



SILVASSA

Industries & Manufacturers Association

Reg. No. 27/SIAMA/2011 Dt. 11-11-2011

Office No. 8, Danudyog Shopping Center,
Opp, Hirvavan Garden,
Piparia, Silvassa- 396 230.
(U.T. of Dadra & Nagar Haveli)

Tel. : (0260) 2640349
Cell : 076000758821, 07600673570
Email : sima_silvassa@yahoo.in
simasilvassa@gmail.com
Website : www.simadnh.org

President

Sh. C. M. Parekh

Vice-President

Sh. Atul Shah

Vice-President

Sh. Sunil Ijari

Vice-President

Sh. Ajit Deshpande

Date: - 06.01.2015

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Executive Secretary

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Joint. Secretary

Sh. Dilip Parmar

Treasurer

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Joint Treasurer

Sh. Deepak Desai

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Sh. Mahesh Chauhan

Sh. Atul Patel

Sh. Manish Ranka

Sh. R. P. Sinha

Sh. R. P. Sharma

Sh. S. N. Agarwal

Smt. Deepika Surma

Smt. Pinki Khemnani

Advisory Board Members

Sh. Vinit Mundra

Sh. Harshad Doshi

Sh. Nitin Kopikar

Sh. Pradeep Lele

Sh. Nirmal Jain

To,
Member Secretary,
Pollution Control Committee,
Dadra & Nagar Haveli,
Silvassa.

Sub:- Suggestions/Objections in reference to the notification No.
PCC/DMN/13-III/755, dated 10-10-2014.

Dear Sir,

Vide our earlier letter dated 06.12.2014, our association SIMA has already submitted some suggestions and comments on the proposed Draft Notification no. PCC/DMN/13-III/755 dtd: 10/10/2014. In continuation to our said representation, we would like to add the following suggestion/objection and comments in respect to the said notification.

- 1) We would like to bring to your kind notice that at present PCC is not permitting for Compression of Natural gas and its separation process like Oxygen, Nitrogen, Carbon - Dioxide and Argon.

We request the members of PCC, to review the issue and permit the refilling of above gases as service industries. We submit that by the process of refilling of the said gases is not going cause any pollution and for that we submit the detailed justification for allowing the refilling of above gases as under:-

Justification

- As per the classification of industrial activities by CPCB and PCC manufacturing of Industrial and Inorganic Gases activities fall under red category of industrial activity.

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6/1/2015

प्रेमण लिपिक / Despatch Clerk
प्रशासक सचिवालय
Administrator's Secretariat
सिलवासा - Silvassa.

राष्ट्रीय नियंत्रण समिति
POLLUTION CONTROL COMMITTEE
क्षेत्रीय कार्यालय / Regional Office
दमन, दिव एवं दादरा नगर हवेली
Daman, Diu and Dadra Nagar Haveli
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- As per the CPCB description regarding Industrial and inorganic gases covered: - (a) Chemical gases: Acetylene, Hydrogen, Chlorine, Fluorine, Ammonia, Sulphur Dioxide, Ethylene, Hydrogensulphide, Phosphine (b) Hydrocarbon gases: Methane, Ethane, Propane. As these gases are considered as toxic or highly flammable and manufacturing of the same involves hazardous and pollution generated process which require effective and adequate environment management plan.
- Whereas as per CPCB description manufacturing of Oxygen gas, Nitrogen Gas, Carbon Dioxide gas and Argon gas by compression of natural air and separation process are not covered under the classification as red category of products.
- Oxygen gas, Nitrogen gas, Carbon Dioxide gas and Argon gas are not covered under toxic or highly flammable category of products.
- Oxygen gas is used for life saving purpose in the hospitals and health care institutions.
- Carbon dioxide gas is used for fire fighting purposes.
- Nitrogen gas is used in automobiles and to maintain inert atmosphere as it is non reactive gas.
- Argon gas is widely used in engineering applications.
- Oxygen gas, Nitrogen Gas, Carbon Dioxide gas and Argon gas are obtained by compression of natural air and separation process. These gases are naturally available gases and not manufactured by any synthesis process. Whereas other industrial and inorganic gases are manufactured by chemical synthesis process.



