Commissioning	1992
Type of Unit	Orange - Small
Does the unit have a valid Consent to Establish?	No (not required*)
Does the unit have a valid Consent to Operate under the Air and Water Acts?	Yes
Does the unit have a valid Hazwaste Authorisation?	Data Not Available
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Data Not Available
Estimate of the hazardous waste dumped within or outside the unit.	Data Not Available
Odour(s) commonly noted from the unit	--
Health effects due to the odour from the unit	--

Details of Show-cause notices to the unit between 2006 to 2008	Data Not Available
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 04.03.2008 Inspection conducted by: M.Malaiyandi (AEE) Comments: Air Act – One out of 3 conditions “generally” complied with. Other conditions complied as per the report, thus implying that generally complied would mean not complied. Water Act- One out of 3 conditions “generally” complied with
Nature of community complaints against the unit	None

12. Pioneer Jellice Ltd:

Date of Commissioning	July 1993
Type of Unit	Ultra Red – Large
Does the unit have a valid Consent to Establish?	Yes (one Consent for expansion was obtained post facto after five storeys of the new plant was already constructed and was challenged by the communities through a court case).
Does the unit have a valid Consent to Operate under the Air and Water Acts?	No (both consents expired on 30.09.2008)
Does the unit have a valid Hazwaste Authorisation?	No
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Both the plants are on the eastern side of the new Jellice units. ETP I is on the northern side of the company main road and ETP II is located on the southern side of the company main road.
Estimate of the hazardous waste dumped within or outside the unit.	About 10 tons of waste has been packed in gunny bags and dumped around in open pits near the ETP plant II. Some of the waste is also stored under a roof near the ETP plant II.
Odour(s) commonly noted from the unit	Rotten dead body, rotten eggs odour and roasted powder odour
Health effects due to the odour from the unit	Vomiting, giddiness and headache
Details of Show-cause notices to the unit between 2006 to 2008	Two show cause notices for non compliance of consent conditions on 03.09.07 and 14.4.2008
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 14.04.2008 Inspection conducted by: M. Malaiyandi (AEE) Comments: Air Act – 5 special conditions and 2 general conditions violated. Water Act- Result of Analysis of the effluent samples between April 2007 to February 2008 had BOD and COD in 1, Ammonical Nitrogen in 6 and Sulphides in 4 samples exceed the standards

	<p>prescribed by the Board.</p> <p>General – A show-cause notice was issued on the same day for the consent conditions violations of the unit under the Air and Water Acts.</p>
Nature of community complaints against the unit	<p>The community not only consider this units as a repeat offender but also one of the most polluting industry in the region. There have been repeated complaints of illegal discharges into the Uppanar from the unit and on one occasions the TNPCB officials have found and broken illegal pipeline from the unit that releases the effluent into the Uppanar. Yet this has not deterred the unit from continuing with this illegality.</p> <p>The community has also filed several complaints about the air emissions from the unit and the soot emissions from the boiler. Any action by the authorities to regulate these is yet to be taken by the TNPCB.</p> <p>The community has also caught the unit red handed on at least two occasions for dumping its hazardous waste out in open within its premises.</p>

13. Pondicherry Alum & Chemicals Ltd.

Date of Commissioning	October 2004
Type of Unit	Red – Small
Does the unit have a valid Consent to Establish?	Yes
Does the unit have a valid Consent to Operate under the Air and Water Acts?	No (both consents expired on 31.12.2007)
Does the unit have a valid Hazwaste Authorisation?	Data Not Available
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Data Not Available
Estimate of the hazardous waste dumped within or outside the unit.	Data Not Available
Odour(s) commonly noted from the unit	Acid odour
Health effects due to the odour from the unit	Skin burning and watering of eyes
Details of Show-cause notices to the unit between 2006 to 2008	Show cause under the Air and Water Act dated __.01.08
Highlights of the latest compliance monitoring report of the unit by TNPCB	<p>Date of the inspection: 12.06.2007</p> <p>Inspection conducted by: Ramasubbu and Malaiyandi (DEE and AEE)</p> <p>Comments:</p> <p>Air Act – 2 out of 3 conditions not complied with</p> <p>Water Act- 1 out of 4 conditions not complied with</p> <p>General – Even though the show-cause notice was</p>

	served in January 2008, The unit has not yet responded and no further action is taken by the TNPCB in this matter.
Nature of community complaints against the unit	There have been complaints about the illegal discharge of effluents on land and dumping of hazardous waste in open by this unit.

