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No. 10280 / Ind-II/NOC-M-196 Dt. 22-06-15 /
To

All Regional Officers
State Pollution Control Board
Odisha

Sub: Procedural guideline for conducting inspection in connection with grant of Consent to Operate.

Sir,

Please find enclosed herewith the "procedural guideline for conducting inspection in connection with grant of Consent to Operate" prepared by the Board for information and reference of all inspecting officers of the Board. The points contained in the guideline should be scrupulously followed while conducting inspection of the industries and mines in connection with grant of CTO.

Yours faithfully,

Member Secretary

Encl: As above

Memo No. 10281 /Dt. 22-06-15 /

Copy alongwith the enclosures forwarded to All Sr. Env.Engineers/Sr.Env.Scientists/All EEs/All ESs/All DEEs/All DESs/All AESs/All AEEs/Administrative Officer/Sr.Law Officer/Law Officer, S.P.C. Board, Odisha, Bhubaneswar for information & necessary action.

Member Secretary

Encl: As above

PROCEDURAL GUIDELINE FOR CONDUCTING INSPECTION IN CONNECTION WITH GRANT OF CONSENT TO OPERATE.

A programme for inspection of any industry is to be made only if order/instruction from appropriate authority has been obtained in writing. If there is a verbal order, it needs to be recorded in the concerned file.

Preparedness before proceeding for inspection.

- ☞ Prepare the tour programme and get it approved by concerned authority.
- ☞ Go through the concerned file (and CTO order in particular) in detail and have a comprehensive idea on actions/ activities/ monitoring to be carried out during inspection.
- ☞ Prepare notices of inspection and sample collection.
- ☞ Carry photocopies of the latest consent order, latest show cause notice/ directions/ Bank guarantee other statutory clearances or any other important documents.
- ☞ Mobilize Lab. Personnel for stack and/or AAQ Monitoring and effluent sample collection. Check the fitness of stack monitoring kits, high volume samples etc.
- ☞ Carry sufficient thimbles/filter papers/chemical solutions etc. after conditioning in lab. Ensure that the chemical solutions are freshly prepared.
- ☞ Take the assistance of other officials/ staff for inspection/ monitoring if, felt necessary with consent of the concerned authority.
- ☞ In normal circumstances, conduct inspection without prior intimation. In case prior intimation is felt essential, then the intimation should be made with a shortest notice time. In case of surveillance inspection, always maintain confidentiality.
- ☞ Plan the travel and overnight stay.

Activities during inspection.

- ☞ Before entering in to the plant, have a visual look around the plant periphery from outside and assess emission status from the stacks as well as on fugitive emission. Have a look on effluent discharge channel to ascertain any abnormality in the flow and discharge.
- ☞ Serve the notices of inspection to the person in-charge of the Plant/in the helm of the affairs of pollution control matters immediately after entering into the plant. Get acknowledgement of receipt of notices from the concerned person of the industry on the body of office copy (of notices).
- ☞ Take stock of operational status of various process units which are potentially polluting and have relevance to pollution.
- ☞ Based on operational status, decide and plan the details of stack & AAQ Monitoring activities to be conducted. Mobilize the logistics by taking assistance of manpower of the plant and their monitoring equipment, if required. Form teams and assign specific jobs of monitoring to each team with proper instruction.
- ☞ Proceed to the effluent treatment plant (ETP) or any such treatment facilities and verify the operational status. Verify the log book on discharge quantity and inspect the flow measuring device, if any available to confirm it.
- ☞ Verify the log book on ETP operation to ascertain it's operational status on the preceding days/weeks and also ask for any other document, as felt necessary to ascertain it's functioning in the preceding period. Collect grab samples from the inlet, outlet and any other intermediate point(s) of ETP to ascertain the efficacy of ETP and compliance to discharge norms stipulated in the consent order. Procedure circulated by the Central Lab. needs to be followed scrupulously while collecting and preserving the samples.
- ☞ Inspect the key process areas which have the potential of air emission, fugitive emission or effluent generation or solid waste generation.
- ☞ Verify the status of process/operations from the control room to ascertain the rate of production and collect information relevant for the purpose of monitoring/ sampling.

- ☞ Visit the vital process areas to verify if there is any fugitive emission or leakage/discharge of any effluent taking place bypassing the ETP.
- ☞ Evidence of discharge of process effluent, if any, found to be taking place, then the point of final discharge needs to be verified and sample of such discharge needs to be collected as per the procedure prescribed by Central Lab.
- ☞ Inspect storm water drainage network and collect samples, if discharge of effluent to outside is taking place.
- ☞ Verify the water management aspects to verify the water consumption figures. Water drawal aspects like water meter readings are to be checked for it's correctness in connection with water cess as well as CTO.
- ☞ Move around the solid waste disposal site(s) and verify the compliance status of consent conditions. Verify the log book if dispatch or utilization of waste is taking place.
- ☞ Inspect the areas where the hazardous waste are stored / disposed and verify the compliance status of the conditions stipulated in the authorization.
- ☞ Ask for the documents in support of hazardous waste generation, storage, processing and disposal. Obtain copies of relevant documents as felt necessary for record in this regard.
- ☞ Collect the operational condition with emission and effluent discharge.
- ☞ Verify the conditions stipulated in the consent order and make specific observations.
- ☞ Verify the status of plantation programme.
- ☞ All the air and water samples so collected during the inspection are to be properly secured and sealed in a manner as prescribed by the Central Laboratory and submitted to the Regional Office Lab/Head Office Lab at the shortest possible time.
- ☞ Get the acknowledgement of the industry's representative on the body of notices intended for sample collection in respect of air / effluent samples so collected.
- ☞ Take photographs for better comprehension and corroboration.

