Minutes of 39^{th} meeting of Expert Appraisal Committee for the proposal involving violation of EIA Notification, 2006 held on 04^{th} December, 2020

Following members were present in the meeting:

- (i) Dr. Satish R Wate -Chairman
- (ii) Dr. G.V. Subrahmanyam -Member
- (iii) Dr. A.L. Ramanathan -Member
- (iv) Shri K Gowarappan -Member
- (v) Dr. Dilip S. Ramteke -Member
- (vi) Dr. Poonam Kumria -Member
- (vii) Dr. Bharat Jain -Member
- (viii) Dr.SubrataMaity -Member
- (ix) Shri Ashok Agrawal –Member
- (x) Shri Anil Kumar Jha -Member
- (xi) Shri Amardeep Raju-Member Secretary

Dr. Ramana Murthy could not join the meeting

Day 1: 4th December, 2020

Time: 11:00 AM to 05:00 PM

- 39.1. Opening remarks of the Chairman
- 39.2. Confirmation of the minutes of the 38th meeting held on **19 November, 2020** at Indira Paryavaran Bhawan, Jor Bagh Road, New Delhi
- 39.3 Proposal for consideration
- 39.3.1. Proposed manufacturing unit of bulk drugs and intermediates at Plot No. E12, Chincholi MIDC, Taluk Mohol, District Solapur (Maharashtra) by M/s Sree Kartikeya Kameshwari Industries Further consideration of Environmental Clearance

[IA/MH/IND2/110313/2018 dated 14.10.2018] [F. No. 23-130/2018-IA.III]

The Project Proponent and the Accredited Consultant M/s Equinox Environments (I) Pvt. Ltd. made a detailed presentation on the salient features of the project and informed that:

i. The proposal is for Environmental Clearance (EC) to the proposed project of establishment of Bulk Drugs and Intermediates Manufacturing Unit at Plot No. E-12, Chincholi MIDC, Tal:

Mohol, Dist: Solapur, Maharashatra by Sree Kartikeya Kameshwari Industries (SKKI). ToRs has been issued by Ministry vide letter no. 23-130/2018-IA-III (V)dated 20thJuly, 2018.All Bulk Drugs and Intermediates Manufacturing Industry are listed at S.N. 5 (f) of Schedule of Environmental Impact Assessment (EIA) Notification under category 'B'. But due to applicability of **General Condition** i.e. the Great Indian Bustard (GIB) Sanctuary is located within 5 Km of the project area. Hence, the project is appraised at Central Level by Expert Appraisal Committee (EAC) as category A.

- ii. Total plot area acquired by industry is 2.405 Ha.
- iii. Industry will develop an area of 0.88 Ha under green belt during establishment of proposed project which accounts for 36 % of total plot area.
- iv. The estimated cost for proposed project is Rs. 9.5 Crores. Total capital cost earmarked towards environmental pollution control measures is Rs. 2.75 Crores and the Recurring cost (operation and maintenance) will be about Rs. 0.54 Crores per annum.
- v. Total Employment is of 100 persons as direct as well as indirect under proposed SKKI project.Industry proposes to allocate Rs.0.31 Crores @ of 3 % of total investment towards Corporate Environmental Responsibility.
- vi. It is reported as per Form- I, that boundary of Great Indian Bustard (GIB) Sanctuary lies within 5 km distance. River Sina is flowing at a distance of 6 Km in South West direction. Ambient air quality monitoring was carried out at 8locations during February 2018 April 2018 and submitted baseline data indicates that ranges of concentrations of PM₁₀ (42.78 –73.14 μg/m³), PM_{2.5}(10.09 22.80 μg/m³), SO₂ (10.96 30.85 μg/m³) and NO_x (13.58 40.06 μg/m³) respectively. AAQ modeling study for point source emissions indicates that the maximum incremental GLCs after the proposed project would be 2.06μg/m³PM₁₀(on South side), 0.016 μg/m³PM_{2.5}(on South side), 0.612SO₂μg/m³ (on South side) and 0.44 NO_xμg/m³ (on South side). The resultant concentrations are within the National Ambient Air Quality Standards (NAAQS).
- vii. Total water requirement for proposed project will be 208.68 CMD. Out of this,195.68 CMD will be for industrial purpose, 5 CMD for domestic purpose and 8 CMD of gardening. Out of total water requirement 208.68 CMD, 120.3 CMD will be fresh water and 43.38 CMD will be recycled Process water after Distillation, 42 CMD will be treated water from ETP which will be used for industrial processes and 3 CMD will be treated water from STP used for flushing purpose. Water required for proposed operations shall be taken from MIDC water supply scheme.
- viii. The Stream I effluent generated would be to the tune of 49.57M³ / Day. Same comprise of effluent from manufacturing operations viz. process effluent and washing. This effluent will be treated in an ETP comprising of Screen Chamber, OG Removal Tank, Equalization Tank, Flash Mixer, Flocculator, Tube Settler, Holding Tank followed by Triple Effect Evaporator (TEE) and Agitated Thin Film Dryer (ATFD). The condensate from TEE to the tune of 48

M3 / Day would be forwarded to Stream II for treatment. Further salts from TEE would be forwarded to authorized re-processor.

The Stream II effluents generated would be to the tune of 12 M³ / Day, MEE condensate from Stream I of 48 M³ / Day. Stream II effluent shall be contributed by DM back wash, boiler blow down, and cooling blow down. The same will be treated Screen Chamber, OG Removal Tank, Equalization Tank, Flash Mixer, Flocculator, Primary Tube Settler (PTS), MBBR Tank, Secondary Tube Settler (STS), Holding Tank, Filter Feed Tank, Sand and Carbon Filters and R.O. Unit & Sludge dewatering equipment. The treated water from stream II of 42 M³ / Day would be recycled back for cooling make up. The RO reject 18 M³ / Day will be sent to MEE in Stream-I treatment thereby achieving Zero Liquid Discharge (ZLD).

