

To
The Environmental Engineer
Regional Office
A.P. Pollution Control Board
Visakhapatnam.

dated: 7-2-2023
Visakhapatnam

Sir,

Sub:	M/s. Maridi Eco Industries (Andhra) Private Limited, Sy. No. 314, Kapulauppada (V), Bheemunipatnam (M), Visakhapatnam - Reply to the Show cause notice - reg
Ref:	SC Notice No.1252/PCB/RO-VSP/TF/2023 dt 24.01.2023

We, M/s. Maridi Eco Industries (Andhra) Private Limited, Kapulauppada (V), Bheemunipatnam (M), Visakhapatnam submit that we have started the plant in the year 2006 and operating the plant complying the APPCB and CPCB norms.

Sir, though the CAPEX of 3.0 crores is involved to comply with the BMW guidelines for the operation of Common Bio Medical Waste Treatment Facilities , we are the forerunners in modernising the CBMWTF with the cost of 3.0 crores only just to comply with Norms. Sir we have most respect and obligation for the compliance of APPCB CFO standards. **Apart from the CAPEX the operation of new incinerator also involves daily huge running costs and regular high maintenance. Sir, its difficult to comply the emission standards with old technology incinerators operating for 8hrs.** Though there is no compulsion from the APPCB we voluntarily shifted for new technology incinerator, only to comply with the emission regulations.

Sir, with reference to the show cause notice issued we submit the present status of compliance as below:

S.No	Observations during inspection	Status of Compliance										
1	No segregated waste is received at CBMWTF. The facility is collecting unsegregated waste from the HCFs and not informing the Board. Color coding is not followed while collecting and incinerating	We accept that the unsegregated waste is received by us. About 70 to 80 % of hospitals follow segregation. Our BMW collection staff also keep on educating about segregation of BMW as per colour coding. Before the corona pandemic , the segregation used to be about 85-90%.we have conducted awareness programmes at the following hospitals: <table border="1"><thead><tr><th>S.No</th><th>Hospital Address</th></tr></thead><tbody><tr><td>1</td><td>Apollo hospitals</td></tr><tr><td>2</td><td>Quality Care Hospitals</td></tr><tr><td>3</td><td>Seven Hills health care Pvt Ltd</td></tr><tr><td>4</td><td>Medi cover hospital</td></tr></tbody></table>	S.No	Hospital Address	1	Apollo hospitals	2	Quality Care Hospitals	3	Seven Hills health care Pvt Ltd	4	Medi cover hospital
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		<p>We have also addressed letters to the all hospitals , Handing over the unsegregated waste , to segregate the BMW.</p>
2	Mixed waste along with needles, plastic, glassware etc. are fed into primary chamber of incinerator	<p>We will conduct further awareness programmes about the segregation of waste as per the colour coding. sir we at the facility are not segregating the BMW after the pandemic</p>
3	The facility is not storing the BMW properly in separate rooms as per colour code and the waste is observed to be scattered outside the BMW storage rooms. As per CTO conditions, waste has to be handled in closed shed.	<p>Sir we apologise for the same. The before day of inspection is holiday and could not operate the plant, resulted in accumulation. But we submit that we have modernized our plant with the cost of Rs 3 crores and we have automatic feeding , by which only the set input quantity can be feed (we cannot feed more than set input quantity , which is essential to maintain sufficient oxygen for complete combustion to achieve the CPPCB/APPCB emission standards.) We have now processed all the waste. (photographs enclosed)</p>
4	Vehicles transporting BMW are not provided with separate compartments to facilitate loading of BMW as per colour code. The facility is collecting mixed waste without following colour coding.	<p>Sir as explained above due to unsegregated waste by hospitals we could not comply 100 % colour coding. Regarding compartments we submit that colour coded bags themselves distinguish the waste. We submit that hence forth we will bring to the notice of APPCB about the HCFs not following the segregation.</p>
5	A shed is to be constructed over ash collection pit to avoid rain water mixing. Spillages around ash collection pit shall be avoided.	<p>sir the ash pit is covered with RCC slab. During emptying with JCB it would be difficult if shed is provided. However to avoid rain water mixing we have provided roof as submitted in photograph.</p>
6	A very less quantity of needle/sharp storage is observed in the pit	<p>We will bring to the notice of the APPCB regarding the HCEs not submitting PP containers</p>
7	Autoclave temperature during operation is 120.8 0 C against required temperature of 121 0 C	<p>we will ensure the desired temperatures</p>
8	Gravel roads are existing which have to be upgraded to CC roads so that any spillages from the vehicles are also properly diverted to ETP.	<p>We submit that the vehicles are closed ones and the BMW is in bags. The chances of spillages are negligible. But if it happens the waste will be collected & disposed in the incinerator. However we will provide the partitions within 3 months.</p>
9	The facility is located on a hillock slope and hence need garland drain along upstream boundary of the plant to	<p>Sir, we will provide the garland drain around the boundary as directed by you .</p>