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- Hence the installation of plant to obtain Oxygen gas, Nitrogen Gas, Carbon Dioxide gas and Argon gas by compression of natural air and separation process in the Union Territory should be considered as green category in line of Gujarat State. Also installation of these types of plant will create easy availability of life saving and fire fighting gases, good employment and good revenue in the territory.

- Even there is no approval of District Magistrate is not required for storage of above mention cases under rule 46-A, Sub RULE(6) wide G.S.R. 372(E) DATED 17th May 2001. (copy enclosed herewith)

- 2) Manufacturing of Non ferrous metal and its product from Non Ferrous Metal scrap as raw material using melting furnaces.

At present PCC is not permitting manufacturing of Non Ferrous Metal and its product from Non Ferrous Metal scrap as raw material.

Sir, we would like to submit herewith that PCC should grant the permission to manufacture Non Ferrous Metal and its products from Non Ferrous Metal scrap for that we are submitting our justification as under.

Justification

- Manufacturing of Non Ferrous Metals and its products using pure metal or scrap as raw material are considered as secondary Metallurgical Processing activities. These activities do not involve any highly polluted activities like wet processing, calcinations and smelting.
- As per the classification of industrial activities by PCC Manufacturing of Non Ferrous Metals and its products using pure metal (in the form of billets, ingots and cathodes) is covered under Orange category and permitted to install manufacturing plant.
- Whereas As per the classification of industrial activities by CPCB manufacturing of Manufacturing of Non Ferrous Metals and its



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products from Non Ferrous Metal scrap as raw material using melting furnaces covered under Orange Category of activities.

- Non Ferrous Metal Scrap contains pure metal @ more than 99% which can be easily extracted during melting in the furnaces where the pure metals are melted and this does not require installation of any additional plant and machineries. Also these scraps do not require any pre treatment like wet extraction process or chemical process. And there is no use of water and no waste water generation which require treatment and disposal.
- Manufacturing of Non Ferrous Metal and its product from Non Ferrous Metal scrap as raw material using melting furnaces will decrease cost of production and increase productivities, create more employment potential and more revenue generation in the territory.
- Also there is no implementation of additional Environment Management Plan for extraction of non ferrous metals from scrap using melting furnaces.
- Hence; manufacturing Non Ferrous Metals and its products from Non Ferrous Metal scrap as raw material using melting furnaces in the Union Territory should be considered as Orange category of permitted activities as this activity is considered as Orange category in Gujarat State. Also installation of these types of plant will create more employment, revenue and export potential in the territory.

You are therefore requested to consider our justification given as above and grant the permission to for refilling of Oxygen, Nitrogen, Carbon-dioxide and Argon gas under service industries.

In same line as per the justification provided here-in-above you are requested to allow manufacturing of Non Ferrous Metal and its products from Non Ferrous Metal scrap as raw material using melting furnaces.



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As these industries are not going to cause any damage to environment of this Territory and shall generate huge employment and revenue. The said permission should be granted.

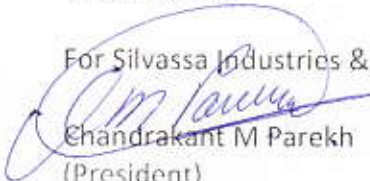
We, Silvassa Industries & Manufacturers Association extend our sincere thanks for giving us the opportunity to express our views and comments through this representation. We further request your good self that our association should be given a personal hearing before taking any final decision on our representations.

We would like to state that, the representatives of industries from various categories should be adopted on the Board of PCC, so that the members of PCC can understand the practical difficulties and hassles of Industrial sector.

Thanking you,

With regards,

For Silvassa Industries & Manufacturers Association


Chandrakant M Parekh
(President)

Copy to: Hon'ble Administrator, Daman & Diu and Dadra & Nagar Haveli for information.

Encl: Annexure - I

- (i) specifications and plans drawn to scale in triplicate clearly indicating—
 - (a) the manner in which the provisions prescribed in these rules shall be complied with;
 - (b) the premises proposed to be licensed, the area of which shall be distinctly coloured or otherwise marked;
 - (c) the surrounding area lying within 100 meters of the edge of all facilities which are proposed to be licensed;
 - (d) the position, capacity, materials of construction and ground and elevation views of all vessels, all valves and fittings, filling and discharge pumps and fire-fighting facilities where provided and all other facilities forming part of the premises proposed to be licensed; and
- (ii) a scrutiny fee of rupees one hundred paid in the manner specified in rule 11.