- ix. Power required to the tune of 0.6 MW for the proposed unit would be taken from MSEB grid. Also, two D.G. sets of 250 KVA shall be installed and the same shall be used during power failure only.
- x. Under proposed unit one boiler of capacity 5 TPH each will be installed. Imported Coal to the tune of 30 TPD each will be used as fuel for the same. MDC followed by Bag Filter along with stack of 30 M height each will be installed to the same for controlling the particulate emission. One TFH of each having capacity 8 Lakhs Kcal/Hr will be installed on site. A stack of 18 M height will be installed to the same along with MDC followed by Bag filter as APC.
- xi. Details of Process emissions generation and its management -

Sr. No.	Plant	Process Emissions	Control Equipment	Packing Material used in Scrubber	Scrubber Media	Dia. of Column	Height of Column	Disposal of Scrubbed Media
1. 2. 3.	Column 1 Column 2 Column 3	Nitric Acid	Scrubber	Ceramic Saddles	Water	400 mm	21.5	By- product

xii. Details of Solid waste/ Hazardous waste generation and its management.

Details of Solid waste generated & its management

No	Type of Waste	Quantity	Disposal
1.	Boiler Ash	2 MT/Day	Sold to brick manufacturers for secondary use
2.	Scrap Material	60 MT /Yr	
3.	Office Paper waste	1 MT/Yr	By Sale as scrap
4.	Woven Sack	0.50 MT/Yr	

No	Type of Waste	Quantity	Disposal
	Bag (HDFE)		
5.	Drums	450 Nos. /Yr	

Details of Hazardous waste generated & its management

No.	Type of Waste	Quantity	Disposal
1.	Cat.: 20.3 Distillation Residue	0.7 MT/M	
2.	Cat.: 28.1; Process Residue (Un-reacted)& Waste	2.0 MT/Day	CHWTSDF
3.	Cat.: 34.3; ETP Sludge	0.1MT/Day	
4.	Cat.:34.3; Salts generated from MEE	1.0 MT/Day	Sold to Authorized
			reprocessor

- xiii. Public Hearing for the proposed project has been conducted by the State Pollution Control Board on 29.01.2019 at Jaykumar Patil Udyog Bhavan, Plot No. P-7, MIDC, Solapur Industries, Association Building, MIDC Chincholikati, Tal.: Mohol, Dist.: Solapur. No major issues raised during the public hearing.
- xiv. Details of Certified compliance report submitted by RO, MoEF& CC.

The project site has been inspected and certified by the Regional Officer; MoEFCC, Nagpur during his visit on 28.09.2019 and certification report dated 01.10.2019 was forwarded by the Regional Office to MoEFCC Nagpur.

- xv. Status of Litigation pending against the proposal, ifany: No
- xvi. Following are the list of proposed products:

Details of Products

Sr. No.	Name of Product	Quantity (MT/D)
1	Methyl 2-(4-(4-chlorobutanoyl)phenyl)-2-methylpropanoate	0.5
2	Nicotinic Acid Methyl Ester/Ethyl Ester	0.5
3	Pyridine-3-Carboxyamide(Niacin Amide)	3.5
4	3-Pyridine Carboxylic Acid (NIACIN)	7.68
5	4-Pyridine Carboxylic Acid (ISONIACIN)	0.51
6	2,3 Lutidine& 3,5 Lutidine	0.5
	Total	13.19

Details of earlier appraisal by EAC observation and compliance: Final EIA report was prepared as per ToRs granted and was submitted on online to MOEFCC on 17.07.2017. Thereafter, SKKI EIA was considered in the 27th EAC meeting held on 29.08.2017. During meeting it was informed by SKKI that industry had started construction on site in light of pressure from MIDC towards revoking of plot. In that meeting, the committee directed to submit

the RO; MoEFCC, Nagpur certified status report of construction activity done on site. Subsequently, RO; MoEFCC visited SKKI industry on 02.11.2017 for inspection of construction activity completed on site. After submission of RO report to MoEFCC; SKKI proposal was once again considered in 32nd EAC meeting held on 21.12.2017. During same, it was confirmed by Ministry that the matter involves violation of EIA notification 2006. MoEFCC issued directions to Department of Environment (DOE); Government of Maharashtra on 25.01.2018 to take action for violation of EIA Notification. MoEFCC requested Department of Environment (DOE); Government of Maharashtra (GOM) on 09.03.2018 to direct all concerned for immediate closure of project activities.

Details of Violation:Construction activities started covering an area of nearly 5000 sqm against the total envisaged 9000 sqm with approval of the MIDC and pursuant to the agreement dated 20.10.2020 between MIDC and the project proponent. R.O, Nagpur, MoEFCC on 02.11.2017 visited the site. It has been informed that the MIDC has issued building completion certificate on 27th April 2017 and certified that construction of built up area 5717.78 sqm has alreadybeen completed. However, no production activity was observed during site inspection.

