

No.PCB/SEO-CTA-67/Random Inspection/2018/

May 16, 2018

Inspection Notes of C.D.Kumar, SEO, Chitradurga

Name of The Industry visited	M/s Lube Tech Petro Chemicals, No.C-76, KSSIDC, Veerasandra Industrial Estate, Bengaluru 560100
Date of Visit	14.05.2018
Officers Accompanied	S.K.Vasudev, RO
Person Contacted	Syed Aleem, Proprietor

It is a hazardous waste viz used oil & waste oil re-processing unit for which the Board has issued consent under Water Act 1974 and Air Act 1981 and also granted Authorisation under HWM Rules for the period up to 30.06.2022 with conditions. The unit was visited in view of the instructions issued through e-mail letter No.703 dated 04.05.2018 under random inspection of organization identified based on computerized risk assessment. The unit was in partial operation and following are the observations.

- The unit is located in small shed located in designated industrial estate. To a query the Proprietor informed that the plant will be operated intermittently depending on availability of used oil and waste oil.
- The process area, barrel storage area, oil sludge storage areas are not provided with proper impervious flooring and as such spillages of oil on the floor may lead to underground contamination.
- Waste oil containing drums and spent clay filled containers are haphazardly stored in congested manner within the shed posing risk. Scientific and secured facility has not been made for storage of barrels.
- The unit is having small scale treatment facility within the shed for the treatment of trade effluents and the same was not in operation during visit. During discussions the occupier informed that they are operating the same rarely in batch process as the quantity of waste water generation is very less.
- For HC rich emissions from reactors (vacuum system) very smaller diameter chimney provided without any control equipment.
- As per the records made available during visit the unit is disposing the hazardous wastes to M/s Haat Incinerators, Anekal, Bengaluru and details are as follows

Date	Haz Waste	Quantity in Kg.
09.11.2016	Spent clay	1350
20.09.2017	Spent clay	1190
21.09.2017	Spent clay	1190
08.03.2018	Spent clay	290
17.03.2018	Oil sludge	220

- On verification of Pass Book (maintained from Feb 2018) and available manifest lot of discrepancies noticed. Only selective entries are made in the Passbook by the occupiers of industries for handing over used/waste oil.

- As per the manifest the unit has received used oil from M/s BOSCH, Bengaluru on 07.05.2018 & 23.04.2018 (5535lts), from M/s Peenya industrial gases, Hosur on 23.04.2018, from M/s Mantra Design, Bengaluru on 09.04.2018. But no entries are made in the Passbook.
- No details made available regarding transportation of used/waste oil besides not maintained proper records at site.
- The RO was instructed to verify the returns and manifest besides to conduct stack monitoring by following procedure immediately.
- The Occupier was instructed to improve housekeeping and environmental conditions within the premises.

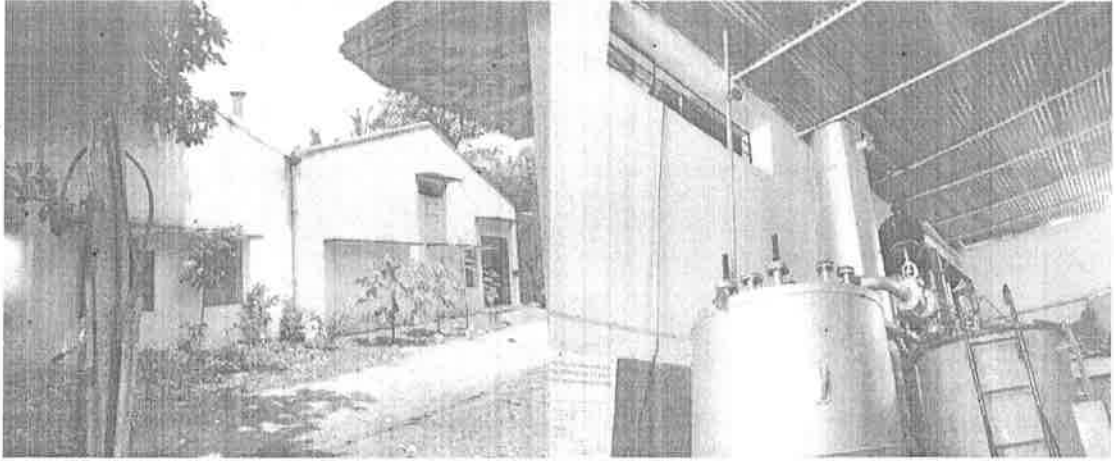
The observations made during visit indicate that the unit is not in full compliance with the conditions stipulated in the consent and authorization. Immediate action is required to improve the process, waste/used oil handling, containers storage, spent clay storage & disposal, besides providing impervious flooring. The Regional officer was instructed to issue notice immediately for the non-compliances besides to verify all the records & manifest system. If the Occupier fails to take immediate action to improve the environmental conditions and to comply with the conditions of consent and authorization action could be initiated as contemplated under HWM Rules 2016.