14. Pandian Chemicals

Date of Commissioning	September 2005
Type of Unit	Red – Large
Does the unit have a valid Consent to Establish?	Yes
Does the unit have a valid Consent to Operate under Air and Water Acts?	No (both consents expired on 30.09.2008)
Does the unit have a valid Hazwaste Authorisation?	Yes (valid till 17.04.2012)
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Located on the south side of the main plant on the western side of the boiler.
Estimate of the hazardous waste dumped within or outside the unit.	Data Not Available
Odour(s) commonly noted from the unit	Sulphur type of odour
Health effects due to the odour from the unit	Eye burning
Details of Show-cause notices to the unit between 2006 to 2008	Data Not Available
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 30.09.2007 Inspection conducted by: Ramasubbu and M. Malaiyandi (DEE and AEE) Comments: Air Act – According to the officials “the AAQ survey on 25.08.2006 was generally within the tolerance limits.” Hazwaste Authorisation - The officials commented that the unit did not comply with its hazwaste authorisations.
Nature of community complaints against the unit	Complaints from this unit are generally of air emissions and gas leaks. The unit has also been on one occasion caught burning its hazardous waste in open within its premises. The unit was once also found to be in violation of the Supreme Court order for not displaying its hazwaste detail at the entrance of its facility. Community is not aware of any action taken on the unit is any of the complaints made so far.

15. Shasun Chemicals & Drugs Ltd.

Date of Commissioning	1991
Type of Unit	Ultra Red – Large
Does the unit have a valid Consent to Establish?	No (not required*)
Does the unit have a valid Consent to Operate under the Air and Water Acts?	No (both consents expired on 30.09.2008)
Does the unit have a valid Hazwaste Authorisation?	Yes (Valid till 10.06.2009)
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Located between the east side of the lab and the north side of the recovery plant
Estimate of the hazardous waste dumped within or outside the unit.	Approximately 4000 tons of hazardous waste is dumped in the open space within its premises.
Odour(s) commonly noted from the unit	Pesticide and rotten fruit odour
Health effects due to the odour from the unit	Headache and vomiting
Details of Show-cause notices to the unit between 2006 to 2008	3 show cause notices – one on the hazardous waste inside the premises dt. 10.09.07, another on illegal transport of hazwaste dt. 17.04.08 and one on violation of consent conditions dt. 21.04.08.
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 15.04.2008 Inspection conducted by: Ramsubbu (DEE) Comments: Compliance conditions violations were noticed during the inspection and a show cause notice was issued on the same day. Surprisingly, about 10 days prior to this inspection by the DEE, the AEE, M. Malaiyandi had inspected the unit and reported that all conditions were complied with by the unit and recommended grant of Renewal of Consent for the unit.
Nature of community complaints against the unit	One of the worst polluter and a repeat offender in the SIPCOT region, the community complaints from this unit mostly revolves around noxious releases and gas leaks from this unit. In 2008 alone there have been at least 36 complaints against the air pollution from the unit. Shasun has also been named as one on the key polluters by the NEERI in its report. In early 2008 the unit was also caught red handed by the community members for transporting at least 55 drums of hazardous waste illegally from its factory. There also have been newspaper reports and complaints from residents outside SIPCOT, in one case from Karnataka, of the unit illegally dumping its hazwaste on private land.