Observations and recommendations of committee in the 27th meeting held on 31st October 2019- 01st November 2019:

PP along with the consultant made the detailed presentation before the EAC and informed that Manufacturing Industry are listed at S.N. 5 (f) of Schedule of Environmental Impact Assessment (EIA) Notification under category 'B' as it is located in the notified Industrial area. But due to applicability of General Condition i.e. the Great Indian Bustard (GIB) Sanctuary is located within 5 Km of the project area, the project is appraised at Central Level by Expert Appraisal Committee (EAC). EAC after detailed deliberation on the information submitted and as presented to the Ministry, deferred the project for want of following information:

- 1. ToR compliance to be submitted and presented before the EAC.
- 2. Public Hearing compliance to the issues raised along with the fund provision with time bound action plan to be submitted.
- 3. Risk Assessment study related to the storage of chemicals and some solvents used in the process and precautionary measures related to the odour.
- 4. Impact of VOCs emitted on flora and fauna, agricultural activities in the nearby area and measures to be taken for their protection.
- 5. Revised damage assessment considering all the environmental attributes and accordingly remediation plan to be submitted.
- 6. Reasons for high concentration levels of VOCs monitored during the monitoring period.
- 7. Monitoring details and analytical procedure adopted for VOCs estimation to be submitted.
- 8. Ultimate analysis of imported Coal used in the boiler to be submitted.
- 9. If briquette are to be used, calorific value along with the ash content to be submitted.
- 10. Layout plan showing the green belt to be submitted.
- 11. Details of proposed green belt to arrest the VoCs.
- 12. Duly filled in Annexures

Observations and recommendations of EAC (violation) in the 31st meeting held on 28th Feb, 2020:

Proponent did not attend the meeting.

Observations and recommendations of EAC (violation)in the 33rd meeting held on 18th -19th May 2020:

Project Proponent along with the consultant made the detailed presentation on the additional information sought in the 27th meeting. EAC after detailed presentation by the PP on the ToR compliance and additional information observed that there are issues which are not addressed properly before the committee and requires further deliberation. EAC therefore after detailed deliberation deferred the project for want of following information:

- i. Please submit the certificate from concerned chief wildlife warden the distance from GIB sanctuary ESZ to proposed Industry along with authenticated map.
- ii. Status of wildlife clearance and copy of minutes of meeting
- iii. Details of inventory of chemicals including hazardous chemicals presently and also at any time along with per day usage shall be submitted. Also submit the detailed safety measures and SOP being implemented during transportation, storage and handling of hazardous chemicals.
- iv. Details regarding safety measures for storing hazardous chemicals and during operational phase and also submit detailed onsite and offsite emergency plan whenever any accident occurs.
- v. Application along with wildlife conservation planfor Conservation of Schedule I species in the study area of the project shall be submitted to the Chief Wildlife warden for approval.
- vi. Air quality prediction modelling with and without control measuresduring construction phase. Stack details of different stacks, i.e. boiler, condensate/solvent recovery unit, and DG set with emission rates of PM10, PM2.5, SO2, NOX, CO and VOCS should be given. How the calibration of VOCs monitoring instrument is done, kindly provide the details.
- vii. Capital cost of the project shall be revised considering land cost and various other components in the project site since as informed by PP the present mentioned has included the common ETP cost
- viii. Details of ETP operation and actual characteristics of Low and High organic load streams along with the characteristics of final treated effluent and skilled manpower dedicated for the operation of the same. Provide the monitoring data of effluent (Raw and Treated) collection system
- ix. Baseline study report related to odour monitoring at the project site and in the study area.
- x. Proof of Credible action initiated.
- xi. Revised damage cost assessment and proposed activities therein as suggested by the Committee specifically during construction and the consumables like water, cement, etc were found to be very much on the lower side and impacts due to total excavation and top soil handling and transport, etc needs to be considered and damage to be assessed and remediation accordingly. Damage assessment shall also consider the shortfall in RWH system to be in place

for the total plot area considering the annual rainfall besides roof RWH system for the already built up area.

- xii. Details regarding total built up area already constructed (%) shall be revised based on the total built up area rather than on Plot area and accordingly damage assessment to be revised,
- xiii. Activity wise EMP capital cost and recurring cost to be submitted, but not include the CER cost in EMP capital cost.
- xiv. Submit activity wise CER cost with phases based on the revised capital cost
- xv. Copy of water allocation by Industrial Estate
- xvi. Detailed Green belt plan already developed and to be developed with type of species.
- xvii. Details of exposure specific health status evaluation of worker.
- xvii. Worst case scenario related to Air and Water in case of Reaction and Reactor failure be given.

Observations and recommendations of EAC (violation) in the 39th (present) meeting held on 04th December 2020:

Information sought by the EAC in the 33rd meeting was submitted to the Ministry on 26.11.2020 and accordingly proposal was considered by the EAC in the present meeting. Project proponent made the detailed presentation before the EAC in the present meeting on the additional information.

EAC after detailed presentation by the PP noted that RO; MoEFCC, Nagpur visited SKKI industry on 02.11.2017 and on 28.09.2019 and certified in his report dated 01.10.2019 that No additional building was constructed after 02.11.2017 and no production activity was observed during site inspection. Further, ESZ of GIB Sanctuary was duly notified by MoEFCC through Notification No. S.O. 654 (E) dated 11.02.2020. Accordingly, Project proponent appraised that Industrial Plot (E-12) is situated outside notified ESZ.

Wild Life Conservation Plan for Schedule-I species has been prepared and submitted to concerned Chief Wildlife Warden. EAC also noted that PP has now submitted the Revised Remediation, Natural and Community Resource Augmentation Plan with budgetary provision of Rs 80.78 lakhs and credible action u/s 19 of E(P) Act is yet to start against the project proponent. EAC after detailed deliberation advised Project Proponent to reduce the activities proposed under the remediation plan and submit it activities before finalization of minutes of meeting. As per the suggestion of EAC, PP submitted the revised activities.