(2) If the Chief Controller, after scrutiny of the specifications and plans and after making such inquiries as he deems fit, is satisfied that compressed gas can be stored in the premises proposed to be licensed, he shall return to the applicant one copy each of all the specifications and plans signed by him conveying his sanction which may be subject to such conditions as he may specify.

✓ [46A. No-objection Certificate.—(1) An applicant for a new licence other than a licence in Form IV, shall apply to the District Authority with two copies of site plan showing the location of the premises proposed to be license under these rules for a certificate to the effect that there is no objection to the applicant's receiving a licence for storage of compressed gas in pressure vessel at the site proposed, and the District Authority shall, if he sees no objection, grant such certificate to the applicant who shall forward it to the Chief Controller with his application.

(2) Every certificate issued by the District Authority under sub-rule (1) above shall be accompanied by a copy of the plan of the proposed site duly endorsed by him under his official seal.

(3) The Chief Controller, may refer an application not accompanied by a certificate granted under sub-rule (1) to the District Authority for his observation.

(4) If the District Authority, either on a reference being made to him or otherwise, intimates to the Chief Controller that any licence which has been applied for should not, in his opinion, be granted, such licence shall not be issued without the sanction of the Central Government.

(5) Notwithstanding anything contained in sub-rules (1) to (4) above, all licences granted or renewed under the said rules prior to the date on which the above provisions come in force, shall be deemed to have been granted or renewed under these rules.]

1. Ins. by G.S.R. 141(E), dated 14th February, 2000 (w.e.f. 18-2-2000).

¹[(6) The provisions of this rule shall not apply to non-flammable, non-toxic compressed gases.]

47. Licence for transport of compressed gas.—(1) No compressed gas filled in a vessel shall be transported by a vehicle except under and in accordance with the conditions for a licence granted under these rules.

(2) Nothing in this rule shall apply to the transport of compressed gas filled in a vessel by a railway administration.

48. Grant of licence.—A licence prescribed under these rules shall be granted by the Chief Controller on payment of the fees specified in the ²[Schedule I] attached to these rules.

²[**49. Application for licence.**—A person intending to obtain a licence under these rules shall submit to the Chief Controller,—

- (i) an application,—
 - (a) in Form I, if the application is in respect of a licence to store compressed gas in pressure vessels;
 - (b) in Form II, if the application is in respect of a licence to transport compressed gas in a pressure vessel by a vehicle;
 - (c) in Form IA, if the application is in respect of a licence to store and dispense liquefied petroleum gas as automotive fuel;
- (ii) a certificate of safety under rule 33 or rule 43 as the case may be;
- (iii) a test and inspection certificate as required under sub-rule (2) of rule 12;
- (iv) four copies of the drawings approved by the Chief Controller under rules 35 and 46;
- (v) licence fee as specified in the Schedule I;
- (vi) No-Objection Certificate from the District Authority in respect of storage of compressed gas in pressure vessels along with the site-plan duly endorsed;
- (vii) copy of the Registration Certificate of the vehicle issued under Motor Vehicles Act, 1988 (59 of 1988) in respect of mobile pressure vessels for transport of compressed gas.]

50. Period for which licences may be granted or renewed.—²[(1) A licence, in Form III or Form V for the storage of compressed gas in pressure vessel, or in Form IV for the transport of the compressed gas in a pressure vessel by a vehicle, shall be granted or renewed subject to a maximum of three years and shall remain in force until the thirty-first day of March of the year upto which the same is granted or renewed.]

(2) Notwithstanding anything contained in sub-rule (1), the Chief Controller may, if he is satisfied that a licence is required for a specific work which is not likely to last up to the 31st day of March of the year up to which

¹ Ins. by G.S.R. 372 (E), dated 17th May, 2002 (w.e.f. 17-5-2002).

² Subs. by G.S.R. 141 (E), dated 14th February, 2000 (w.e.f. 18-2-2000).