16. SPIC

Date of Commissioning	February 1995
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Type of Unit	Ultra Red- Large
Does the unit have a valid Consent to Establish?	No
Does the unit have a valid Consent to Operate under the Air and Water Acts?	No (both consents expired on 30.06.2007)
Does the unit have a valid Hazwaste Authorisation?	Yes (Valid till 18.03.2012)
Does the unit require and have a CRZ Clearance?	Yes The unit has not yet obtained a CRZ clearance from Department of Environment.
Location of the ETP Plant in the unit?	Located in between company office and CUSECS sump 3. For years the unit used to dump its waste in an illegal landfill on the banks of river Uppanar
Estimate of the hazardous waste dumped within or outside the unit.	About 800 tons of wet mycellium sludge is still lying in an open manner all over the unit.
Odour(s) commonly noted from the unit	Public toilet odour and rotten eggs odour
Health effects due to the odour from the unit	Vomiting, giddiness and headache
Details of Show-cause notices to the unit between 2006 to 2008	High Court Order dt 12.11.2006 in WP No 30990 &30991 pending compliance
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 12.04.2008 Inspection conducted by: M. Malaiyandi (AEE) Comments: Air Act – 8 out of 10 conditions not complied Water Act- 8 out of 11 conditions not complied with and 1 “generally” complied with. Results of analysis of effluents samples taken between April 2007 and February 2008 reveal that BOD & COD in 13, TSS in 7, TDS and Sulphates in 2 and Sulphides in 10 exceeded the standards prescribed by the Board. Hazwaste Authorisation – 1 out of 9 not complied while there are no comments on 5 conditions that makes it difficult to assess the compliance.
Nature of community complaints against the unit	Another key polluter in the SIPCOT area, the unit is known for its suffocating human excreta odour. Community complaints mostly revolve around the air emissions, gas leaks, illegal discharge of effluents and illegal dumping of hazwaste in and outside the unit. On at least two occasions the Eachangadu school children have been affected because of the emissions from this unit. Once an eight-year old girl from the school even fainted due to the odour from the unit. In 2008 alone there have been at least 30 complaints filed against the unit on its various violations. The unit also used to dump its hazardous waste in an open landfill on the banks of the river Uppanar. Due to the High Court order it is believed that the unit has suspended dumping in this place but no scientific analysis of the area has been provided to ascertain the nature and extent of

	contamination.
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17. Southern Pigments and Chemicals (P) Ltd.

Date of Commissioning	December 2005
Type of Unit	Red Small
Does the unit have a valid Consent to Establish?	Yes
Does the unit have a valid Consent to Operate under the Air and Water Acts?	No (both consents expired on 30.06.2008)
Does the unit have a valid Hazwaste Authorisation?	Data Not Available
Does the unit require and have a CRZ Clearance?	Yes The unit is yet to obtain a CRZ clearance from the Department of Environment.
Location of the ETP Plant in the unit?	Data Not Available
Estimate of the hazardous waste dumped within or outside the unit.	Data Not Available
Odour(s) commonly noted from the unit	--
Health effects due to the odour from the unit	--
Details of Show-cause notices to the unit between 2006 to 2008	Data Not Available
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 27.04.2007 Inspection conducted by: Ramsubbu (DEE) Comments: The unit had not obtained a CRZ clearance from the Department of Environment.
Nature of community complaints against the unit	There have been complaints of operations without consent and CRZ violation from this unit.

18. Tagros Chemical India Ltd.

Date of Commissioning	1994 (expansion in 2005)
Type of Unit	Ultra Red – Large
Does the unit have a valid Consent to Establish?	Yes
Does the unit have a valid Consent to Operate under Air and Water Acts?	No (both consents expired on 30.09.2008)
Does the unit have a valid Hazwaste Authorisation?	Yes (Valid till 27.06.2012)
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Located on the eastern side of the dismantling plant in the northern part of the compound
Estimate of the hazardous waste dumped within the unit.	Data Not Available
Odour(s) commonly noted from the unit	Pesticide, sugarcane molasses and hospital type

	odour
Health effects due to the odour from the unit	Headache, eye burning, dizziness and vomiting
Details of Show-cause notices to the unit between 2006 to 2008	Show cause for consent condition violation dated 16.04.08
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 16.04.2008 Inspection conducted by: Ramsubbu (DEE) Comments: Air Act – 4 general and 3 renewal conditions found to be violated by the officials Water Act- 3 general and 2 renewal conditions found to be violated by the officials. General – The unit obtained a post-facto EIA clearance in 2007 for its expansion in 2005.
Nature of community complaints against the unit	One of the repeat offenders and worst polluters, complaints against this unit is mostly on air emissions and gas leaks, illegal discharge of effluents, industrial accidents and operations without valid permissions. There is an ongoing construction of a new building within the premises for which the unit is yet to obtain a consent to establish.

