7.0 ADDITIONAL STUDIES

This chapter describes the additional studies like risk assessment & disaster management plan, Socio-economic development activities and public consultation.

7.1 Risk Assessment and Disaster Management Plan

Hazard analysis involves the identification and quantification of the various hazards (unsafe conditions) that exist in the proposed project. On the other hand, risk analysis deals with the identification and quantification of risks, the plant equipment and personnel are exposed to, due to accidents resulting from the hazards present in the plant.

Risk analysis follows an extensive hazard analysis. It involves the identification and assessment of risks the neighboring populations are exposed to as a result of hazards present. This requires a thorough knowledge of failure probability, credible accident scenario, vulnerability of populations etc.

In the sections below, the identification of various hazards, probable risks in the Sulphonation plant, maximum credible accident analysis, consequence analysis are addressed which gives a broad identification of risks involved in the plant. Based on the risk estimation for fuel and chemical storage, Disaster Management Plan (DMP) has also been presented.

7.2 Approach to the Study

Risk involves the occurrence or potential occurrence of some accidents consisting of an event or sequence of events. The risk assessment study covers the following:

- Identification of potential hazard areas;
- Identification of representative failure cases;
- Visualization of the resulting scenarios in terms of fire (thermal radiation) and explosion;
- Assessment of the overall damage potential of the identified hazardous events and the impact zones from the accidental scenarios;
- Assessment of the overall suitability of the site from hazard minimization and disaster mitigation point of view;
- Furnishing specific recommendations on the minimization of the worst accident possibilities; and
- Preparation of broad DMP, On-site and Off-site Emergency Plan, which includes occupational Health and Safety Plan.

7.3 Hazard Identification

Identification and quantification of hazards in the sulphonation plant is of primary significance in the risk analysis, quantification and cost effective control of accidents. A classical definition of hazard states that hazard is in fact the characteristic of system/plant/process that presents potential for an accident.

Hence, all the components of a system/plant/process need to be thoroughly examined to assess their potential for initiating or propagating an unplanned event/sequence of events, which can be termed as an accident. The following two methods for hazard identification have been employed in the study:

- Identification of major hazardous units based on Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 of Government of India (GOI Rules, 1989); as amended in 2000; and
- Identification of hazardous units and segments of plants and storage units based on relative ranking technique, viz. Fire-Explosion and Toxicity Index (FE&TI).

7.3.1 Classification of Major Hazardous Units

Hazardous substances may be classified into three main classes namely Flammable substances, unstable substances and toxic substances. The ratings for a large number of chemicals based on flammability, reactivity and toxicity have been given in NFPA Codes 49 and 345-M. The storage of the hazardous substance in the proposed project is given in Table 7.1.

**TABLE - 7.1**  
CATEGORY-WISE SCHEDULE OF STORAGE TANKS

<table>
<thead>
<tr>
<th>Sr. No</th>
<th>Product</th>
<th>No of Tanks</th>
<th>Classification</th>
<th>Design Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>HSD</td>
<td>1</td>
<td>Flammable</td>
<td>10 KL</td>
</tr>
<tr>
<td>2</td>
<td>H₂SO₄</td>
<td>1</td>
<td>Corrosive</td>
<td>150 MT</td>
</tr>
</tbody>
</table>

Hazardous characteristics of the major flammable materials employed in the proposed project are listed in Table 7.2.

**TABLE - 7.2**  
PROPERTIES OF STORAGE FUELS

<table>
<thead>
<tr>
<th>Chemical</th>
<th>Codes/Label</th>
<th>TLV</th>
<th>FBP</th>
<th>MP</th>
<th>FP</th>
<th>UEL</th>
<th>LEL</th>
</tr>
</thead>
<tbody>
<tr>
<td>HSD</td>
<td>Flammable liquid</td>
<td>5 mg/m³</td>
<td>400</td>
<td>338</td>
<td>32-96</td>
<td>7.5</td>
<td>0.6</td>
</tr>
</tbody>
</table>

TLV : Threshold Limit Value  
FBP : Final Boiling Point  
MP : Melting Point  
FP : Flash Point  
UEL : Upper Explosive Limit  
LEL : Lower Explosive Limit

7.3.2 Identification of Major Hazard Installations Based on GOI Rules, 1989

Following the accidents in the chemical industry in India over a few decades, a specific legislation covering major hazard activities has been enforced by Govt. of India in 1989 in conjunction with Environment Protection Act, 1986. This is referred here as GOI rules 1989. For the purpose of identifying major hazard installations the rules employ certain criteria based on toxic, flammable and explosive properties of chemicals.

A systematic analysis of the fuels/chemicals and their quantities of storage has been carried out, to determine threshold quantities as notified by GOI Rules, 1989 and the applicable rules are identified. Applicability of storage rules is summarized in Table 7.3.

**TABLE - 7.3**  
APPLICABILITY OF GOI RULES TO FUEL STORAGE

<table>
<thead>
<tr>
<th>Sr. No</th>
<th>Chemical / Fuel</th>
<th>Listed in Schedule</th>
<th>Total Quantity</th>
<th>Threshold Quantity (T) for Application of Rules</th>
</tr>
</thead>
</table>
| 1      | HSD             | 3 (1)              | 10 KL          | 5, 7-9, 13-15: 10 KL  
|        |                 |                    |                | 25 MT  
|        |                 |                    |                | 200 MT |
7.4 **Hazard Assessment and Evaluation**

7.4.1 **Methodology**

An assessment of the conceptual design is conducted for the purpose of identifying and examining hazards related to feed stock materials, major process components, utility and support systems, environmental factors, proposed operations, facilities, and safeguards.

7.4.2 **Preliminary Hazard Analysis (PHA)**

A preliminary hazard analysis is carried out initially to identify the major hazards associated with storages and the processes of the plant. This is followed by consequence analysis to quantify these hazards; those are not complex or hazardous. Hence, no major hazards with potential for any emergency situation exist in the plant. The preliminary hazard related to the proposed plant in general is given in Table - 7.4. The preliminary hazard related to the Sulphonation plant process and storage tanks are given in Table - 7.5 and Table - 7.6 respectively.

### TABLE - 7.4

<table>
<thead>
<tr>
<th>PHA Category</th>
<th>Description of Plausible Hazard</th>
<th>Recommendation</th>
<th>Provision</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Factors</td>
<td>If there is any leakage and eventuality of source of ignition.</td>
<td>---</td>
<td>✓ All electrical fittings and cables will be provided as per the specified standards. All motor starters will be flame proof.</td>
</tr>
<tr>
<td></td>
<td>Highly inflammable nature of the chemicals may cause fire hazard in the storage facility.</td>
<td></td>
<td>✓ Fire extinguisher of small size and big size will be provided at all potential fire hazard places. In addition to the above, fire hydrant network will also provided.</td>
</tr>
</tbody>
</table>

### TABLE - 7.5

<table>
<thead>
<tr>
<th>PHA Category</th>
<th>Description of Plausible Hazard</th>
<th>Recommendation</th>
<th>Provision</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operational Factors</td>
<td>If there is any leakage in the dust and eventuality of source of emission SO₂.</td>
<td>Periodical check up of the wear and tear of the ducts and mechanical, electrical and instrumentation equipments.</td>
<td>✓ If any sudden fall in suction draft to the Sulphonator plant main blower, trip interlock arrangement will stop the process.</td>
</tr>
<tr>
<td></td>
<td><strong>Sulphur Melter:</strong> If there is any backup of corrosive gas into the dryers of the Sulphur Melter during</td>
<td>---</td>
<td>✓ The dual air dryers will be equipped with 11 individual bubble tight control valves. ✓ These valves are designed to ensure to close automatically to prevent back up of corrosive gas.</td>
</tr>
</tbody>
</table>
Additional Studies

### Operational Factors

<table>
<thead>
<tr>
<th>PHA Category</th>
<th>Description of Plausible Hazard</th>
<th>Recommendation</th>
<th>Provision</th>
</tr>
</thead>
<tbody>
<tr>
<td>power failure.</td>
<td>If there is any traces of sulphuric acid</td>
<td>into dryers and to keep moist atmospheric air from reaching the dryers and gas plant.</td>
<td>✓ The brink type inlet mist eliminator will be provided to remove traces of sulphuric acid.</td>
</tr>
</tbody>
</table>

- **Sulphur Burner:**
  
  If there is any air pollution in the Sulphur Burner during conversion of SO₂ and SO₃ in the catalytic converter.
  
  ✓ The Sulphur Burner will be provided with SO₃ absorber system for safe handling of the process gas during startups, shutdowns, upsets and product changeovers.
  
