



KERALA STATE POLLUTION CONTROL BOARD

കേരള സംസ്ഥാന മലിനീകരണ നിയന്ത്രണ ബോർഡ്

Pattom P.O., Thiruvananthapuram – 695 004

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Sub: KSPCB - Ease of Doing Business - Environmental compliance monitoring - Software based tool for Randomized Risk Based Inspections - Instructions - Issued - Reg.

The Govt. has introduced ‘Ease of Doing Business’, wherein it is mandated to Design and Implement a system for identifying establishments that need to be inspected based on computerized risk assessment and online submission of inspection report within 48 hours to the Department. It also mandates to allow users (industries) to login to the portal and view and download submitted inspection reports on their businesses. A well defined inspection procedure and check list is required. A system is to be designed and implemented for computerized allocation of inspectors within a mandate that the same inspector will not inspect the same establishment twice consequently.

In this regard, the following action is taken:

- A well defined inspection procedure and checklist is prepared for uploading on Boards website (Annexure-I)
- A software based tool ‘**Computerized Inspection Allocation**’ is being designed by NIC for compliance inspections under the Water (Prevention and Control of Pollution Act, 1974 and Air (Prevention and Control of Pollution Act, 1981). This system is for identifying establishments that need to be inspected based on computerized risk assessment.
- The above tool mandate online submission of inspection reports within 48 hours to the Department (Inspection report format Annexure - II)
- The system allows users (industries) to login to the portal to view and download submitted inspection reports on their businesses.
- The system is designed for computerized allocation of inspectors and mandates that the same inspector will not inspect the same establishment twice consecutively.

In view of the above, considering the shortage in staff and number of industries existing, the following instructions are issued:

- Under ‘**Computerized Inspection Allocation**’, establishments that need to be inspected will be identified based on computerized risk assessment. There will be computerized allocation of inspectors to carryout inspections. The system ensure that no inspector will inspect the same establishment twice consecutively.
- The inspection will be allocated based on the following schedule:

Category	Inspection schedule based on risk/pollution potential	
Red Category (High Risk)	17 category industries as identified by CPCB, Ports, CETPs, TSDF, CBMWTFs, Ferro Alloy industries	To be inspected once in 6 months

- The Chief Environmental Engineer and Environmental Engineer in Regional Office and District Offices shall carryout the inspection of establishments (industries) as per the allocation.
- The inspectors shall submit online inspection reports within 48 hours to the concerned District Offices/Regional Offices.
- After submission of report by the inspector, login ID and password will be communicated to the mobile number of authorized person of the industries (users) to login to the portal to view and download submitted inspection report on their business.

The above instructions are issued in order to achieve various mandates under 'Ease of Doing Business'. However, in the matter related to legal cases / complaints/press clippings/issues referred by Govt. & other authorities, the concerned DO/RO/HO officials shall carryout inspections as per the instructions issued therein so as to take further action for implementation of various Environmental Laws.

The Board reserves its right and power as per the provisions laid under the environmental laws and Rules in vogue to issue directions/orders as deemed fit in the interest of Public Health and Environment.

Encl: Annexure I & II

Sd/-
MEMBER SECRETARY

TO

1. The Chief Environmental Engineer,
Regional Office,
Thiruvananthapuram, Ernakulam, Kozhikode
2. The Environmental Engineer,
District Office,
Thiruvananthapuram, Kollam, Pathanamthitta, Alapuzha, Idukki, Kottayam,
Ernakulam-1, Ernakulam-2, ESC - Eloor, Thrissur, Palakkad, Malappuram,
Kozhikode, Kannur, Wayanad, Kasargod.

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**KERALA POLLUTION CONTROL BOARD
INSPECTION PROCEDURE
FOR
COMPLIANCE INSPECTION UNDER WATER AND AIR ACTS**

Compliance inspections are inspections carried out to evaluate or verify compliance status of conditions and standards that have been stipulated to the establishments / industries.

Objective:

- The objective of the compliance inspection is to verify whether the industries/ establishments are operating in compliance with stipulated standards & conditions, and if not, to collect the evidence for taking action to prevent environmental pollution.
- The compliance inspections are also aimed to provide necessary guidance/ directions to the industries to improve their compliance status with the stipulated conditions.
- The compliance inspections help the Board to ensure that industries take all necessary measures to control environmental pollution.

Computerized Inspection Allocation

- The “Computerized Inspection Allotment” (CIA system) will allot the Board official (herein after referred to as “Inspector”) for compliance inspection of the establishment / industry under provisions of Water and Air Acts.
- The inspector shall inspect the industry to verify compliance status of the conditions stipulated under Water and Air Acts by duly following the procedure given below:

Pre-inspection activities:

- The inspector shall collect background information such as location and compliance history of the industry to be inspected. This background information enables the inspector to become familiar with the industry operations and any previous issues before entry. This will also enable the inspector to note areas that may need more detailed verification/investigation during the inspection.
- The inspector can obtain and review the following information about the industry, which may be available at DO, RO, HO
 - Exact location of the industry
 - Latest consent orders issued to the industry.
 - Line of activity and operating scale of the industry
 - Manufacturing processes carried out by the industry
 - Previous inspection records and reports.
 - Track record of the industry with respect to closure orders / directions issued by the Board, if any.