19. Tantech Agro Chemicals

Date of Commissioning	1996
Type of Unit	Ultra Red - Large
Does the unit have a valid Consent to Establish?	No
Does the unit have a valid Consent to Operate under the Air and Water Acts?	No (both consents expired on 31.12.2007)
Does the unit have a valid Hazwaste Authorisation?	Yes (valid till 19.03.2009)
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Located on the southern side of the main plant
Estimate of the hazardous waste dumped within the unit.	Data Not Available
Odour(s) commonly noted from the unit	Mosquito Coil, acid and pesticide odour
Health effects due to the odour from the unit	Suffocation, headache and throat irritation
Details of Show-cause notices to the unit between 2006 to 2008	Show cause issued for consent condition violation on 1.4. 2008
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 23.04.2008 Inspection conducted by: Ramsubbu and M. Malaiyandi (DEE and AEE) Comments: Air Act – None of the 5 consent conditions were complied with Water Act- None of the 12 consent conditions were

	complied with.
Nature of community complaints against the unit	<p>This unit is also one of the main polluters and a repeat offender in SIPCOT. More than 30 complaints of gas leaks and toxic emissions from the unit has been filed. TNPCB had issued closure order for violations from the unit but later suspended the order giving the unit three months time to improve its operations and curb its emissions to avoid community complaints. In this period of three months at least 15 complaints have been filed by the community members on the odourous emissions from the unit.</p> <p>Resident of Eachangadu are worst impacted from the emissions of this unit.</p>

20. TANFAC Industries Ltd. (Aluminum Fluoride Plant)

Date of Commissioning	1985
Type of Unit	Ultra Red – Large
Does the unit have a valid Consent to Establish?	Yes
Does the unit have a valid Consent to Operate under the Air and Water Acts?	No (both consents expired n 30.06.2007)
Does the unit have a valid Hazwaste Authorisation?	Yes (Valid till 07.02.2011)
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Located on the south side of the Cryolite Plant
Estimate of the hazardous waste dumped within or outside the unit.	Huge quantities of waste has been dumped in between the cryolite and northern side of the ETP in an open cement tank. Waste in the form of white powder has been dumped in several places openly.
Odour(s) commonly noted from the unit	Sulphur and Acid odour
Health effects due to the odour from the unit	Throat irritation and suffocations. Some time headache and burning of face.
Details of Show-cause notices to the unit between 2006 to 2008	Data Not Available
Highlights of the latest compliance monitoring report of the unit by TNPCB	<p>Date of the inspection: 12.04.2008 Inspection conducted by: M. Malaiyandi (AEE) Comments: Water Act- 4 conditions out of 8 not complied. Results of analysis of effluent sample taken between April 2007 and February 2008 revealed TDS & chlorides in 11, TSS in 1, Fluoride in 2 and sulphates in 5 samples exceeded the standards prescribed by the Board. Hazwaste Authorisation – 1 out of 14 condition not complied with while 11 conditions “generally” complied with</p>

	General – The official also noted that the unit was manufacturing Sulphuric Acid and Oleum above the quantities specified in the Consent to Operate but also went on to justify this violation by explaining that the quantity is well within the unit's Consent to Establish as per 18.02.2008. The Consent to Establish is not the license that regulates production. The Consent to Operate is the one that does.
Nature of community complaints against the unit	Repeated complaints have been made about this unit on the numerous gas leaks and emissions and the illegal dumping of hazardous waste within its premises. While communities are waiting for action from the authorities, the illegalities of this unit continue.