  ✓ The SO₃ absorber system will be provided to absorb the residual gases in the gas plant vessels to eliminate fouling in the Sulphonation reactor during plant shutdown.

- **ESP:**
  
  If there is any source of inefficiency and safety hazard caused due to high-tension insulated ducting in the vessel.
  
  ✓ The transformer/rectifier is mounted on a structural support so that the high voltage bushing inserts directly into the vessel, thereby eliminating the need for high-tension insulated ducting.
  
  ✓ Safety interlocks and manhole locks are provided to ensure safe operation and maintenance of the unit.

### TABLE - 7.6

**PRELIMINARY HAZARD ANALYSIS FOR PROCESS AND STORAGE AREAS**

<table>
<thead>
<tr>
<th>Equipment</th>
<th>Process</th>
<th>Potential Hazard</th>
<th>Provision</th>
</tr>
</thead>
<tbody>
<tr>
<td>Generator</td>
<td>Converts mechanical energy into electrical energy</td>
<td>Mechanical hazards and fire hazards in 1. Lube oil system 2. Cable galleries 3. Short circuits</td>
<td>As above</td>
</tr>
<tr>
<td>Power Transformers</td>
<td>-</td>
<td>Fire and explosion</td>
<td>All electrical fittings and cables are provided as per the specified standards.</td>
</tr>
<tr>
<td>Switch Yard control room</td>
<td>-</td>
<td>Fire in cable galleries and switch</td>
<td>As above</td>
</tr>
</tbody>
</table>
Environmental Impact Assessment for the Proposed Sulphonation Plant (72 TPD of LABSA) by M/s. Power Soaps Private Limited at PIPDIC’s Industrial Estate, Sedarapet, Puducherry

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<table>
<thead>
<tr>
<th>Equipment</th>
<th>Process</th>
<th>Potential Hazard</th>
<th>Provision</th>
</tr>
</thead>
<tbody>
<tr>
<td>HSD Storage</td>
<td>Used as start-up fuel for DG sets, and also will be used for vehicular transportation</td>
<td>Fire &amp; explosion</td>
<td>Leaks detection system will be provided.</td>
</tr>
</tbody>
</table>

7.4.3 **Hazard Identification in Tank Farm**

**Solvents Used**

The solvents used in the Sulphonation Plant are Linear Alkyl Benzene and Sulphuric Acid. The traces of SO\textsubscript{3} from the Sulphonation Process during plant shutdowns, upsets and product change overs will be removed in the Sulphuric Acid absorber column, where it comes into contact with 98% Sulphuric Acid. The Sulphuric acid will be stored in a Tank of Capacity 150 MT. The material safety data sheets are attached as Annexure – XIII.

**Hazard Analysis for Tank Farm**

The materials involved in storage and transfer system have flammable and toxic hazards. Potential failure scenarios involving loss of containment of the materials are as follows:

- Large spillage of the liquid from above-ground storage tanks into the dykes area due to overflow from tank or leakage from tank and connected piping;
- Spillage of liquid during tanker unloading or transfer to process unit; and
- Spillage of the liquid contained in underground tanks from discharge line of transfer pump.

The causes of hazardous liquid release in tank farm, their consequences and safeguards provided are indicated in Table - 7.7.

**TABLE - 7.7**

**HAZARD IDENTIFICATION FOR TANK FARM**

<table>
<thead>
<tr>
<th>Sr. No.</th>
<th>Causes</th>
<th>Consequences</th>
<th>Safeguards</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Leakage from unloading hose</td>
<td>Exposure to toxic chemical</td>
<td>✓ Regular inspection &amp; replacement of chemical hoses.</td>
</tr>
<tr>
<td></td>
<td>Damaged hose</td>
<td>Fire/explosion hazard due to flammable liquid release</td>
<td>✓ Maintenance system for gaskets, flange &amp; hose connections including leak check.</td>
</tr>
<tr>
<td></td>
<td>Improper hose connection</td>
<td>Loss of chemical</td>
<td>✓ Procedure to immobilize tanker before start of unloading.</td>
</tr>
<tr>
<td></td>
<td>Flange gasket leak</td>
<td>Soil/Water contamination</td>
<td>✓ Paved area for tanker unloading with berm for spill containment.</td>
</tr>
<tr>
<td></td>
<td>Movement of tanker during unloading</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Additional Studies

<table>
<thead>
<tr>
<th>Sr. No.</th>
<th>Causes</th>
<th>Consequences</th>
<th>Safeguards</th>
</tr>
</thead>
</table>
| 2       | Leakage from pump seal | Exposure to toxic chemical | ✓ Unloading checklist and display board in local language.  
|         |        | Fire/explosion hazard due to flammable liquid release. | ✓ Use of PPE for unloading.  
|         |        | Loss of chemical |  
|         |        | Soil/water contamination | ✓ Reliable type of mechanical seal for pump.  
|         |        |                     | ✓ Stand-by pump  
|         |        |                     | ✓ Regular maintenance of pumps |
| 3       | Overflow from storage tank by excess filling due to malfunction of tank level instrument. | Exposure to toxic chemical | ✓ Reliable type tank level instrumentation  
|         |        | Fire/explosion hazard due to flammable liquid release | ✓ Multiple level instruments to provide overfill protection for tank  
|         |        | Loss of chemical | ✓ Regular monitoring of tank inventory  
|         |        | Soil/water contamination |  
| 4       | Leakage from flange joint in piping connected to tank bottom | Exposure to toxic chemical | ✓ Remote operated shut off valve in tank bottom connection with push button in control room and safe location outside the dyke.  
|         |        | Fire/explosion hazard due to flammable liquid release |  
|         |        | Loss of chemicals |  
|         |        | Soil/water contamination |  

- **Safety Measures in Storage Facilities**

Risk for storage units depends not on the extent of the consequence, but also on the probability of the failure of the safety measures and provisions provided. The safety measures to be provided in storage facilities in the proposed plant are given below:

<table>
<thead>
<tr>
<th>Substance Stored</th>
<th>Safe Guard</th>
</tr>
</thead>
</table>
| Sulphuric Acid            | ✓ Dyke wall of height - 1.0 m and thickness - 230 mm will be constructed around the storage tank for acid spillage containment.  
|                           | ✓ Also the provision for automatic emergency shower will be provided. |
| High Speed Diesel (HSD)   | Following Fire Fighting measures will be provided:  
|                           | a) DCP (Dry Chemical Powder) Extinguisher;  
|                           | b) AFFF (Aqueous Film Forming Foam) Extinguisher;  
|                           | c) Water cum Foam Monitor; and d) Sand Bucket |
7.4.4 **Fire Explosion and Toxicity Index (FE&TI) Approach**

Fire, Explosion and Toxicity Indexing (FE & TI) is a rapid ranking method for identifying the degree of hazard. The application of FE & TI would help to make a quick assessment of the nature and quantification of the hazard in these areas. However, this does not provide precise information. The degree of hazard potential is identified based on the numerical value of F & EI as per the criteria given below:

<table>
<thead>
<tr>
<th>F &amp; EI Range</th>
<th>Degree of Hazard</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-60</td>
<td>Light</td>
</tr>
<tr>
<td>61-96</td>
<td>Moderate</td>
</tr>
<tr>
<td>97-127</td>
<td>Intermediate</td>
</tr>
<tr>
<td>128-158</td>
<td>Heavy</td>
</tr>
<tr>
<td>159-up</td>
<td>Severe</td>
</tr>
</tbody>
</table>

By comparing the indices F & EI and TI, the unit in question is classified into one of the following three categories established for the purpose **Table - 7.8**.

**TABLE - 7.8**

<table>
<thead>
<tr>
<th>Category</th>
<th>Fire and Explosion Index (F&amp;EI)</th>
<th>Toxicity Index (TI)</th>
</tr>
</thead>
<tbody>
<tr>
<td>I</td>
<td>F&amp;EI &lt; 65</td>
<td>TI &lt; 6</td>
</tr>
<tr>
<td>II</td>
<td>65 &lt; or = F&amp;EI &lt; 95</td>
<td>6 &lt; or = TI &lt; 10</td>
</tr>
<tr>
<td>III</td>
<td>F&amp;EI &gt; or = 95</td>
<td>TI &gt; or = 10</td>
</tr>
</tbody>
</table>

Certain basic minimum preventive and protective measures are recommended for the three hazard categories.

7.4.4.1 **Results of FE and TI for Storage/Process Units**

Fire and Explosion are the likely hazards, which may occur due to the fuel and chemical storage. Hence, Fire and Explosion index has been calculated for implant storage of HSD. Detailed estimates of FE&TI are given in **Table - 7.9**.