EAC after detailed deliberation on the information submitted by the PP (EIA/EMP report, PH issues, Form 2, Additional information, Annexure etc), **recommended** the proposal for grant of Environmental Clearance subject to the compliance of the following Specific conditions in addition to all Standard conditions applicable for such projects:

i. EAC recommended for an amount of Rs 80.78 Lakhs towards Remediation plan and Natural and Community Resource Augmentation plan to be spent within a span of three years. The details are given on next page:

Remediation Plan and Budgetary Provisions

S.No	Environmental	Amount			ıkup
	Component		1 st Year	2 nd Year	3 rd Year
1	Air Environment				
	Plantation in 3 Villages	Rs.18,03,000	Rs.10,00,000	Rs.8,03,000	
	Chincholikati,				
	Akolekati&Kondi				
	Total (1)	Rs.18,03,000	Rs.10,00,000	Rs.8,03,000	
2	Water Environment				
	Providing Sanitation	Rs.15,50,000	Rs.10,00,000	Rs.5,50,000	
	facilities in Darfal&Kondi				
	Villages				
	Total (2)	Rs.15,50,000	Rs.10,00,000	Rs.5,50,000	
3	Noise Environment				
	Financial Assistance for	Rs.50,000	Rs.50,000		
	COVID-19 Infrastructure in				
	Study Area Villages namely				
	Mohitewdi&Gulwanchi				
	Total (3)	Rs.50,000	Rs.50,000		
4	Biological Environment				
	(Ecology)	B 7.50.000		D 2 00 000	D 4.50.000
	Fund allocation to DCF,	Rs.7,50,000		Rs.3,00,000	Rs.4,50,000
	Solapur for Conservation of				
	GIB Sanctuary	Da 7 50 000		Da 2 00 000	Da 4 50 000
5	Total (5) Solid and Hazardous	Rs.7,50,000		Rs.3,00,000	Rs.4,50,000
3	Waste				
	Solid Waste Management in	Rs.75,000		Rs.25,000	Rs.50,000
	3 Villages namely, Pakni,				
	Kondi&Darfal				
	Total (6)	Rs.75,000		Rs.25,000	Rs.50,000
6	Energy Consumption				
	Installation of 5 KW Solar	Rs.6,00,000	Rs.6,00,000		
	Photovoltaic Power				
	Generation System at				
	Chincholikati Village	D (00.000	D (00.000		
	Total	Rs.6,00,000	Rs.6,00,000	D _~ 1(70 000	D. 5 00 000
	Total	Rs.	Rs.26,50,000	Rs.16,78,000	Rs.5,00,000
		48,28,000			

Community Resource Augmentation Plan and Budgetary Provisions

No.	Description	Cost	1 st Year	2 nd Year	3 rd Year
1	Providing Sanitation facilities	Rs.10,00,000	Rs.10,00,000		
	in Chincholikati Village				
	Comprising of community				
	Toilet Unit (1 No. / Village);				
	The Unit consisting of 6 Seats				
	(3 ladies & 3 Gents), with 500				
	Liter water tank, Septic tank,				
	Piping etc. complete. 1 Units				
	X Rs. 10 Lakhs / Unit = Rs. 10				
	Lakhs				
2	Medical check-up camp in	Rs.2,00,000		Rs.1,00,000	Rs.1,00,000
	nearby areas for villagers				
3	Awareness camps for GIB	Rs.2,00,000	Rs.1,00,000	Rs.1,00,000	
	Sanctuary Conservation				
	Total	Rs.14,00,000	Rs.11,00,000	Rs.2,00,000	Rs.1,00,000

Natural Resources Augmentation Plan and Budgetary provisions

No.	Description	Cost	1 st Year	2 nd Year	3 rd Year
1	• Plantation of indigenous &	Rs. 7,50,000	Rs.3,75,000	Rs.3,75,000	
	evergreen tree species with				
	appropriate canopies & proper				
	leaves (shapes & sizes) for				
	dust and other gaseous				
	pollutants' control as well as				
	noise attenuation in 2 Study				
	Area villages.				
	• The trees shall be planted				
	along road sides (avenue				
	plantation), in the premises of				
	Public Buildings (shelter belt				
	plantation) as well as on				
	community lands (mass				
	plantation) at 2 villages.Cost				
	of Plantation Program in				
	above villages shall be – 2				
	Villages X 500 Trees/ Village				
	X Rs. $750/-$ per Tree = Rs.				
	7.50 Lakhs				
2	• Providing Solar Photovoltaic	Rs.6,00,000		Rs.3,00,000	Rs.3,00,000
	Street Lights comprising of				
	MS Pole, Solar Panel, LED				
	lamp, Battery, wiring etc.				

	 complete The Street Lights shall be provided in 2 Villages. Cost of Lighting Program in above villages shall be - 2 Villages X 10 Street Lights / Village X Rs. 30,000/- per No.= Rs.6 Lakhs 				
3	 Providing Safe Drinking Water Units comprising of Filtration, RO Module with Coin Dispenser & Storage Tank, electrical panel etc. complete (Dispensing Capacity of 500 Lit/Hr.) 2 Units shall be provided in 2 Villages. Cost- 2 Units X Rs. 2.5 Lakhs = Rs. 5 Lakhs 	Rs.5,00,000	Rs.2,50,000	Rs.2,50,000	
	Total	Rs.18,50,000	Rs.6,25,000	Rs.9,25,000	Rs.3,00,000

Summary of Cost

No.	Description	Cost in Rs. Lakhs			
		Total Cost	1 st Year	2 nd Year	3 rd Year
1	Remediation Plan	48.28	26.50	16.78	5.00
2	Natural Resources Augmentation Plan	18.50	6.25	9.25	3.00
3	Community Resources Augmentation Plan	14.00	11.00	2.00	1.00
	Total Cost	Rs.80.78	Rs.43.75	Rs.28.03	Rs.9.00