In case of inspection of mines the following specific activities should also be verified in detail;

- ☞ Whether wet drilling/drilling with dust extractor system in place
- ☞ Controlled blasting practice followed or not
- ☞ Dust suppression facilities available for haulage roads, mineral handling plants, mineral stack yard, railway siding and internal mineral transportation roads etc.
- ☞ Verify whether the haulage road/ internal transportation roads are devoid of ruts and potholes and properly graded for prevention of dust emission.
- ☞ In order to assess the adequacy of air pollution control systems

  (ii) Fugitive emission (SPM) monitoring need to be conducted at a distance of 25+ 2m from the sources of pollution in case of iron mines and 500m from the sources of pollution in case of coal mines for SPM,RSPM,SO2, NOx (as per the stipulated conditions of consent order).

  (iii) Ambient air quality monitoring for the parameters such as PM10 and PM2.5 shall also be conducted at suitable locations (locations decided on the basis of condition stipulated in CTO order) for other categories of mine as well as Iron and Coal mines.
- ☞ Verify the top soil and OB management facility
- ☞ Nos. of active and in-active top soil and OB dumps.
- ☞ Stabilization practices.
  - ➢ Coir mats with plantation
  - ➢ Only with plantation
- ☞ Retention wall to prevent the washout during monsoon around top soil and OB dumps.
- ☞ Garland drain terminating with settling pond around the top soil/OB dumps for surface runoff management.
- ☞ Verify whether check dams and catch drains are constructed at the appropriate places of the mine (Preferably natural drainage channels of the mine) for surface runoff management during monsoon.

- ☞ Verify the adequacy of surface runoff management system of entire mining area.
- ☞ Collect the surface runoff water of the mine discharged through the various facilities available to assess the compliance of standards stipulated in consent order.
- ☞ Verify the treatment facilities/management facilities available for mine drainage water/domestic effluent/ workshop effluent/ effluent generated from beneficiation plants etc. and collect the treated wastewater discharge if any for verification of compliance to the stipulated standards.
- ☞ Verify the impact of surface runoff, mining activities on the water bodies, streams, rivers etc. situated in & around the mining area.

Winding-up activities.

- ☞ After completion of the inspection, conduct a brief meeting with the senior level officials and management representative and apprise them of all major deficiencies/ lapses/ non-compliances observed during inspection and suggest remedial measures.
- ☞ Instruct them to take immediate corrective actions without waiting for communication/ direction from the Board and report compliance.

Report Preparation :

- ☞ An inspection report needs to be prepared containing the following:

  1. Date and time of inspection
  2. Constitution of team
  3. Representatives of the industry accompanied/ discussed.
  4. Background of inspection in brief containing status of CTO, show cause notices/directions/restriction, if, any in force, Bank Guarantee conditions pending if any etc.
  5. Production process/facilities granted under CTO, visa-a-vis operational status during inspection.
  6. Name and designation of inspecting officer.

- ☞ Process area wise observations made in respect of air pollution, water pollution, solid waste generation etc. are to be mentioned. Deficiencies/ lapses/non-compliances in respect of pollution control measures leading to issues of pollution, if any, are to be reflected under the respective process area.

- ☞ Description of water/waste water samples, stack emission and AAQ Monitoring etc. collected during inspection are to be made in detail. Attach copies of analysis reports of all the samples collected during inspection.
- ☞ Make a clear cut observation if there was production in excess of consented quantity, emission/ effluent discharge made through any unauthorized outlet (i.e. not granted under CTO) or discharge/emission made in excess of permitted quantity. This is to be reflected in the report as "non-compliance".
- ☞ Analyze and discuss the monitoring results on the context of production load, ETP operational status etc. and draw a conclusion.
- ☞ Detail compliance status on hazardous waste management and specific comments on non-compliance, if any.
- ☞ Target and achievement made on plantation.
- ☞ Selected photographs, which are felt necessary to support the observations.
- ☞ A separate paragraph containing summary of salient observations highlighting the non-compliances and issues leading to problems of environmental pollution needs to be prepared. Specific achievements in respect of environmental management and pollution control are to be highlighted.
- ☞ Report on any other activities to be taken up for further improvement of environment.
- ☞ Point wise compliance status to the direction if issued by the Board.
- ☞ Point wise compliance status on Bank guarantee conditions if imposed by the Board.
- ☞ A paragraph on recommendations containing specific actions required to be taken by the industry to remove the non-compliances / lapses (if any). Actions required to be taken by the Board on the above context as well as on disposal of CTO needs to be made clearly.
- ☞ The inspection report is to be submitted on-line within 72 hrs. after completion of the inspection if there is no Lab. analysis work is involved. In case Lab. analysis work is involved, then the complete report is to be submitted within 72 hrs. from the time of receipt of analysis report from the Lab.
- ☞ The inspection report is to be signed by the all the inspecting officers clearly mentioning their name, designation and the date.