21. TANFAC Industries Ltd. (Cryolite Plant)

Date of Commissioning	1989
Type of Unit	Ultra Red – Large
Does the unit have a valid Consent to Establish?	Yes
Does the unit have a valid Consent to Operate?	No (both consents expired n 30.06.2007)
Does the unit have a valid Hazwaste Authorisation?	Data Not Available
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Located on the south side of the Cryolite Plant
Estimate of the hazardous waste dumped within or outside the unit.	Huge quantities of waste has been dumped in between the cryolite and northern side of the ETP in an open cement tank. Waste in the form of white powder has been dumped in several places openly.
Odour(s) commonly noted from the unit	Sulphur and Acid odour
Health effects due to the odour from the unit	Throat irritation and suffocations. Some time headache and burning of face.
Details of Show-cause notices to the unit between 2006 to 2008	Data Not Available
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 12.04.2008 Inspection conducted by: M. Malaiyandi (AEE) Comments: Water Act- 2 conditions out of 7 not complied. Results of analysis of effluent sample taken between April 2007 and February 2008 revealed TDS & chlorides in 11, TSS in 1, Fluoride in 2 and sulphates in 5 samples exceeded the standards prescribed by the Board. Hazwaste Authorisation – 1 condition out of 5 not complied while 1 “generally” complied with.
Community complaints against the unit in between 2005-2008	Repeated complaints have been made about this unit on the numerous gas leaks and emissions and

	the illegal dumping of hazardous waste within its premises. While communities are waiting for action from the authorities, the illegalities of this unit continue.
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22. Tagros Chemicals Ltd. (Unit II)

Date of Commissioning	July 2006
Type of Unit	Red – Small
Does the unit have a valid Consent to Establish?	Yes
Does the unit have a valid Consent to Operate under the Air and Water Acts?	Yes
Does the unit have a valid Hazwaste Authorisation?	Data Not Available
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Located on the eastern side of the dismantling plant in the northern part of the compound
Estimate of the hazardous waste dumped within or outside the unit.	Data Not Available
Odour(s) commonly noted from the unit	Pesticide, sugarcane and hospital type odour
Health effects due to the odour from the unit	Headache, eye burning, dizziness and vomiting
Details of Show-cause notices to the unit between 2006 to 2008	Data Not Available
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 21.06.2008 Inspection conducted by: M. Malaiyandi (AEE) Comments: Water Act- 1 condition out of 13 not complied while 5 “generally” complied with.
Nature of community complaints against the unit	One of the repeat offenders and worst polluters, complaints against this unit is mostly on air emissions and gas leaks, illegal discharge of effluents, industrial accidents and operations without valid permissions. There is an ongoing construction of a new building within the premises for which the unit is yet to obtain a consent to establish.

23. Tagros Chemicals Ltd. (Unit III)

Date of Commissioning	April 2005
Type of Unit	Red – Small
Does the unit have a valid Consent to Establish?	Yes
Does the unit have a valid Consent to Operate under Air and Water Acts?	No (both the consents expired on 30.06.2007)

Does the unit have a valid Hazwaste Authorisation?	Data Not Available
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Located on the eastern side of the dismantling plant in the northern part of the compound
Estimate of the hazardous waste dumped within the unit.	Data Not Available
Odour(s) commonly noted from the unit	Pesticide, sugarcane and hospital type odour
Health effects due to the odour from the unit	Headache, eye burning, dizziness and vomiting
Details of Show-cause notices to the unit between 2006 to 2008	Data Not Available
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 27.02.2008 Inspection conducted by: Ramsubbu (DEE) Comments: General – The unit is currently carrying out blending operations. The unit has set up all equipments and proposed to manufacture deltamethrin tablets from this unit.
Nature of community complaints against the unit	One of the repeat offenders and worst polluters, complaints against this unit is mostly on air emissions and gas leaks, illegal discharge of effluents, industrial accidents and operations without valid permissions. There is an ongoing construction of a new building within the premises for which the unit is yet to obtain a consent to establish.