- i. Total budgetary provision with respect to Remediation plan and Natural & Community Resource Augmentation plan is Rs80.78 lakhs. Therefore, project proponent shall be required to submit a bank guarantee of an amount of Rs. 80.78 lakhs towards Remediation plan and Natural and Community Resource Augmentation plan with the SPCB prior to the grant of EC.
- ii. Remediation plan shall be completed in 3 years whereas bank guarantee shall be for 5 years. The bank guarantee will be released after successful implementation of the remediation plan and Natural and Community Resource Augmentation Plan, and after the recommendation by regional office of the Ministry, Expert Appraisal Committee and approval of the Regulatory Authority.

- iii. Credible action to be initiated and Court case shall be filed by the concerned SPCB against the Project Proponent u/s 19 of the E(P) Act. 1986.
- iv. Approval/permission of the CGWA/SGWA shall be obtained before drawing ground water for the project activities, if applicable. State Pollution Control Board (SPCB) concerned shall not issue Consent to Operate (CTO) till the project proponent obtains such permission.
- v. Preventive measures to be taken to control ignition sources in bulk storage area and fire protection system to be established above ground storage tanks. Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done.
- vi. Proper precautions to be taken to prevent inadvertent mixing of chemicals. Standard operating procedures to be strictly followed during handling of chemicals.
- vii. Solvents shall be stored in a separate space specified with all safety measures. Project Proponent shall keep inventory of solvents and fuel not more than five days. Sensors for odours will be installed at sensitive locations.
- viii. Project Proponent to ensure proper disposal of Hazardous wastes.
 - ix. Project Proponent shall create green belt (peripheral plantation) as per guidelines of MoEF.
 - **x.** Project Proponent shall undertake Odour Monitoring base line study (odour unit=OUe/m3)-odour concentration and mitigation measures while operating the plant and this report shall be submitted within three months to MOEF.
- 39.3.2. Expansion of Sugar Factory from 5,000 TCD to 10,000 TCD by M/s DeshbhaktRatnappaKumbharPanchgangaSahakariSakharKarkhana Ltd. (D.B.R.K. Panchganga S.S.K. Ltd.) leased unit of M/s Shree Renuka Sugars Ltd. (SRSL) 22 located at Ganganagar, Ichalkaranji, Taluka Hatkanangale, District Kolhapur, Maharashtra- regarding fresh Environmental Clearance

[Proposal No. IA/MH/IND2/153135/2000] [F. No. IA-J-11011/116/2017- IA-II(I)]

The Project Proponent and the Accredited Consultant M/s.Equinox Environments (I) Pvt. Ltd. made a detailed presentation on the salient features of the project and informed that:

- i. The proposal is for Environmental Clearance (EC) to the Expansion of Sugar factory from 5000 to 10,000 TCD by M/s. Deshbhakt Ratnappa Kumbhar Panchganga Sahakari Sakhar Karkhana Ltd., (DBRKPSSKL) leased unit to Shree Renuka Sugars Ltd., at Gat No. 29, Ganganagar, Ichalkaranji, Tal.: Hatkanangale, Dist.: Kolhapur, Maharashtra.
- ii. Standard ToRs has been issued by Ministry vide letter F. No. IA-J-11011/116/2017/-IA II (I) dated 12.02.2020.

- iii. All Sugar factories are listed at S.N. 5 (j) of Schedule of Environmental Impact Assessment (EIA) Notification. Accordingly, the said project comes under Category B and requires appraisal at State Level. But due to applicability of General Condition i.e. industrial site located at 4.8 Km from Maharashtra Karnataka Inter State Boundary, project appraised at Central level.
- iv. Approval for existing 5000 TCD sugar factory was obtained in year 1978. The CTO for 5000 TCD dated 08.11.2000 which was issued prior to EIA notification No. S. O. 1533 (E) dated 14.09.2006. This means 5000 TCD industry does not attract any requirement of EC under EIA notification of 2006.
- v. Total plot area is 59.4 Ha. Out of this total built up area is 20.57 Ha.
- vi. Under existing setup of DBRKPSSKL an area of 1,36,600 Sq.M. is under green belt which is 23% of total plot area. Thereunder, about 1711 no. of big trees have been planted. Further, an area of 59,635Sq.M. will be developed under additional green belt development plan & about 27,724 no. of trees shall be planted in phasewise manner.
- vii. The estimated project cost is Rs. 290.0 Cr. including existing investment of Rs. 210 Cr. Total capital cost earmarked towards environmental pollution control measures is Rs. 4.9 Crores and the Recurring cost (operation and maintenance) will be about Rs. 0.83 Crores per annum.
- viii. Total employment will be 119 persons as direct and 521 persons indirect after expansion. Industry proposes to allocate Rs. 1.075 Cr. towards Corporate Environmental Responsibility (CER) as per Ministry OM dated 1st May, 2018.
- ix. There are no national parks, wildlife sanctuaries, Biosphere Reserves, Tiger/Elephant Reserves, Wildlife Corridors etc. within 10 km distance from the project site. River Panchganga flows at 4.8 Km from project site.
- x. Ambient air quality concentration ranges are- PM_{10} 52.8 to 66.3 $\mu g/M^3$, $PM_{2.5}$ 18.3 to 24.8 $\mu g/M^3$, SO_2 30.2 to 41.6 $\mu g/M^3$ and NO_x 38.4 to 55.6 $\mu g/M^3$ respectively. AAQ modeling study for point source emissions indicates that the maximum incremental GLCs after the expansion will be $0.219\mu g/m^3$ PM_{10} (on W side), 0.0525 $\mu g/m^3$ $PM_{2.5}$ (on W side), 1.14 SO_2 $\mu g/m^3$ (on W side) and 0.696 NO_x $\mu g/m^3$ (on W side). The resultant concentrations are within the National Ambient Air Quality Standards (NAAQS).
- xi. The total water requirement after expansion of sugar factory will be 3405 CMD. From this, 93 CMD fresh water will be used for domestic use. About 2280 CMD will be used for industrial use and 1095 CMD for Green Belt purpose; met from cane condensate (100% recycle). Fresh water will be taken from river Panchganga.
- xii. Total domestic effluent generated @ 75 CMD, will be treated in proposed Sewage Treatment Plant (STP) and the treated effluent shall be reused for flushing in toilets & gardening.