**TABLE - 7.9**

<table>
<thead>
<tr>
<th>Sr. No.</th>
<th>Chemical /Fuel</th>
<th>Storage Tank Capacity</th>
<th>F &amp; EI</th>
<th>Category</th>
<th>TI</th>
<th>Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>HSD</td>
<td>10.0 KL</td>
<td>0.9</td>
<td>Light</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>2</td>
<td>H₂SO₄</td>
<td>150 MT</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

7.4.5 **Conclusion**

Results of FE&TI analysis show that the storage of HSD falls in light category of fire and explosion index with a nil toxicity index.
7.4.6 **Maximum Credible Accident Analysis (MCAA)**

Hazardous substances may be released as a result of failures or catastrophes, causing possible damage to the surrounding area. This section deals with the question of how the consequences of the release of such substances and the damage to the surrounding area can be determined by means of models. Major hazards posed by flammable storage can be identified taking recourse to MCA analysis. MCA analysis encompasses certain techniques to identify the hazards and calculate the consequent effects in terms of damage distances of heat radiation, toxic releases, vapour cloud explosion, etc.

A host of probable or potential accidents of the major units in the complex arising due to use, storage and handling of the hazardous materials are examined to establish their credibility. Depending upon the effective hazardous attributes and their impact on the event, the maximum effect on the surrounding environment and the respective damage caused can be assessed. The reason and purpose of consequence analysis are many folds like:

- Part of Risk Assessment;
- Plant Layout/Code Requirements;
- Protection of other plants;
- Protection of the public;
- Emergency Planning; and
- Design Criteria.

The results of consequence analysis are useful for getting information about all known and unknown effects that are of importance when some failure scenario occurs in the plant and also to get information as how to deal with the possible catastrophic events. It also gives the workers in the plant and people living in the vicinity of the area, an understanding of their personal situation.

7.4.6.1 **Damage Criteria**

The fuel storage and unloading at the storage facility may lead to fire and explosion hazards. The damage criteria due to accidental release of any hydrocarbon arise from fire and explosion. The vapours of these fuels are not toxic and hence no effects of toxicity are expected.

Tank fire would occur if the radiation intensity is high on the peripheral surface of the tank leading to increase in internal tank pressure. Pool fire would occur when fuel collected in the dyke due to leakage gets ignited.

### Fire Damage

A flammable liquid in a pool will burn with a large turbulent diffusion flame. This releases heat based on the heat of combustion and the burning rate of the liquid. A part of the heat is radiated while the rest is convected away by rising hot air and combustion products. The radiations can heat the contents of a nearby storage or process unit to above its ignition temperature and thus result in a spread of fire. The radiations can also cause severe burns or fatalities of workers or fire fighters located within a certain distance. Hence, it will be important to know beforehand the damage potential of a flammable liquid pool likely to be created due to leakage or catastrophic failure of a storage or process vessel. This will help to decide the location of other storage/process vessels, decide the type of protective clothing the workers/fire fighters’ need, the duration of time for which they can be in the zone, the fire extinguishing measures needed and the protection methods needed for the nearby
storage/process vessels. Tables - 7.10 tabulates the damage effect on equipment and people due to thermal radiation intensity.

**TABLE - 7.10**

**DAMAGE DUE TO INCIDENT RADIATION INTENSITIES**

<table>
<thead>
<tr>
<th>Sr. No.</th>
<th>Incident Radiation (kW/m²)</th>
<th>Type of Damage Intensity</th>
<th>Damage to Equipment</th>
<th>Damage to People</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>37.5</td>
<td>Damage to process equipment</td>
<td>100% lethality in 1 min. 1% lethality in 10 sec.</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>25.0</td>
<td>Minimum energy required to ignite wood at indefinitely long exposure without a flame</td>
<td>50% Lethality in 1 min. Significant injury in 10 sec.</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>19.0</td>
<td>Maximum thermal radiation intensity allowed on thermally unprotected adjoining equipment</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>12.5</td>
<td>Minimum energy to ignite with a flame; melts plastic tubing</td>
<td>1% lethality in 1 min.</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>4.5</td>
<td>--</td>
<td>Causes pain if duration is longer than 20 sec, however blistering is un-likely (First degree burns)</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>1.6</td>
<td>--</td>
<td>Causes no discomfort on long exposures</td>
<td></td>
</tr>
</tbody>
</table>

*Source: Techniques for Assessing Industrial Hazards by World Bank*

The effect of incident radiation intensity and exposure time on lethality is given in Table-7.11.

**TABLE - 7.11**

**RADIATION EXPOSURE AND LETHALITY**

<table>
<thead>
<tr>
<th>Radiation Intensity (kW/m²)</th>
<th>Exposure Time (seconds)</th>
<th>Lethality (%)</th>
<th>Degree of Burns</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.6</td>
<td>--</td>
<td>0</td>
<td>No Discomfort even after long exposure</td>
</tr>
<tr>
<td>4.5</td>
<td>20</td>
<td>0</td>
<td>1st</td>
</tr>
<tr>
<td>4.5</td>
<td>50</td>
<td>0</td>
<td>1st</td>
</tr>
<tr>
<td>8.0</td>
<td>20</td>
<td>0</td>
<td>1st</td>
</tr>
<tr>
<td>8.0</td>
<td>50</td>
<td>&lt;1</td>
<td>3rd</td>
</tr>
<tr>
<td>8.0</td>
<td>60</td>
<td>&lt;1</td>
<td>3rd</td>
</tr>
<tr>
<td>12.0</td>
<td>20</td>
<td>&lt;1</td>
<td>2nd</td>
</tr>
<tr>
<td>12.0</td>
<td>50</td>
<td>8</td>
<td>3rd</td>
</tr>
<tr>
<td>12.5</td>
<td>--</td>
<td>1</td>
<td>--</td>
</tr>
<tr>
<td>25.0</td>
<td>--</td>
<td>50</td>
<td>--</td>
</tr>
<tr>
<td>37.5</td>
<td>--</td>
<td>100</td>
<td>--</td>
</tr>
</tbody>
</table>

**General Safety Measures for Chemicals Storage & Handling**

Following safety measures for chemicals storage and handling has been confirmed.

- Availability of MSDS (Material Safety Data Sheets) information for all chemicals
- Proper layout of tank farm and other storage areas for chemicals
- Proper segregation of chemicals storage taking into account compatibility Matrix
Environmental Impact Assessment for the Proposed Sulphonation Plant (72 TPD of LABSA) by M/s. Power Soaps Private Limited at PIPDIC’s Industrial Estate, Sedarapet, Puducherry

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- Instrumentation and control system for tanks, Sulphonator etc.
- SO₂ and SO₃ Gas detection and fire protection systems
- Periodic inspection and maintenance system
- Standard operating procedures and check lists
- Training of operation and maintenance personnel
- Safety work permit system
- Electrical hazardous area classification for process units and storage areas
- Incident investigation and implementation of recommendations

7.5 Risk Mitigation Measures to be adopted at Sulphonation Plant

7.5.1 Hazard Control Measures

Apart from the above other mitigation measures are given below:

- Procedures and actions will be well defined and known to all operating personnel's for safe shut down of plant incase of failure of any power, instrumentation, cooling water, air, etc;
- All the vessels and tanks will be provided with temperature indicator, pressure gauge and safety valves as depending upon the process and operating parameters;
- Plant specific HAZOP studies will be carried out using P&IDs (Piping and Instrumentation Diagrams) for identification of hazards during operation considering deviation of operational parameters, their possible cause and consequence and safe guards;
- Interlocks and DCS (Distributed Control System) control will be provided during reaction process;
- All the reactors which will not working at atmospheric temperature will be provided with glass wool lagging to contain the heat;
- All the motors and other rotating equipment machines will be provided with suitable safety guards;
- First Aid Fire extinguishers will also be installed in the plant area;
- Flame arrestors will be provided at all vent lines at solvent tanks;
- Suitable first aid fire extinguishers, such as, DCP (Dry Chemical Powder), CO₂ & foam type will be kept in every plant area at easily approachable spots and in sufficient numbers;
- Fire hydrant points with sufficient length of hose reel will be provided at major emergency spots;
- Emergency Safety shower will be installed at crucial places;
- Sufficient space will be provided for free movement in the plant area;
- Safe distances have been considered in designing of plant lay out;
Regarding all components of the plant proper certificate will be taken. Also testing and inspection will not be compromised before deliveries;

Certificate of structure stability will be taken from competent person;

Insulation of piping will be provided as per requirement;

All elevated structures will be provided with lightning arrestors;

All exposed parts of moving machineries will be provided with suitable guards for personnel safety;

All piping and equipment will be provided with earthing connection and it will be tested regularly;

Safety valves & rupture disc will be provided to prevent over pressurization of vessels and reactors; and

SOP (Standard Operating Procedure) will be available of safe shut-down of plant during any emergency situation.