24. Tamil Nadu Pigments (P) Ltd.

Date of Commissioning	April 2005
Type of Unit	Red – Small
Does the unit have a valid Consent to Establish?	No
Does the unit have a valid Consent to Operate under the Air and Water Acts?	No (both consents expired on 30.06.2008)
Does the unit have a valid Hazwaste Authorisation?	Yes (Valid till 05.04.2009)
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Data Not Available
Estimate of the hazardous waste dumped within the unit.	Data Not Available
Odour(s) commonly noted from the unit	--
Health effects due to the odour from the unit	--
Details of Show-cause notices to the unit	Data Not Available

between 2006 to 2008	
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 27.04.2007 Inspection conducted by: Ramsubbu and M. Malaiyandi (DEE and AEE) Comments: Water Act- 2 conditions under the Water Act not complied with
Nature of community complaints against the unit	Community complaints have been on poor housekeeping and air pollution from the unit.

25. Victory Chemicals (P) Ltd.

Date of Commissioning	July 1993
Type of Unit	Red – Medium
Does the unit have a valid Consent to Establish?	No (not required*)
Does the unit have a valid Consent to Operate under Air and Water Acts?	No (both consents expired on 31.03.2008)
Does the unit have a valid Hazwaste Authorisation?	Yes (valid till 06.12.2012)
Does the unit require and have a CRZ Clearance?	Yes The unit is yet to obtain a CRZ clearance from the Department of Environment
Location of the ETP Plant in the unit?	Located at the southern side of the plant.
Estimate of the hazardous waste dumped within the unit.	Approximately 1500 tons of hazardous waste has been either openly stored in the form of bricks inside the unit or stored under a roof on the northern side of the plant within its compound.
Odour(s) commonly noted from the unit	Sulphur odour
Health effects due to the odour from the unit	Eye burning, throat irritation and skin itching
Details of Show-cause notices to the unit between 2006 to 2008	4 show cause notices issued – one for improper storage of hazwaste dt. 21.11.07, two for non compliance of consent condition dt. 20.10.06 and 15.02.08 and one on CRZ violations dt. 14.05.08
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 27.02.2008 Inspection conducted by: Ramsubbu (DEE) Comments: The official remarked that the unit does not have a CRZ clearance from the Department of Environment
Nature of community complaints against the unit	Complaints are mostly on illegal dumping of hazardous waste within and outside its premises, effluent discharge into the river and gas leaks and air emissions.

26. Igloo Ice Factory

Date of Commissioning	May 2007
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Type of Unit	Data Not Available
Does the unit have a valid Consent to Establish?	No
Does the unit have a valid Consent to Operate under Air and Water Acts?	Yes
Does the unit have a valid Hazwaste Authorisation?	Data Not Available
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Data Not Available
Estimate of the hazardous waste dumped within or outside the unit.	Data Not Available
Odour(s) commonly noted from the unit	--
Health effects due to the odour from the unit	--
Details of Show-cause notices to the unit between 2006 to 2008	Data Not Available
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 28.03.2008 Inspection conducted by: M. Malaiyandi (AEE)
Nature of community complaints against the unit	None

27. Clariant Chemicals (India) Ltd. (formerly known as Vanavil Dyes)

Date of Commissioning	12.02.1982
Type of Unit	Data Not Available
Does the unit have a valid Consent to Establish?	Yes
Does the unit have a valid Consent to Operate under Air and Water Acts?	No (both consents expired on 31.12.2007)
Does the unit have a valid Hazwaste Authorisation?	Data Not Available
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Located on the south side of the second plant
Estimate of the hazardous waste dumped within or outside the unit.	Data Not Available. Hazardous waste is dumped in an open area on the eastern side of the ETP plant of the unit.
Odour(s) commonly noted from the unit	--
Health effects due to the odour from the unit	--
Details of Show-cause notices to the unit between 2006 to 2008	Data Not Available
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 11.04.2008 Inspection conducted by: Ramsubbu (DEE) Comments: Air Act – Officials noticed fugitive emissions from the ETP plant in the unit. 1 special and 1 general condition violation under the Air Act. Water Act- 4 special conditions and 1 general