Total trade effluent generated after expansion will be 890 CMD; same to be treated in existing ETP having primary & secondary treatment units. Treated water from ETP along with excess cane condensate will be used for green belt development in own sugar factory complex(19.62 Ha)

Existing set up now comprises of primary treatment for oil & grease removal through traps & flotation tanks. Thereafter, comprehensive secondary anaerobic treatment (suspended growth type) is given in one RCC tank (4680 Cu. M.) followed by aerobic treatment (suspended growth type) in diffused air aeration tank (2112 Cu.M.). Thereafter, the secondary clarifier unit removes biological flocs & sludge which go to SDBs and overflow from the weir goes to a treated water storage tank (1200 Cu.M.). From here the treated effluent is supplied for irrigation. A state of art OCMS (online continuous monitoring system) is fitted to the ETP infrastructure.

Under expansion project; there is planning of provision of - (1) advanced secondary treatment through an additional MBBR based diffused air aeration tank (1750 Cu.M.), and (2) tertiary treatment through PSF and ACF. Always, the ETP is commissioned one month before crushing season for development of culture adequately & appropriately.

- xiii. Total 11.3 MW Power will be required, will met through in-house 30 MW cogeneration plant.
- xiv. No additional boiler will be installed under expansion unit, since, steam required for additional activities will be taken from existing boiler of 140 TPH. Bagasse @ 63.6MT/Hr is used as fuel. ESP (3 Field) is provided as APC & stack of 75 M height.
- xv. Details of Process emissions generation and its management No process emission are generated.
- xvi. Details of Solid waste/ Hazardous waste generation and its management.

Details of Solid waste generated & its management

Unit	Type	Existing	After Expansion	Disposal
Sugar Factory & Co-gen Plant	Boiler Ash (Bagasse)	18.0 MT/D	21.6 MT/D	Used as manure / sale to bricks manufacturers
Co-gen Plant	ETP sludge	2.5 MT/Yr.	3.5 MT/Yr.	Used as manure

Details of Hazardous waste generated & its management

Unit	Type	Existing	After Expansion	Disposal
Sugar Factory & Co-gen Plant	5.1- Spent Oil	2.5 MT/Yr.	5 MT/Yr.	Burnt in boiler alongwith bagasse

5.2- Resi	due Oil 2.5 MT/Yr.	5 MT/Yr.	To CHWTSDF	
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xvii. As per ToR letter dated 12.02.2020 Public Hearing (PH) for the project exempted since earlier conducted on 04.09.2018.

Major issues raised in PH are-

are enclosed at Appendix- D of EIA report. .

- 1. Generation of high noise from boiler- is generated during release of steam from safety valves of warm up vent steam line for turbine, boiler start-up valves, super heater safety valve, steam blow off safety valve & during grid failure which is not a continuous source of noise. Subsequent to public hearing, the steam released from these safety valves is now being passed through steam silencer installed in turbine & boiler sections. Due to installation of steam silencers there is reduction of noise up to 65-70 dB(A). Rs. 22 Lakh have been spent towards installation of steam silencers in December 2018.
- 2. Air pollution & fugitive dust emissions A commitment was given by the management of DBRKPSSKL during public hearing regarding installation of Third Field to ESP for further reducing stack emissions due to improvement in efficiency of pollution control equipment. Accordingly, the ESP is fitted with third field in the year 2018; which has resulted in to further reduction of air pollutants from 90 mg/Nm³ to 35 mg/Nm³. About Rs. 1.5 Crore spent on installation of Third Field to ESP.
- 3. Management further have decided to shift Bagasse yard & conveyor to the area available with the industry; from where residential area is significantly away. Layout plan showing proposed bagasse yard & its conveyor area which is approved by factory inspector is enclosed at Appendix-N of EIA report. Further, google image showing existing & proposed location of bagasse conveyor is also appended therewith. Expenses of Rs. 2.0 Cr shall be incurred towards bagasse yard & conveyor shifting work.
- 4. Traffic due to vehicle transportation- Major concern was raised by locals regarding traffic management on internal road passing adjacent to industry from south direction. Earlier single road was used for movement of all vehicles i.e. single route for in & out.