The photographs taken during visit are enclosed.

Encl. as above

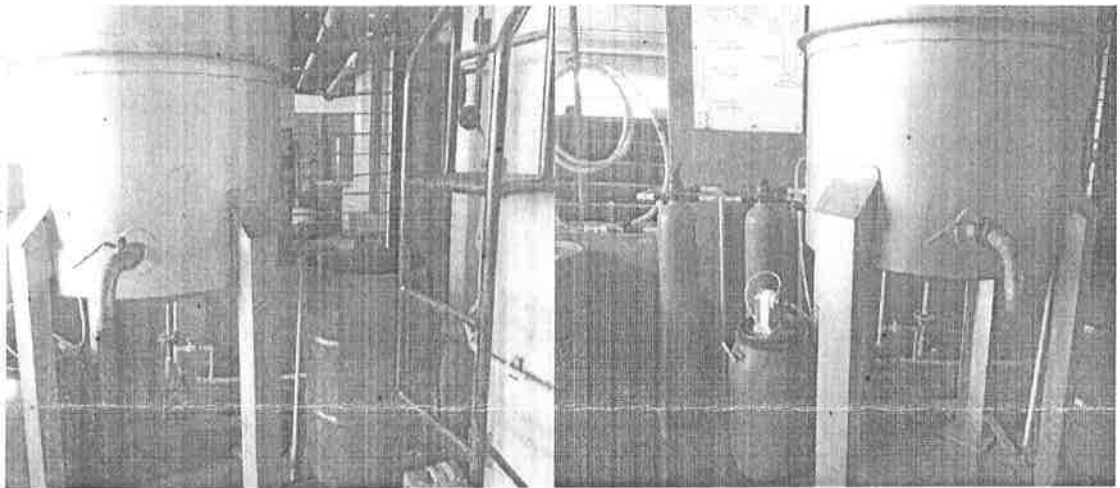


SEO-Chitradurga

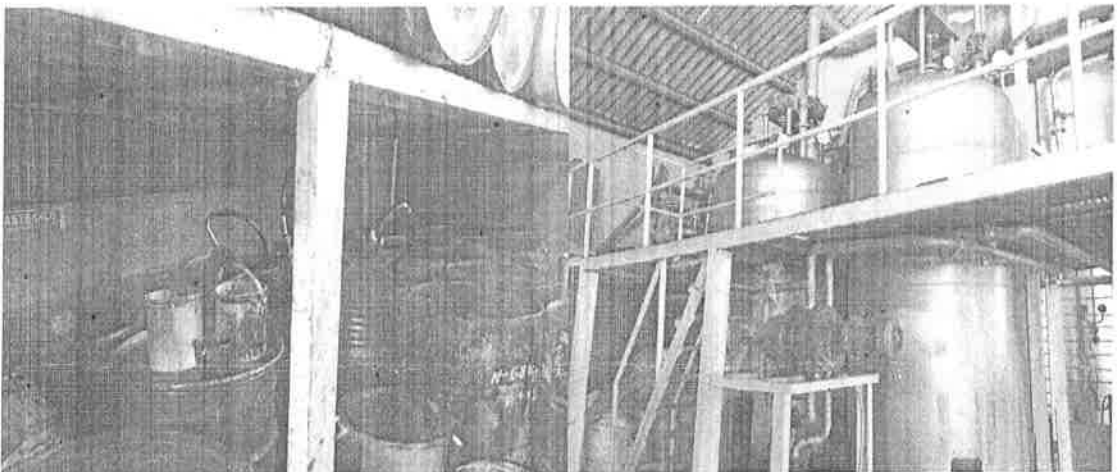


Plant overview ↑

Chimneys ↑



ETP Units ↑



Waste Oil & Spent Clay Storage

Reactors

17 cal-