	<p>condition violation under the Water Act. The result of analysis of the effluent sample between April 2007 to February 2008 reveal BOD and Sulphates in 1 and COD and TSS in 3 exceed the standards prescribed by the Board.</p> <p>Hazwaste Authorisation – The official noted that –</p> <p>a) the ETP of the unit was not working properly</p> <p>b) solid waste was dumped in open spaces around the unit</p> <p>c) ETP collection and holding tanks were in open conditions</p> <p>d) there were no bio essay tests conducted</p> <p>e) fuel with greater than 1% sulphur content was being used</p> <p>General – The official recorded that the unit was manufacturing two products and one by-product in violation of the consent order.</p>
Nature of community complaints against the unit	Effluent discharge into the river

28. Kausalya Ice Factory

Date of Commissioning	June 2007
Type of Unit	Orange – Small
Does the unit have a valid Consent to Establish?	No
Does the unit have a valid Consent to Operate under Air and Water Acts?	Yes
Does the unit have a valid Hazwaste Authorisation?	Data Not Available
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Data Not Available
Estimate of the hazardous waste dumped within or outside the unit.	Data Not Available
Odour(s) commonly noted from the unit	--
Health effects due to the odour from the unit	--
Details of Show-cause notices to the unit between 2006 to 2008	Data Not Available
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 28.03.2008 Inspection conducted by: M. Malaiyandi (AEE)
Nature of community complaints against the unit	None

29. MAB Metals

Date of Commissioning	18.03.1993
Type of Unit	Red – Small
Does the unit have a valid Consent to Establish?	No (not required*)
Does the unit have a valid Consent to Operate	Yes

under Air and Water Acts?	
Does the unit have a valid Hazwaste Authorisation?	Data Not Available
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Data Not Available
Estimate of the hazardous waste dumped within the unit.	Data Not Available
Odour(s) commonly noted from the unit	--
Health effects due to the odour from the unit	--
Details of Show-cause notices to the unit between 2006 to 2008	Data Not Available
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 02.01.08 Inspection conducted by: Ramsubbu (DEE)
Nature of community complaints against the unit	None

30. Omicast Precision Products (P) Ltd.

Date of Commissioning	August 1991
Type of Unit	Red – Large
Does the unit have a valid Consent to Establish?	No (not required*)
Does the unit have a valid Consent to Operate under Air and Water Acts?	No (original consent expired on 31.03.1991 and consent for expanded unit expired on 31.03.2008)
Does the unit have a valid Hazwaste Authorisation?	Data Not Available
Does the unit require and have a CRZ Clearance?	No Not required
Location of the ETP Plant in the unit?	Data Not Available
Estimate of the hazardous waste dumped within or outside the unit.	White powder waste is dumped on the eastern side of the unit
Odour(s) commonly noted from the unit	--
Health effects due to the odour from the unit	--
Details of Show-cause notices to the unit between 2006 to 2008	Data Not Available
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 14.03.2008 Inspection conducted by: M. Malaiyandi (AEE) Comments: Air Act – 1 out of 3 conditions not complied with
Nature of community complaints against the unit	Industrial accident from the unit.