 Presently, cane transportation through the road passing from colony/ residential area was stopped & alternate route is in operation. This will reduce problems due to transportation. A detailed plan of Traffic Management & google images showing earlier transportation routes & alternate routes
- xviii. Approval for existing 5000 TCD sugar factory was obtained in year 1978 and CTO was granted for 5000 TCD dated 08.11.2000 prior to the EIA notification No. S. O. 1533 (E) dated 14.09.2006 therefore 5000 TCD industry does not attract requirement of EC under EIA notification of 2006. A 30 MW Cogen unit granted EC from SEIAA, DoE, Maharashtra vide no. SEAC 2009/CR16/TC2 dated 18.11.2009.
- xix. Status of Litigation pending against the proposal, if any: MPCB have initiated court case against Sugar Factory for excess cane crushing (from 5000 TCD to 5500 TCD) done in year 2015-2016 on 13.12.2016 vide Application No.132/2016; pending at the court.

xx. Following are the list of proposed products:

Details of Products

Industrial unit	Product	UoM	Quantity	
			Existing	Total after
				Expansion
Sugar Factory	Sugar (12-13%)*	MT/D	650	1300
	Molasses (4-5%)*	MT/D	225	450
	Bagasse (30%)*	MT/D	1500	3000
	Press Mud (4-5%)*	MT/D	200	400
Co-Gen	Electricity	MW	30	30
Distillery	Rectified Spirit	KL/D	45	45
	Fusel Oil	KL/D	0.025	0.025

- xxi. Court case pending for violation of the environmental laws: Subsequently, renewal consent application (5000 TCD) was considered by MPCB in CAC meeting on 16.12.2016 & directed to submit BG for Rs. 25 Lakhs & Board Resolution for not carrying out excess crushing without procurement of EC. Thereafter, BG & Board Resolution was submitted and renewed consent was procured dated 19.05.2017. After submission of BG, immediate steps were taken by industry for procurement of EC and submitted Form-1 to MoEFCC on 02.03.2017. Similarly, as per MoEFCC protocol & procedures, industry have stopped excess crushing since 2017 till date as well as legal action is also initiated by MPCB. Moreover, industry has submitted BG for Rs. 25 Lakhs and the Board Resolution for not repeating the violation to MPCB. Taking Cognizance of EMP Implemented & Performance of Industry; on 24.10.2019 MPCB released Rs. 25 Lakhs BG against Excess Crushing.
- xxii. Details of earlier EC, if any and compliance thereof: Approval for existing 5000 TCD sugar factory was obtained in year 1978. CTO for 5000 TCD dated 08.11.2000 was issued prior to the EIA notification No. S. O. 1533 (E) dated 14.09.2006. A 30 MW Cogen unit granted EC from SEIAA, DoE, Maharashtra vide no. SEAC 2009/CR16/TC2 dated 18.11.2009.
- xxiii. **Details of earlier appraisal by EACobservation and compliance:**Initially, the Form I application for expansion of sugar factory from 5000 to 10,000 TCD was submitted to EAC (Ind. 2) MoEFCC; New Delhi on 03.01.2018. Accordingly, ToRs were granted on 22.02.2018 & Public Hearing (PH) was conducted on 04.09.2018 with final EIA submission on 13.11.2018. During the case consideration in 1st EAC meeting on 20.12.2018, the industry informed about excess crushing happened (beyond consented limit of 5000 TCD) during year 2015-16 & 2016-17. On this, after detailed deliberation during the EAC meeting, a decision was given that the case comes under violation as per MoEFCC notification No. S.O. (E) 804 dated 14.03.2017 (as amended on 08.03.2018). Accordingly, the case was transferred by EAC (Ind. 2) to EAC Violation of MoEFCC; New Delhi. In due course, ToRs under violation were issued to the industry on 12.02.2020 while exempting from conducting PH once again; which were in addition to the earlier ToRs granted by EAC (Ind. 2). In line with the earlier ToRs as well as the ToRs under violation, the EIA report has been prepared & submitted.

Observation and recommendation of the EAC (violation) in the earlier meetings

Proposal for EC was earlier considered in the 36th EAC meeting held during 21-22nd September 2020. PP alongwith the Consultant made the detailed presentation before the EAC on the project proposal. EAC noted that approval for existing 5000 TCD sugar factory was obtained in year 1978 and CTO was granted for 5000 TCD dated 08.11.2000 prior to the EIA notification No. S. O. 1533 (E) dated 14.09.2006 therefore 5000 TCD industry does not attract requirement of EC under EIA notification of 2006. A 30 MW Cogen unit granted EC from SEIAA, DoE, Maharashtra vide no. SEAC 2009/CR16/TC2 dated 18.11.2009.

EAC (violation) noted that application for expansion of sugar factory from 5000 to 10,000 TCD was submitted to EAC (Ind. 2) MoEFCC; New Delhi on 03.01.2018. Accordingly, ToRs were granted on 22.02.2018 & Public Hearing (PH) was conducted on 04.09.2018 with final EIA submission on 13.11.2018. During the case consideration in 1st EAC (Industry sector) meeting on 20.12.2018, excess crushing (beyond consented limit of 5000 TCD) during year 2015-16 & 2016-17 was noted. On this, after detailed deliberation during the EAC meeting, a decisions was given that the case comes under violation as per MoEFCC notification No. S.O. (E) 804 dated 14.03.2017. In due course, ToRs under violation were issued to the industry on 12.02.2020 while exempting the repeat PH.

EAC (violation) deliberated on the information submitted (EIA/EMP report, PH issues, Compliance report, Form 2, Annexures etc) and as presented. The EAC in its 36th meeting after detailed deliberation deferred the project for want of following information:

- 1. Details of green belt shall be submitted.
- 2. Application for approval of wildlife conservation plan shall be submitted to the competent authority and copy of the same shall be submitted.
- 3. Documents for use of land for industrial purpose and permission for use of water from the river for domestic use.
- 4. Details of ZLD to be submitted along with water balance.
- 5. CTE and CTO granted so far for 5000 TCD
- 6. Year wise production detail since inception of operation.
- 7. Revised traffic density using impact prediction modelling to be submitted.
- 8. Status of credible action u/s 19 of E(P) Act.
- 9. Revised damage assessment cost and rework on the activities proposed under the RP, NRA and CRA as per the requirement of local villages and issues raised during public hearing.
- 10. Details of colony,water consumption,solidwaste disposal and energy conservation and related assessment of damage.
- 11. Greenbelt Development & Ecology Restoration programme with budgetary provisions (for the 1st two years) to mitigate the Predicted impacts.