7.5.2 Spillages, Leakages: Controls

Depending on the leaking rate/source the following actions will be taken;

Isolation/cutting of supply at the leaking point, transfer to some other vessel/equipment, and using protective appliances like hand gloves, helmets, PVC suits etc;

Efforts will be made, to prevent the spread of spillage by neutralization/ earth barriers; and

Outgoing effluents will have to be blocked and taken to effluent collection tanks. It will be taken for treatment.

7.5.3 Risk Reduction Measures

Based on hazard identification, consequence analysis and safety measures to be adopted at the plant, following suggestions for improvement of safety at the plant are emerged.

For risk mitigation/reduction, attempts should be made to either reduce inventories that could get released in the event of loss of containment or failure likelihood’s or both as feasible. Risk analysis identifies the major risk contributors, which enables prioritization of the plant that deserve special attention in terms of inspection and maintenance in particular and over all safety management as a whole.

For the risk reduction at the proposed plant, the following salient suggestions and recommendations are made:

A written process safety information document may be compiled for general use.
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- Personnel especially contractor workers at the plant should be made aware about the hazardous substance stored at the plant and risk associated with them.

- The process design information in the process safety information compilation must include P&IDs/PFDs (Process Flow Diagrams); process chemistry; maximum intended inventory; acceptable upper and lower limits, pressures, flows and compositions and process design and energy balances.

- The document compilation should include an assessment of the hazards presented including (i) toxicity information (ii) permissible exposure limits. (iii) physical data (iv) thermal and chemical stability data (v) reactivity data (vi) corrosivity data (vii) information on process and mechanical design.

- The adequate numbers of heat and smoke detectors may be provided at strategic locations in the plant and indication of detectors/sensors should be provided in main control room.

- Predictive and preventive maintenance schedule should be prepared for equipment, piping, pumps, etc. and thickness survey should be done periodically as per standard practices.

- Safety measures in the form of Do and Don’t Do should be displayed at strategic locations especially in Tamil and English language.

- Safe work practices should be developed to provide for the control of hazards during operation and maintenance.

- The plant should check and ensure that all instruments provided in the plant are in good condition and documented.

- Apart from occupational health centre, first aid boxes including eye wash containers will be placed in all the work areas for immediate first aids.

7.6 Disaster Management Plan

The Disaster Management Plan is aimed to ensure safety of life, protection of environment, protection of installation, restoration of production and salvage operations in this same order of priorities. For effective implementation of the Disaster Management Plan, it should be widely circulated and personnel training should be provided through rehearsals/drills.

To tackle the consequences of a major emergency inside the factory or immediate vicinity of the factory, a Disaster Management Plan has to be formulated and this planned emergency document is called "Disaster Management Plan".

The objective of the Industrial Disaster Management Plan is to make use of the combined resources of the plant and the outside services to achieve the following:

- Effect the rescue and medical treatment of casualties;
- Safeguard other people;
- Minimize damage to property and the environment;
- Initially contain and ultimately bring the incident under control;
- Identify any dead;
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- Provide for the needs of relatives;
- Provide authoritative information to the news media;
- Secure the safe rehabilitation of affected area;
- Preserve relevant records and equipment for the subsequent inquiry into the cause and circumstances of the Emergency.

In effect, it is to optimize operational efficiency to rescue, rehabilitate and render medical help and to restore normalcy.

7.6.1 Emergencies

7.6.1.1 General and Industrial Emergencies

The emergencies that could be envisaged in the plant and tank farm are as follows:

1. A situation of fire at the tank farm of all storages;
2. Slow isolated fires;
3. Fast spreading fires;
4. Structural failures;
5. Contamination of food/water; and

7.6.1.2 Specific Emergencies Anticipated

- **Fire and Explosion**

Fire consequences can be disastrous, since they involve huge quantities of fuel either stored or in dynamic inventory in pipelines or in nearby areas. Toxic releases can affect persons working around. Preliminary hazard Analysis has provided a basis for consequence estimation.

7.6.2 Emergency Organization

The PSPL will set up an Emergency Organization. A senior executive who has control over the affairs of the plant would be heading the Emergency Organization. He would be designated at Site Controller. As per the General Organization chart, Chief Operating Officer will be the Site Controller. General Manager will be designated as the Incident Controller. All the Incident Controllers would be reporting to the Site Controller.

All the department heads, fire & security officer, communication officer and personal manager will be reporting to the Incident Controller. This team will be responsible for controlling the incidence with the personnel under their control. Shift In charge will be the reporting officer, who would bring the incidence to the notice of the Incidence Controller and Site Controller. The team co-ordinates during eventualities and responsible for fire fighting, rescue, rehabilitation, transport and provide essential and support services. For this purposes, security in charge, personnel department, and essential services personnel are engaged. All these personnel will be designated as key personnel.

In each shift, electrical supervisor, electrical fitters, pump house in charge and other maintenance staff will be drafted for emergency operations. In the event of power or communication system failure, some of staff members in the office/plant offices will be drafted and their services would be utilized as messengers for quick passing of communications.
7.6.2.1 Emergency Communication

Whoever notices an emergency situation such as fire, escalation of fire, leakage etc will inform his immediate superior and Emergency Control Center. A place nearer to the security office shall be identified as Emergency Control Center. The person on duty in the Emergency Control Center would appraise the Site Controller. Site Controller verifies the situation from the Incident Controller of that area or the Shift In-charge and takes a decision about an impending On Site Emergency. This would be communicated to all the Incident Controllers, Emergency Co-ordinators. Simultaneously, the emergency warning system would be activated on the instructions of the Site Controller.

7.6.3 Onsite Emergency Preparedness and Response for Accidents

7.6.3.1 Emergency Responsibilities

The responsibilities of the key personnel are appended below:

* Site Controller:
  
  On receiving information about emergency he would rush to Emergency Control Center (ECC) and take charge of ECC and the situation and;

  - Assesses the magnitude of the situation on the advice of incident Controller and decides, whether the affected area needs to be evacuated,
  - Whether personnel who are at assembly points need to be evacuated,
  - Declare Emergency and order for operation of emergency siren,
  - Organizes announcement by public address system about location of emergency,
  - Assesses which areas are likely to be affected, or need to be evacuated or need to be alerted,
  - Maintains a continuous review of possible development and assesses the situation in consultation with Incident Controller and other Key Personnel as to whether shutting down the plant or any section of the plant is required and if evacuation of persons is required,
  - Directs personnel for rescue, rehabilitation, transport, fire, brigade, medical and other designated mutual support systems locally available, for meeting emergencies.
  - Controls evacuation of affected areas, if the situation is likely to go out of control or effects are likely to go beyond the premises of the factory, informs the District Emergency Authority, Police, Hospital and seeks their intervention and help,
  - Informs the Inspector of Factories, Deputy Chief Inspector of Factories, TNPCB and other statutory authorities,
  - Gives a public statement if necessary,
  - Keeps record of chronological events and prepares an investigation report and preserve evidence,
  - On completion of On Site Emergency and restoration of normalcy, declares all clear and orders for all clear warning.

* Incident Controller:

  - Assembles the incident control team.
  - Directs operations within the affected areas with the priorities for safety to personnel minimize damage to the plant, property and environment and minimize the loss of materials.
  - Directs the shutting down and evacuation of plant and areas likely to be adversely affected by the emergency.
- Ensure that key personnel help is sought.
- Provides advice and information to the Fire and Security Officer and the Local Fire Services as and when they arrive.
- Ensures that all non-essential workers/staff of the affected areas evacuated to the appropriate assembly points, and the areas are searched for casualties.
- Has regard to the need for preservation of evidence so as to facilitate any inquiry into the causes and circumstances, which caused or escalated the emergency.
- Co-ordinates with emergency services at the site.
- Provides tools and safety equipment to the team members.
- Keeps in touch with the team and advice them regarding the method of control to be used.
- Keeps the Site Controller of Emergency informed of the progress being made

**Emergency Coordinator - Rescue, Fire Fighting:**

- Helps the incident Controller in containment of the emergency;
- Ensures fire pumps are in operating conditions and instructs pump house operator to be ready for any emergency with standby arrangement;
- Guides the fire fighting crew i.e. firemen, trained plant personnel and security staff;
- Organizes shifting of the fire fighting facilities to the emergency site, if required;
- Takes guidance of the Incident Controller for fire fighting as well as assesses the requirements of outside help;
- Arranges to control the traffic at the gate and the incident area;
- Directs the security staff to the incident site to take part in the emergency operations under his guidance and supervision;
- Evacuates the people in the plant or in the nearby areas as advised by Site Controller;
- Searches for casualties and arranges proper aid for them;
- Assembles search and evacuation team;
- Arranges for safety equipment for the members of this team;
- Decides which paths the evacuated workers should follow;
- Maintains law and order in the area, and if necessary seeks the help of police.