31. CUSECS Ltd.

Date of Commissioning	2000
Type of Unit	Data Not Available

Does the unit have a valid Consent to Establish?	No
Does the unit have a valid Consent to Operate under Air and Water Acts?	No
Does the unit have a valid Hazwaste Authorisation?	Data Not Available
Does the unit require and have a CRZ Clearance?	Yes (CRZ clearance obtained post facto in 2005)
Location of the ETP Plant in the unit?	--
Estimate of the hazardous waste dumped within the unit.	--
Odour(s) commonly noted from the unit	Rotten cabbage, dead body odour
Health effects due to the odour from the unit	Giddiness, headache, vomiting
Details of Show-cause notices to the unit between 2006 to 2008	At least 5 show cause notices issued to the company for violations of effluent standards as prescribed by the Board. TNPCB did not pursue the matter after receiving the response by the unit in each case.
Highlights of the latest compliance monitoring report of the unit by TNPCB	Date of the inspection: 12.03.2008 Inspection conducted by: M. Malaiyandi (AEE) Comments: The unit does not have a consent from TNPCB so the inspection was conducted to assess units compliance to the conditions imposed by the Ministry of Environment and Forests in CRZ clearance Water Act- It was observed that the results of analysis of effluent samples taken highlighted that sulphur, total kjeldahl nitrogen and ammonical nitrogen are above limits. No analysis report is being sent to the TNPCB 2 out of 5 special conditions not complied with while one is "generally" complied with. 5 out of 7 general conditions not complied with
Nature of community complaints against the unit	Complaints include the fact that CUSECS continues to operate without the statutory consents under Water and Air Act. There have been numerous occasions where the pipelines of CUSECS have been reported to be broken, effluent has leaked on land and inland ponds and canals. There has also been a discharge into the sea which caused a fish kill.

32. Chemplast Sanmar Ltd. (PVC Division) (Under Construction)

Date of Commissioning	2006
Type of Unit	Ultra Red – Large
Does the unit have a valid Consent to Establish?	Yes
Does the unit have a valid Consent to Operate?	Not required at this point
Does the unit have a valid Hazwaste Authorisation?	Not require at this point

Does the unit require and have a CRZ Clearance?	Yes The unit is yet to obtain CRZ clearance for its desalination plant, the construction of which has already begun.
Location of the ETP Plant in the unit?	--
Estimate of the hazardous waste dumped within the unit.	--
Odour(s) commonly noted from the unit	--
Health effects due to the odour from the unit	--
Details of Show-cause notices to the unit between 2006 to 2008	--
Highlights of the latest compliance monitoring report of the unit by TNPCB	--
Nature of community complaints against the unit	<p>Complaints have highlighted the fact that the unit has commenced constructions without requisite CRZ permissions for its desalination plant.</p> <p>There have also been complaints made about the industrial accidents while construction from the unit.</p> <p>Communities have also complained about the unit's glass waste dump on the banks of Uppanar which could prove fatal for the fishermen. Action on all these complaints is yet to be taken.</p>

33. Chemplast Sanmar Ltd. (Marine Terminal Facility Division) (Under Construction)

Date of Commissioning	2006
Type of Unit	Ultra Red – Large
Does the unit have a valid Consent to Establish?	Yes
Does the unit have a valid Consent to Operate under the Air and Water Acts?	Not required at this point
Does the unit have a valid Hazwaste Authorisation?	Not required at this point
Does the unit require and have a CRZ Clearance?	Yes (Obtained)
Location of the ETP Plant in the unit?	--
Estimate of the hazardous waste dumped within the unit.	--
Odour(s) commonly noted from the unit	--
Health effects due to the odour from the unit	--
Details of Show-cause notices to the unit between 2006 to 2008	--
Highlights of the latest compliance monitoring report of the unit by TNPCB	--
Nature of community complaints against the unit	--

34. SIMA Textile Processing Center Ltd. (Under Construction)

Date of Commissioning	2007
Type of Unit	Ultra Red- Large
Does the unit have a valid Consent to Establish?	Yes
Does the unit have a valid Consent to Operate?	Not required at this point
Does the unit have a valid Hazwaste Authorisation?	Not required at this point
Does the unit require and have a CRZ Clearance?	Data Not Available
Location of the ETP Plant in the unit?	--
Estimate of the hazardous waste dumped within the unit.	--
Odour(s) commonly noted from the unit	--
Health effects due to the odour from the unit	--
Details of Show-cause notices to the unit between 2006 to 2008	--
Highlights of the latest compliance monitoring report of the unit by TNPCB	--
Nature of community complaints against the unit	--

Note:* as per the B.P.No.61, dated 01.11.1993 – those units who have established/ operated before this B.P. No. 61, obtained only one consent, i.e. Consent to Operate, for which Consent to Establish is not required