Inspection procedure

- Inspection shall be made during regular working hours of the establishment / industry except when special circumstances indicate otherwise.
- Before entering into the industry, the inspector shall inspect surrounding areas along the boundary of the industry to verify if there is any discharge of effluents or dumping of solid or hazardous waste.
- Thereafter, the inspector shall inspect the industry. At the beginning of the inspection, the inspector shall locate the occupier / representative of the occupier / person in charge of the industry and inform about the purpose of the proposed inspection.
- The inspector shall inspect following areas in the industry premises, in addition to other areas as required, to verify compliance status:
 - Manufacturing area

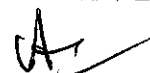
- Raw materials and finished products storage area
- Waste storage area
- Effluent generating sources
- Effluent collection, storage, treatment and disposal areas
- Air pollution sources and control systems
- Solid and hazardous waste generation sources, storage and disposal areas
- Environment management cell to verify record maintenance.
- The inspector shall verify all the records pertaining to production, water pollution & control, air pollution & control, management of solid and hazardous waste.
- The inspector shall verify and collect specific information of the following points:
 - Operational status of the industry (whether in operation/seasonal/sick/closed, etc)
 - Production records for a period of last six months (Excise Returns)
 - Consumption quantities of major raw materials during a period of last six months.
 - Details of water consumption and status of flow meters provided for recording water consumption for various purposes along with meter readings.
 - Effluent generation sources and quantities (as per records)
 - Effluent collection, treatment and disposal details.
 - Operation and maintenance of effluent treatment systems.
 - Status of flow meters provided for recording effluent generation, treatment and disposal along with meter readings.
 - Air pollution sources and control measures
 - Operations and maintenance of air pollution control equipment/systems.
 - Status of energy meters provided for effluent treatment and air pollution control systems along with meter readings.
 - Details of solid and hazardous waste generation, storage and disposal.
- During inspection necessary effluent/air/solid samples shall be collected duly following the procedures and submit the samples in the laboratory on the day of inspection itself. The analysis reports shall be submitted online within 5 days.
- If any representative/occupier of the industry wilfully delays or obstructs the inspector in carrying out inspection, the same shall be recorded in the inspection report for taking further necessary action in the matter. The inspector shall collect photographic/video graphic evidence for observations of non-compliance.
- The inspector may seek information/clarifications or documentary evidence from the industry to ascertain compliance status.
- During inspection, the inspector shall take all safety precautions required such as PPE, helmets, masks, goggles, etc. At the end of the inspection, the inspector may inform the representative of the industry about apparent non-compliance observed during inspection so that industry may initiate necessary corrective action wherever required.

Post-inspection activities:

- The inspector shall prepare inspection report in the prescribed format duly reporting compliance status of the industry with the conditions stipulated under Water and Air Acts.
- The inspector shall indicate additional measures if any to be taken up by the industry to comply with conditions.
- The inspection report in the prescribed format shall be submitted through online within 48 hours of the inspection.
- The supporting documents and photographs obtained during inspection, if any shall be uploaded in KSPCB website along with the inspection report.

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Inspection Report format for Computerized allocation of inspections

(Compliances inspection under Waste Act, 1974 & Air Act, 1981)

1	A. Name of the industry	
	B. Address of the industry	
	C. E-mail	
	D. Mobile	
	E. Telephone	
2	Date of inspection	
3	Name and Designation of the person contacted	
4	Line of Activity & Category	
5	Status of operation (operational/non-operation/closed/any other-if non-operational-reason and period of non-operation)	
6	Status of consent under the Waster & Air Acts & HW Authorization. (Order date & validity period)	
7	a. Name of the product(s) and by-products manufactured with quantity (per day or month or annum)	
	b. Comments on whether the products are permitted products and production is within the permitted capacity (Duly verifying Excise returns of 6 months)	
8	Name of major raw materials with quantity (per day or month or annum)	
9	a. Details of the water consumption and flow meters status.	
	b. Flow meter readings	
10	a. Details of the effluent generation and flow meters status.	
	b. Flow meter readings.	
11	a. Details of the Effluent Treatment systems and disposal	
	b. Compliance with standards stipulated based on Board date/online monitoring systems:	
12	a. Details of sources of Air pollution and Control equipment and systems	
	b. Compliance with standards stipulated based on Board data / online monitoring systems:	
13	Details of solid and hazardous waste generation, storage and disposal	
14	Furnish details of any deviation/Non-compliance observed from consent / authorization / directions	

15	Other relevant information regarding the industry, including complaints	
16	Recommendations:	

Date:

Name & Designation of
Inspecting Officer:

Place:

Signature of Inspecting
Officers

CHECKLIST

For Compliance inspection under Water Act, 1974 & Air Act, 1981 and HW Rules

	The inspection team shall verify the following during inspection.
i.	Consent status & compliance of the industry.
ii.	Production details as per excise returns.
iii.	If producing un consented products verify manufacturing process to identify new pollutants
iv.	Pollution sources (Water, Air & Solid waste), quantities & Status of Control Systems and compliance with standards
v.	Status of flow meters
vi.	Energy meter readings of APCE & ETP
vii.	Status of Water Cess payment
viii.	Environment Records (ETP Log books, APCE log books & Haz. Waste records)

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