**Emergency Coordinator-Medical, Mutual Aid, Rehabilitation, Transport and Communication:**

- In the event of failure of electric supply and thereby internal telephone, sets up communication point and establishes contact with the ECC;
- Organizes medical treatment to the injured and if necessary will shift the injured to nearby hospitals;
- Mobilizes extra medical help from outside, if necessary;
- Keeps a list of qualified first aid providers of the factory and seek their assistance;
- Maintains first aid and medical emergency requirements;
- Makes sure that all safety equipment is made available to the emergency team;
- Assists Site Controller with necessary data and to coordinate the emergency activities;
- Assists Site Controller in updating emergency plan, organizing mock drills verification of inventory of emergency facilities and furnishing report to Site Controller;
- Maintains liaison with Civil Administration;
- Ensures availability of canteen facilities and maintenance of rehabilitation center;
- He will be in liaison with Site Controller/Incident Controller;
- Ensures transportation facility;
- Ensures availability of necessary cash for rescue/rehabilitation and emergency expenditure;
- Controls rehabilitation of affected areas on discontinuation of emergency;
- Ensures availability of diesel/petrol for transport vehicles engaged in emergency operation.
Emergency Coordinator - Essential Services:

- He would assist Site Controller and Incident Controller.
- Maintains essential services like Diesel Generator, Water, Fire Water, Compressed Air/Instrument Air, power supply for lighting.
- He would plan alternate facilities in the event of power failure, to maintain essential services such as lighting, refrigeration plant etc.
- He would organize separate electrical connections for all utilities and emergency services so that in the event of emergency or fires, essential services and utilities are not affected.
- Gives necessary instructions regarding emergency electrical supply, isolation of certain sections etc. to shift in-charge and electricians.
- Ensures availability of adequate quantities of protective equipment and other emergency materials, spares etc.

General Responsibilities of Employees during an Emergency:

During an emergency, it becomes more enhanced and pronounced when an emergency warning is raised, the workers if they are in-charge of process equipment should adopt safe and emergency shut down and attend any prescribed duty as essential employee. If no such responsibility is assigned, he should adopt a safe course to assembly point and await instructions. He should not resort to spread panic. On the other hand, he must assist emergency personnel towards objectives of DMP.

7.6.3.2 Emergency Facilities

Emergency Control Center (ECC):

For the time being, Office Block or a place nearer to the security office is identified as Emergency Control Center. It would have external Telephone, Fax, and Telex facility. All the Site Controller/ Incident Controller Officers, Senior Personnel would be located here. Also, it would be an elevated place.

The following information and equipment are to be provided at the Emergency Control Center (ECC).

- Intercom, telephone
- P and T telephone
- Safe contained breathing apparatus
- Fire suit/gas tight goggles/gloves/helmets
- Hand tools, wind direction/velocities indications
- Public address megaphone, hand bell, telephone directories
- (Internal P and T) factory layout, site plan
- Emergency lamp/torch light/batteries
- Plan indicating locations of hazard inventories, plant control room, sources of safety equipment, work road plan, assembly points, rescue location vulnerable zones, escape routes.
- Hazard chart
- Emergency shut-down procedures
- Nominal roll of employees
- List of key personnel, list of essential employees, list of Emergency Co-ordinators
- Duties of key personnel
- Address with telephone numbers and key personnel, emergency coordinator, essential employees.
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- Important address and telephone numbers including Government agencies, neighboring industries and sources of help, outside experts, chemical fact sheets population details around the factory.

**Assembly Point:**

Number of assembly points depending upon the plant location would be identified wherein employees who are not directly connected with the disaster management would be assembled for safety and rescue. Emergency breathing apparatus, minimum facilities like water etc. would be organized. In view of the size of plant, different locations are earmarked as assembly points. Depending upon the location of hazard, the assembly points are to be used.

**Fire Fighting Facilities:**

First Aid Fire fighting equipment suitable for emergency should be maintained in each section in the plant. This would be as per statutory requirements. However, fire hydrant line covering major areas would be laid. It would be maintained at 6- kg/cm² pressure. Fire alarms would be located in the bulk storage areas. Fire officer will be the commanding officer of fire fighting services.

**Location of Wind Sock:**

On the top of the Administration block and the top of each production blocks, windsocks shall be installed to indicate direction of wind for emergency escape.

**Emergency Medical Facilities:**

Stretchers, gas masks and general first aid materials for dealing with fire burns would be maintained in the medical center as well as in the emergency control room. Medical superintendent of the township will be the head of the casualty services ward. Private medical practitioners help would be also sought. Government hospital would be approached for emergency help.

Apart from plant first aid facilities, external facilities would be augmented. Names of Medical Personnel, Medical facilities in the area would be prepared and updated. Necessary specific medicines for emergency treatment of Burns for Patients and for those affected by toxicity would be maintained. Breathing apparatus and other emergency medical equipment would be provided and maintained. The help of near by industrial management in this regard would be taken on mutual support basis.

**Ambulance:**

An ambulance with driver availability in all the shifts and an emergency shift vehicle would be ensured and maintained to transport injured or affected persons. Number of persons would be trained in first aid so that, in every shift, first aid personnel would be available.

7.6.3.3 *Emergency Actions*

**Emergency Warning**

Communication of emergency would be made familiar to the personnel inside the plant and people outside. An emergency warning system shall be established.
Emergency Shutdown

There are number of facilities which can be provided to help deal with hazardous conditions, when a tank is on fire. The suggested arrangements are:

1. Stop the production;
2. Dilute contents;
3. Remove heat;
4. Deluge with water; and
5. Transfer contents.

Whether a given method is appropriate depends on the particular case. Cessation of agitation may be the best action in some instances but not in others. Stopping of the feed may require the provision of by pass arrangements. Methods of removing additional heat include removal through the normal cooling arrangements or use of an emergency cooling system. Cooling facilities, which use vapouring liquid, may be particularly effective, since a large increase in vaporization can be obtained by dropping pressure.

Evacuation of Personnel:

There could be more number of persons in the storage area and other areas in the vicinity. The area would have adequate number of exits and staircases. In the event of an emergency, unconnected personnel have to escape to assembly point. Operators have to take emergency shutdown procedure and escape. Time Office maintains a copy of deployment of employees in each shift, at ECC. If necessary, persons can be evacuated by rescue teams.

All Clear Signal:

Also, at the end of an emergency, after discussing with Incident Controllers and Emergency Co-ordinators, the Site Controller orders an all clear signal. When it becomes essential, the Site Controller communicates to the District Emergency Authority, Police, Fire service personnel regarding help required or development of the situation into an Off-Site Emergency.

7.6.3.4 General

Employee Information:

During an emergency, employees would be warned by raising siren in specific pattern. Employees would be given training of escape routes, taking shelter, protecting from toxic effects. Employees would be provided with information related to fire hazards, antidotes and first aid measures. Those who would be designated as key personnel and essential employees should be given training to emergency response.

Public Information and Warning:

The industrial disaster effects related to this plant may mostly be confined to the plant area. The detailed risk analysis has indicated that the pool fire effects would not be felt outside. However, as an abundant precaution, the information related to chemicals in use would be furnished to District Emergency Authority for necessary dissemination to general public and for any use during an off site emergency. Factories of this size and nature are in existence in our state since long time.
Co-ordination with Local Authorities:

Keeping in view of the nature of emergency, two levels of coordination are proposed. In the case of an On Site Emergency, resources within the organization would be mobilized and in the event of extreme emergency, local authorities help should be sought.

In the event of an emergency developing into an off site emergency, local authority and District emergency Authority (normally the Collector) would be appraised and under his supervision, the Off Site Disaster Management Plan would be exercised. For this purpose, the facilities that are available locally, i.e. medical, transport, personnel, rescue accommodation, voluntary organizations etc. would be mustered. Necessary rehearsals and training in the form of mock drills should be organized.

Mutual Aid:

Mutual aid in the form of technical personnel, runners, helpers, special protective equipment, transport vehicles, communication facility etc should be sought from the neighboring industrial management.