	avoid mixing of rain water with facility waste waster	
10.	The online emission systems are connected to APPCB website. Web camera not provided.	As per CPCB and APPCB directions we have provided online emission monitoring systems and connected to APPCB and CPCB websites.
11	The facility not invited the representatives of DM&HO, APNA & IMA & representatives of HCFs to visit the facility in the month of January, 2021.	we have recently addressed letters dt 30.01.2023 to DMHO, APNA & IMA inviting them for visit of our plant at their convenient dates.(enclosed). However The APPCB addressed letter to APNA ,DMHO and private hospitals to visit the plant on 06.02.2023 they are visited at our plant (photographs enclosed)
12	Housekeeping is not satisfactorily. Waste is stored improperly. A closed shed is to be constructed for carrying out all the operations. Recyclable plastic waste is stored openly.	We improved the housekeeping. Photographs enclosed. The waste store room, incinerator autoclave, shredder all are provided in the shed.
13	The facility is carrying out vehicle washing openly on a ramp and the wash water is diverted to drain leading to inlet of ETP. Vehicle washing also shall be carried out under a closed shed.	We submit that we don't generate any process waste water, as our plant is dry technology. We generate vehicle washings. We request you to drop the direction as the shed is not required.
14	Not provided a closed pipeline system for carrying the effluent from the generation point to the ETP in order to avoid the mixing with rainwater. During rains, there is possibility of rain water mixing with the floor washings and vehicle washings.	We will provide the pipes for conveyance of vehicle wash water within 3 months.
15	The website of the facility is www.maridivizag.in , which is not functional. Website is not updated regularly with annual reports, waste collection and disposal details.	We accept that our website is not functional. We will soon take steps to revive the website.
16	As per APPCB website data, the facility uploaded the compliance status dt: 31.03.2021 only. No further uploading of half yearly compliance status reports. As per CTO order, facility has to submit compliance of CTO conditions every month to the Board along with data of BMW collected and disposed in the prescribed format.	Sir, We have been submitting the physical copies at your office (enclosed). Now we have also uploaded our compliance in the website.

17	The unit has not provided separate flow meters for process & domestic consumption. Bore well water meter is also not functional.	Sir we will provide flow meters within one month as directed by you.
18	Stack monitoring was conducted on 18.01.2023 and as per the analysis reports, the values of all parameters are within Board standards except particulate matter i.e., 58.2 mg/Nm ³ which is exceeding Board standard of 50 mg/Nm ³	With the adoption of new technology we are complying with all the critical parameters like combustion efficiency, more than 99%, temperature in primary and secondary chambers and two seconds time in secondary chamber residence time.
		We are also meeting HCL and NO ₂ standards. To meet the particulate matter emission standards we are regularly maintaining the bag filters. After the inspection we have identified 2 Ceramic candles and replaced the candles.
19	In the ETP, the facility has provided bypass arrangement of waste water from equalization tank to discharge on land.	The bye pass arrangement is only for cleaning of tanks and during heavy rains and during maintenance works. We are using dry technology which will not generate any process waste water. The waste water is only from cleaning of vehicles we are treating the waste water in the ETP.
20	The facility has not provided dedicated room for shredder. Occupational safety of workers is to be improved. Workers are not given gum shoes, gloves and glass etc., while handling the wastes and during the operation of incinerator.	We issue gum boots and rubber gloves to the workmen. We accept that they might not have wore gumboots. We ensure that they wore both the gumboots and gloves compulsorily
21	Boards are provided at the main gate, but with no data	We have provided the CFO details at the main gate. Sir we will provide the updated data. Within one week time



M/s Maridi Eco Industries (Andhra) Pvt Ltd

M.V. Viswanatha Rao
Authorised Signature

Visakhapatnam

1. Waste Storage Rooms (s no: III).



2. ASH Pit (s no V).

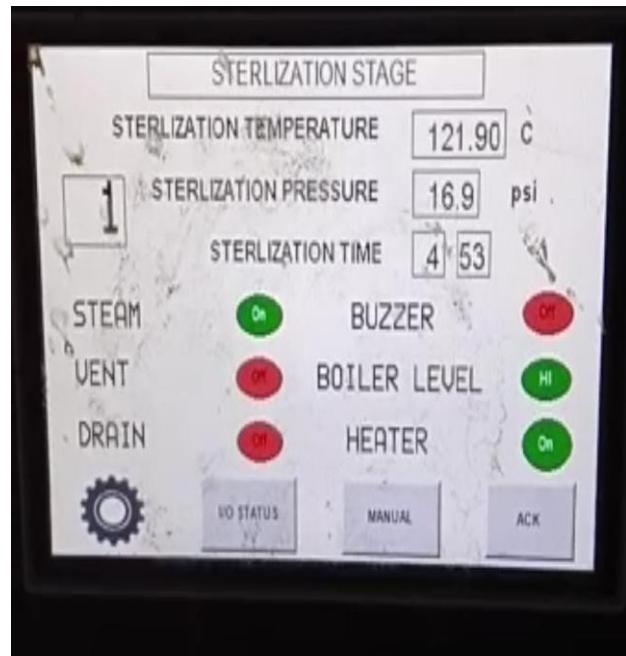








4. AUTO Clave



5. ETP





Magelis