Mock Drills:

Emergency preparedness is an important step in planning of Industrial Disaster Management. Personnel would be trained suitably and prepared mentally and physically in emergency response through carefully planned, simulated procedures. Similarly, the key personnel and essential personnel should be trained in the operations.

Important Information:

Once the Plant goes into stream, important information such as names and addresses of key personnel, essential employees, medical personnel, out side the plant, transporters address, address of those connected with Off Site Emergency such as Police, Local Authorities, Fire Services, District Emergency Authority should be prepared and maintained.

7.6.4 Off-Site Emergency Preparedness Plan

7.6.4.1 Introduction

Off-site emergency plan follows the on-site emergency plan. When the consequences of an emergency situation go beyond the plant boundaries, it becomes an off-site emergency. Off-site emergency is essentially the responsibility of the public administration. However, the factory management will provide the public administration with the technical information relating to the nature, quantum and probable consequences on the neighboring population.

The off-site plan in detail will be based on those events, which are most likely to occur, but other less likely events, which have severe consequence, will also be considered. Incidents which have very severe consequences yet have a small probability of occurrence should also be considered during the preparation of the plan. However, the key feature of a good off-site emergency plan is flexibility in its application to emergencies other than those specifically included in the formation of the plan.

The roles of the various parties who will be involved in the implementation of an off-site plan are described below. Depending on local arrangements, the responsibility for the off-site plan
should be either rest with the works management or, with the local authority. Either way, the plan should identify an emergency co-ordinating officer, who would take the overall command of the off-site activities. As with the on-site plan, an emergency control center should be setup within which the emergency co-ordinating officer can operate.

An early decision will be required in many cases on the advice to be given to people living "within range" of the accident - in particular whether they should be evacuated or told to go indoors. In the latter case, the decision can regularly be reviewed in the event of an escalation of the incident. Consideration of evacuation may include the following factors:

a. In the case of a major fire but without explosion risk (e.g. an oil storage tank), only houses close to the fire likely need to be evacuated, although a severe smoke hazard may require this to be reviewed periodically;

b. If a fire is escalating and in turn threatening a store of hazardous material, it might be necessary to evacuate people nearby, but only if there is time; if insufficient time exists, people should be advised to stay indoors and shield them from the fire. This latter case particularly applies if the installation at risk could produce a fireball with very severe thermal radiation effects;

c. For release or potential release of toxic materials, limited evacuation may be appropriate down wind, if there is time. The decision would depend partly on the type of housing "at risk".

Conventional housing of solid construction with windows closed offers substantial protection from the effects of a toxic cloud, while shanty house, which exist close to factories, offer little or no protection.

The major difference between releases of toxic and flammable materials is that toxic clouds are generally hazardous down to much lower concentrations and therefore hazardous over greater distances. Also, a toxic cloud drifting at, say 300 m per minute covers a large area of land very quickly.

Any consideration of evacuation should take this into account. Although the plan will have sufficient flexibility built in to cover the consequences of the range of accidents identified for the on-site plan, it will cover in some detail the handling of the emergency to a particular distance from each major hazard works.

7.6.4.2 Aspects Proposed to be considered in the Off-Site Emergency Plan

The main aspects, which should be included in the emergency plan are:

- **Organization**

Details of command structure, warning systems, implementation procedures, emergency control centers.

Names and appointments of incident controller, site main controller, their deputies and other key personnel.
Communications
Identification of personnel involved, communication center, call signs, network, list of telephone numbers.

Specialized knowledge
Details of specialist bodies, firms and people upon whom it may be necessary to call e.g. those with specialized chemical knowledge and laboratories.

Voluntary organizations
Details of organizers, telephone numbers, resources etc.

Chemical information
Details of the hazardous substances stored or procedure on each site and a summary of the risks associated with them.

Meteorological information
Arrangements for obtaining details of weather conditions prevailing at the time and weather forecasts.

Humanitarian arrangements
Transport, evacuation centers, emergency feeding treatment of injured, first aid, ambulances and temporary mortuaries.

Public information
Arrangements for dealing with the media press office and informing relatives, etc.

Assessment of emergency plan
Arrangements for: (a) Collecting information on the causes of the emergency; (b) Reviewing the efficiency and effectiveness of all aspects of the emergency plan.

7.6.4.3 Role of the Emergency Co-ordinating Officer

The various emergency services should be co-ordinated by an Emergency Co-ordinating Officer (ECO), who will be designated by the district collector. The ECO should liaison closely with the site main controller. Again depending on local arrangements, for very severe incidents with major or prolonged off-site consequences, the external control should be passed to a senior local authority administrator or even an administrator appointed by the central or state government.

7.6.4.4 Role of the Local Authority

The duty to prepare the off-site plan lies with the local authorities. The Emergency Planning Officer (EPO) appointed should carry out his duty in preparing for a whole range of different emergencies within the local authority area. The EPO should liaison with the works, to obtain
the information to provide the basis for the plan. This liaison should ensure that the plan is continually kept up to date.

It will be the responsibility of the EPO to ensure that all those organizations, which will be involved in off-site handling of the emergency situation, know of their role and are able to accept it by having for example, sufficient staff and appropriate equipment to cover their particular responsibilities. Rehearsals for off-site plans should be organized by the EPO.

7.6.4.5 Role of Police

Formal duties of the police during an emergency include protecting life and property and controlling traffic movements.

Their functions should include controlling bystanders, evacuating the public, identifying the dead and dealing with casualties, and informing relatives of death or injury.

7.6.4.6 Role of Fire Authorities

The control of a fire should be normally the responsibility of the senior fire brigade officer who would take over the handling of the fire from the site incident controller on arrival at the site. The senior fire brigade officer should also have a similar responsibility for other events, such as explosions and toxic release.

Fire authorities in the region should be apprised about the location of all stores of flammable materials, water and foam supply points, and fire-fighting equipment. They should be involved in on-site emergency rehearsals both as participants, and on occasion, as observers of exercises involving only site personnel.

7.6.4.7 Role of Health Authorities

Health authorities, including doctors, surgeons, hospitals, ambulances, and so on, should have a vital part to play following a major accident, and they should form an integral part of the emergency plan. For major fires, injuries should be the result of the effects of thermal radiation to a varying degree, and the knowledge and experience to handle this in all but extreme cases may be generally available in most hospitals. For major toxic releases, the effects vary according to the chemical in question, and the health authorities should be apprised about the likely toxic releases from the plant, which will enable them in dealing with the aftermath of a toxic release with treatment appropriate to such casualties.

Major off-site incidents are likely to require medical equipment and facilities additional to those available locally, and a medical "mutual aid" scheme should exist to enable the assistance of neighboring authorities to be obtained in the event of an emergency.

7.6.4.8 Role of Government Safety Authority

This will be the factory inspectorate available in the region. Inspectors are likely to satisfy themselves that the organization responsible for producing the off-site plan has made adequate arrangements for handling emergencies of all types including major emergencies. They may wish to see well-documented procedures and evidence of exercise undertaken to test the plan.
In the event of an accident, local arrangements regarding the role of the factory inspector will apply. These may vary from keeping a watching brief to a close involvement in advising on operations in case involvement in advising on operations. In cases where toxic gases may have been released, the factory inspectorate may be the only external agency with equipment and resources to carry out tests.

7.7 Occupational Health and Safety

Large industries, in general and chemical plants in particular where multifarious activities are involved during construction, erection, testing, commissioning, operation and maintenance, the men, materials and machines are the basic inputs. Along with the boons, the industrialization generally bring several problems like occupational health and safety.

The industrial planner, therefore, has to properly plan and take the steps to minimize the impacts of industrialization and to ensure appropriate occupational health and safety plan including fire plans. All these activities again may be classified under construction and erection, operation and maintenance. The proposed safety plan is given below:

7.7.1 Occupational Health

Occupational health needs attention both during construction and erection and operation and maintenance phases. However, the problem varies both in magnitude and variety in the above phases.

- **Erection Phase**

The occupational health problems envisaged at this stage can mainly be due to constructional accident and noise. To overcome these hazards, in addition to arrangements to reduce it within TLV's, personal protective equipment should also be supplied to workers.

- **Operation and Maintenance**

The problem of occupational health, in the operation and maintenance phase is due to noise hearing losses. Suitable personnel protective equipment should be given to employees. The working personnel should be given the following appropriate personnel protective equipment.

- Industrial Safety Helmet
- Crash Helmets
- Face shield with replacement acrylic vision
- Zero power plain goggles with cut type filters on both ends
- Zero power goggles with cut type filters on both sides and blue color glasses
- Welders equipment for eye and face protection
- Cylindrical type earplug
- Ear muffs
- Canister Gas mask
- Self contained breathing apparatus
- Leather apron
- Aluminized fiber glass fix proximity suit with hood and gloves
- Safety belt/line man's safety belt
- Leather hand gloves
- Asbestos hand gloves
- Acid/Alkali proof rubberized hand gloves
• Canvas cum leather hand gloves with leather palm
• Lead hand glove
• Electrically tested electrical resistance hand gloves
• Industrial safety shoes with steel toe
• Electrical safety shoes without steel toe and gum boots

Full fledged hospital facilities should be made available round the clock for attending emergency arising out of accidents, if any. All working personnel shall be medically examined every six months and at the end of his term of employment. This is in addition to the pre-employment medical examination. The fund allocation for occupational health and safety are presented in Table - 7.12.

### TABLE - 7.12
DETAILS OF FUND ALLOCATION FOR HEALTH AND SAFETY

<table>
<thead>
<tr>
<th>Sr. No.</th>
<th>Particulars</th>
<th>Fund Allocation/Year (In Lakhs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Periodic Health Screening for Employees</td>
<td>1,20,000</td>
</tr>
<tr>
<td>2</td>
<td>Workplace Safety Responsibility</td>
<td>2,00,000</td>
</tr>
<tr>
<td>3</td>
<td>Employees Health and Hygiene</td>
<td>1,80,000</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
<td><strong>5,00,000</strong></td>
</tr>
</tbody>
</table>

*Source: PSPL*

#### 7.7.2 Safety Plan

Safety of both men and materials during construction and operation phases is of concern. The preparedness of an industry for the occurrence of possible disasters is known as emergency plan. The disaster in sulphonation plant is possible due to leakage of hazardous chemicals, collapse of structures and fire/explosion etc.

The details of the fire fighting equipments to be installed are given below;

• Dry Chemical Powder (DCP) Fire Extinguisher
• CO₂ Fire Extinguisher
• Foam type Fire Extinguisher
• Soda acid type Fire Extinguisher
• Fire buckets
• Fire Hydrants

Keeping in view the safety requirement during construction, operation and maintenance phases at sulphonation plant, safety policy should be formulated with the following regulations:

• To allocate sufficient resources to maintain safe and healthy conditions of work.
• To take steps to ensure that all known safety factors are taken into account in the design, construction, operation and maintenance of plants, machinery and equipment.
• To ensure that adequate safety instructions are given to all employees.
• To provide necessary protective equipment, safety appliances and clothing wherever necessary and to ensure their proper use.
• To inform employees about materials, equipment or processes used in their work, which are known to be potentially hazardous to health or safety.
• To keep all operations and methods of work under regular review for making necessary changes from the point of view of safety.
To provide appropriate facilities for first aid and prompt treatment of injuries and illness at work.

To provide appropriate instruction, training, retraining and supervision to employees in health and safety, first aid and to ensure that adequate publicity is given to these matters.

To ensure proper implementation of fire prevention methods and an appropriate fire fighting service together with training facilities for personnel involved in this service.

To organize collection, analysis and presentation of data on accident, sickness and incident involving personal injury or injury to health with a view to taking corrective, remedial and preventive action.

To promote through the established machinery, joint consultation in health and safety matters to ensure effective participation by all employees.

To publish/notify regulations, instructions and notices in the common language of employees.

To prepare separate safety rules for each types of occupation/processes involved in a project.

To ensure regular safety inspection by a competent person at suitable intervals of all buildings, equipment, work places and operations.

### 7.7.3 Safety Organization

#### Erection Phase

A qualified and experienced safety officer should be appointed. The responsibilities of the safety officers include identification of the hazardous conditions and unsafe acts of workers and advice on corrective actions, conduct safety audit, organize training programs and provide professional expert advice on various issues related to occupational safety and health. He is also responsible to ensure compliance of Safety Rules/ Statutory Provisions. In addition to employment of safety officer by sulphonation plant, every contractor, who employs more than 250 workers, should also employ one safety officer to ensure safety of the worker, in accordance with the conditions of contract.

#### Operation and Maintenance Phase

When the construction is completed the posting of safety officers should be in accordance with the requirement of Factories Act and their duties and responsibilities should be as defined there of.

### 7.7.4 Safety Circle

In order to develop the capabilities of the employees in identification of hazardous processes and improving safety and health, safety circles would be constituted in each area of work. The circle would consist of 5-6 employees from that area. The circle normally should meet for about an hour every week.

### 7.7.5 Safety Training

A full-fledged training center should be set up at the plant. Safety training should be provided by the Safety Officer with the assistance of faculty members called from Corporate Center, Professional Safety Institutions and Universities. In addition to regular employees, limited contractor labors should also be provided safety training. To create safety awareness safety
films should be shown to workers and leaflets etc should be distributed. Some of the precautions and remedial measures proposed to be adopted to prevent fires are:

- Compartmentation of cable galleries, use of proper sealing techniques of cable passages and crevices in all directions would help in localizing and identifying the area of occurrence of fire as well as ensure effective automatic and manual fire fighting operations;
- Spread of fire in horizontal direction would be checked by providing fire stops for cable shafts;
- Reliable and dependable type of fire detection system with proper zoning and interlocks for alarms are effective protection methods for conveyor galleries.
- Housekeeping of high standard helps in eliminating the causes of fire and regular fire watching system strengthens fire prevention and fire fighting; and
- Proper fire watching by all concerned would be ensured.

7.7.6 Health and Safety Monitoring Plan

All the potential occupational hazardous work places such as fuel storage, material handling areas should be monitored regularly. The health of employees working in these areas should be monitored once in a month for early detection of any ailment due to exposure to hazardous chemicals.

7.7.6.1 Medical Surveillance

The industry has tie up with the medical center for all the employees health monitoring. All the employees will be examined periodically by the standard qualified doctors once in a month to determine the health status of the workers in respect of occupational health hazard to which they are exposed.

- Hazardous area wise list will be prepared by the medical officers to perform the specific test for the working employees.
- No person will be sign up to operate the crane, locomotive or work-lift or give signals unless his eye sight and color vision will be properly examined by the concern ophthalmologist.

7.7.6.2 Industrial Medical Center Responsibilities

- Surveillance of workers health in relation to work;
- Surveillance of working environments;
- Identification and evaluation of environmental factors which may affect the worker’s health;
- Assessment of conditions of occupational workers health; and
- Observance of safety norms and reduce/eliminate exposure to hazardous environs.

7.7.6.3 Employees Training Programme

The industry will provide the certain training program to the working employees. The training programme will includes the hazardous operation, usage of the nose mask and earplugs, Engineering Act and working process in connection with their jobs roles.
7.7.6.4 List of Test for Working Employees

List of tests are being conducted for every month to the workers such as:

- X-ray Chest View
- Electro Cardiogram (ECG)
- Eye Fitness
- Spirometry Test
- Audiogram Test

7.7.6.5 Medical Examination

The PSPL will take up medical examination activities periodically to assess hazards due to gases, dusts, vibrations, radiations etc.

7.8 Social Impact Assessment

It has been brought out during the socio-economic survey (based on census data) that non-workers constitute about 58% of the total population in 10-km radius study area. Some of them will be available for employment in the proposed unit during construction activities. As the labourers are generally un-skilled, the locals would get opportunities for employment during construction activities. The peak labour force required during the construction period is estimated to be about 120 No’s and preference shall be given to local labourers particularly unskilled labours.

In addition to the opportunity of getting employment as construction labourers, the local population would also have employment opportunities in related service activities like petty commercial establishments, small contracts/sub-contracts and supply of construction materials for buildings and ancillary infrastructures etc. Consequently, this will contribute to economic upliftment of the area.

Normally, the construction activity will benefit the local populace in a number of ways, which include the requirement of construction labourers (skilled, semi-skilled and un-skilled), tertiary sector employment and provision of goods and services for daily needs including transport.

In line with the above, some more recommendations are given below:

- Local people shall be given preference for employment;
- All the applicable guidelines under the relevant Acts and Rules related to labour welfare and safety shall be implemented during the construction work;
- The contractor shall be instructed to provide fire wood/kerosene/LPG to the workers to prevent damage to trees; and
- The construction site shall be secured with fencing and shall have guarded entry points.

7.8.1 Socio Economic Development Activities

The proposed project will provide direct employment to about 35 persons and indirect employment to about 60 persons. Apart from the employment and business opportunities for the local people, they will also be benefited in the areas such as education, health care,
infrastructure facilities and women empowerment. Some of the corporate social responsibility activities proposed under the proposed project with total cost of Rs. 18.75 lakhs are listed below.

- Tree plantation, Bus shelter and safe drinking water facilities for nearby villages.
- A medical camp with free medicine for nearby villagers.
- Infrastructure facilities such as sanitary, library, sports amenities and smart classroom to government schools
- Sponsorships / Scholarships for deserving students of government schools and distribution of school supplies.

7.9 Public Hearing

The public hearing for the proposed Sulphonation Plant was conducted through Puducherry Pollution Control Committee (PPCC) on 16th October 2017 at Gopalsamy Naikar Marriage Hall, NH-45A, Villianur Bypass Road, Ariyapalayam, Villianur, Puducherry.

The press notification indicating date and venue of the public hearing was issued by Member Secretary, Tamil Nadu Pollution Control Board (TNPCB), on 16th September, 2017 in prominent newspapers i.e. The New Indian Express and Dinamalar with project details inviting suggestions, views, comments and objections from the public regarding the proposed Sulphonation Plant at Pondicherry Industrial Promotion Development & Investment Corporation Limited (PIPDIC) Industrial Estate, Sedarapet, Villianur Commune Panchayat, Puducherry.

During the public hearing Thiru. E. Vallavan (District Collector), Thiru. Dr. N. Ramesh (Environmental Engineer), Department of Science, Technology and Environment/ Pondicherry Pollution Control Committee, PSPL staffs and public were present and attended the public hearing. Total public hearing statements were recorded in the minutes of meeting. The comments/suggestions raised during the public hearing were summarized by Puducherry Pollution Control Committee and is attached as Annexure – XIV.

A total number of 5 persons came forward and registered their comments/views on the project and the responses given by the project proponent are as follows.
## Comments/Issues raised

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<th>Sr. No.</th>
<th>Comments/Issues raised</th>
<th>Response by Project Proponent</th>
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<tbody>
<tr>
<td>1.</td>
<td>Thiru. C. Sakthivel, Secretary, Villianur Iyarkai Padukappu Maiyyam, Villianur, Puducherry: The Revenue Village name is mentioned as Sedarapet but, the Resurvey Number of the Project Location is not mentioned. M/s. Power Soap Private Limited is presently functioning in Embalam Revenue Village. This factory has polluted kuduvaiyar River by releasing effluent and three cows have died due to this. District Collector intervened and said that the purpose of the meeting is to obtain the views on proposed new project at Sedarapet and not the existing industry. He requested the industry representatives to look into the allegation made on their existing industry and take necessary corrective action. He also said that the Government will take appropriate action on this. This is a dangerous industry and would affect the environment of Puducherry. The ground water quality has become saline in Puducherry. The industry proposes to purchase fresh water which is drawn from ground water sources within Puducherry only. This will affect ground water. Ousteri lake which is a declared bird sanctuary is located nearby. The lake is already polluted due to waste water from surrounding villages and industries being carried away to the feeder channels. This industry will also cause pollution of the lake. There is no benefit to Puducherry by this Industry. This industry should not be permitted.</td>
<td>The proposed plant site is located in PIPDIC industrial estate of Sedarapet village, Villianur Commune Panchayat, Puducherry. The Revenue Survey Numbers are 27/2, 27/3, 27/4, 27/5, 27/6, 27/7, 30/1, 30/2, 30/3, 30/4, 30/5, 30/6, 30/7, 30/8, 31/1, 31/2, 31/3, 31/4, 31/5 &amp; 31/6. No effluent is discharged from the existing industry and the industry was inspected and verified by the Government agencies during the allegation. Sulphonation Plant does not involve the usage of hazardous chemicals. The raw materials will be used, with due consideration to the respective material safety data sheets. A Disaster Management Plan has been formulated especially for Power Soaps Private Limited, in line with the District Disaster Management Plan to ensure safety of life, protection of environment, protection of installation, restoration of production and salvage operation. Also, the project proposed to utilize the treated water from Sewage Treatment Plant, PWD, Government of Puducherry for the industrial purpose to the possible extent and the balance will be met from the private supplier. In order to enable water conservation, the waste water from the plant process will be treated in the Effluent Treatment Plant (ETP) and will be reused within the plant. Appropriate Rain Water Harvesting measures will be undertaken within the plant to recharge the ground water. The Ousteri lake is located at a distance of 4.0 Km, South direction from the proposed plant site. No waste water will be discharged outside the premises and Zero Liquid Discharged will be ensured during the plant operation. Also, SO$_2$ Absorber, Electrostatic Precipitator (ESP) and Alkali Scrubber are proposed for controlling the SO$_2$ emissions from the Sulphonation Process. Greenbelt is already available in the periphery of the plant.</td>
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### Chapter 7

#### Additional Studies

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<th>Sr. No.</th>
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<th>Response by Project Proponent</th>
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<tr>
<td></td>
<td></td>
<td>Additional greenbelt will be developed in the plant to attenuate the fugitive emissions and noise levels. Hence, there will not be any adverse impacts on the Ousteri Lake Bird Sanctuary.</td>
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<td></td>
<td></td>
<td>In addition to the above measures, a wildlife conservation plan for Ousteri Lake has been prepared and it will be implemented.</td>
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<td></td>
<td>The Proposed Sulphonation Plant will help in generating both direct and indirect employment both during the construction and operation stage to the people of Puducherry. The proposed CSR activities will help in the socio-economic uplift of the surrounding villages.</td>
</tr>
<tr>
<td>2.</td>
<td><strong>Thiru. Davamani, Mangalam, Puducherry:</strong>-</td>
<td>The Project Proponent acknowledged the support shown by the Public.</td>
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<td></td>
<td>The proposed industry should function without affecting the environment and public.</td>
<td></td>
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<td></td>
<td>Employment opportunity should be given only for Puducherry citizens as there is very less job opportunities to the educated youths in Puducherry.</td>
<td></td>
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<td></td>
<td>The Project Proponent gave their assurance that the proposed Sulphonation plant will be operated in an ecofriendly manner by implementing mitigation measures to nullify the possible impacts that may arise due to the proposed project by providing effective pollution control technology. Therefore the proposed plant will be operated without affecting the Public and environment. Preference will be given to local citizens for employment based on their educational qualification.</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td><strong>Thiru. R. Alagappan, Mangalam, Puducherry:</strong></td>
<td>As mentioned by the Public, the Proposed Unit at Sedarapet, Puducherry will help to bring about social and economic development of the people in the surrounding villages. Basic infrastructure will be developed.</td>
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<td></td>
<td>Because of the existing Power Soap industry in Sembipalayam village the surrounding villages have developed well. Similarly the proposed unit at Sedarapet will lead to development of surrounding villages.</td>
<td></td>
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<td>4.</td>
<td><strong>Tmt. Pachiammal, Sembipalayam, Puducherry:</strong></td>
<td>The Project Proponent expressed their gratitude and acknowledged the faith shown by the Public towards Power Soaps Private</td>
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</table>
### Sr. No. | Comments/Issues raised                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Response by Project Proponent                                                                                                                                                                                                                                                                                                                                 |
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<td>5.</td>
<td><strong>Thiru. V. Sunanda Reddy, Environmentalist</strong></td>
<td>Data on the health status of the employees and villagers, crop productivity and ground water availability status will be collected. Adequate Rain water harvesting structures in the form of underground collection tanks and percolation pits will be constructed to harvest the rain water from roofs and run-off water from landscapes areas/roads respectively. The greenbelt will be developed in an area covering 33.5% of the total area. Provisions will be made to increase the area of the greenbelt in future. Also, fruit bearing and medicinal plants will be planted in PIPDIC, after consultation with officials. A CSR coordinating committee will be formed with members from the villages and government officials to monitor the proper spending of the fund. Proper Pollution Control measures involving ESP and Alkali Scrubber for absorbing the SO₂ gas from the Sulphonation Process; ETP for treatment of waste water and greenbelt are proposed to reduce the fugitive emissions and to attenuate the noise levels. Further good housekeeping and safety precautions/devices for men and material will be ensured within the Plant.</td>
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<tr>
<td></td>
<td>Our Sembipalayam Village has developed so much that after the existing Power Soap industry was started in our village. Industry has provided employment opportunity to local villagers. There are no adverse effects on the environment due to the industry. Hence we have no objection for the new industry.</td>
<td>Limited.</td>
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#### 7.9.1 Enterprise Social Commitment

No major issues were raised during the Public Hearing, for the proposed Sulphonation Plant. However, few suggestions were received regarding tree plantation, ground water status and rain water harvesting structures in the nearby schools. These activities will be covered under the Enterprise Social Commitment and an amount of Rs. 5.0 Lakhs is proposed to be spent.