Observations and recommendations of EAC (violation) in the 39th (present) meeting held on 04th December 2020

Information sought by the EAC in the 36th meeting was submitted online to the Ministry vide letter dated 25.11.2020 and accordingly proposal was considered by the EAC in the present meeting. Project proponent made the detailed presentation before the EAC in the present meeting on the additional information. EAC after detailed presentation by the PP noted that Wildlife Conservation Plan for Schedule-I species has been prepared & submitted to CWW, Nagpur on 27.02.2020 for approval. MPCB have initiated court case against Sugar Factory for excess cane crushing (from 5000 TCD to 5500 TCD) done in year 2015-2016 on 13.12.2016 vide Application No.132/2016. EAC also noted that PP has now revised the Damage Assessment Cost and rework on the activities proposed under the RP, NRA and CRA however EAC opined that some of the proposed activities are not monitorible and quantifiable, therefore EAC advised PP to revise the same as suggested and submit to the Members by email before minutes are finalized. As suggested by the EAC, PP through email circulated the revised activities under remediation plan to EAC members.

EAC after detailed deliberation on the information submitted by the PP (EIA/EMP report, PH issues, Form 2, Additional information, Annexure etc), **recommended** the proposal for grant of Environmental Clearance subject to the compliance of the following Specific conditions in addition to all Standard conditions applicable for such projects:

i. EAC recommended for an amount of Rs 232.57 Lakhs towards Remediation plan and Natural and Community Resource Augmentation plan to be spent within a span of three years. The details are given below:

Remediation Plan and Budgetary Provisions

No	Environmental Component	Amount	Year wise Cost Breakup		
			1 st Year	2 nd Year	3 rd Year
1	Air Environment				
a	Donation of Ambulance to Govt. promoted COVID- 19 Centre of Ichalkarnji Town.	Rs.5,35,000	Rs.5,35,000		
b	Plantation in 4 Villages Tilwani, Sajani, Mangaonwadi&Mangaon	Rs.62,50,000	Rs.35,00,000	Rs.27,50,000	
	Total	Rs.67,85,000	Rs.40,35,000	Rs.27,50,000	
2	Water Environment				
a	Safe Drinking Water Supply Facilitycomprising of - Bore well, RO Plant Module,Piping& Filtration System with Metering & Dispensing arrangement in a closed Shed at 2 Villages	Rs.10,25,000	Rs.5,12,500	Rs.5,12,500	

	of the Study Area at Kabnoor and Korochi.				
b	Provision of STP at Panchaganga English School, New Jain Mandir, Korochi, Ichalkarnji, Kolhapur, Maharashtra.	Rs.10,00,000		Rs.10,00,000	
	Total	Rs.20,25,000	Rs.5,12,500	Rs.15,12,500	
3	Noise Environment				
a	Financial Assistance for COVID-19 Infrastructure in Study Area Villages namely Kabnur, Tilawni&Korochi - PPEs to Health Workers & Doctors, Masks, Face Shields, Sanitizers, Handgolves& Basic Medicines.	Rs.4,44,000	Rs.4,44,000		
	Total	Rs.4,44,000	Rs.4,44,000		
4	Land Environment				
a	Organic Manure Supply in 5 villages (Tilawni, Kabnoor, Korochi, chandoor&Rui) Farmers having Low sugarcane cultivation farm lands.	Rs.12,50,000	Rs.5,00,000	Rs.4,00,000	Rs.3,50,000
	Total	Rs.12,50,000	Rs.5,00,000	Rs.4,00,000	Rs.3,50,000
5	Ecology				
a	Afforestation in 5 Villages of Study Area at Kabnoor, Korochi, Chandoor, Rui, Yadrav.	Rs.63,00,000	Rs.40,00,000	Rs.23,00,000	
	Total	Rs.63,00,000	Rs.40,00,000	Rs.23,00,000	
6	Solid & Hazardous Waste				
a	Donation of 6 Nos. MSW Collection & Transportation Vehicles(Mini – Tempo type) with separate	Rs.16,63,000	Rs.8,31,500	Rs.8,31,500	

	compartments for Dry & Wet Waste and Public Addressing system& GPS.				
	Total	Rs.16,63,000	Rs.8,31,500	Rs.8,31,500	
7	Socio-Economy				
a	Health Check-Up Camps in villages namely Korochi, Chandoor, Tilawani, Kabnur/ Providing First Aid Kits to Panchaganga English School / Veterinary health Checkup.	Rs.4,90,000	Rs.3,50,000	Rs.1,40,000	
b	Donation to schools- VC Equipment& Accessories to Panchaganga English School, Near New Jain Mandir, Korochi, Ichalkarnji, Kolhapur, Maharashtra.	Rs.4,00,000	Rs.4,00,000		
	Total	Rs.8,90,000	Rs.7,50,000	Rs.1,40,000	
	Grand Total	Rs.1,93,57,000	Rs.1,10,73,000	Rs.79,34,000	Rs.3,50,000

Natural Resources Augmentation Plan and Budgetary provisions

No.	Description	Cost	1 st Year	2 nd Year	3 rd Year
1	• Plantation of indigenous &	Rs.	Rs.	Rs. 2,50,000	
	evergreen tree species with	5,00,000	2,50,000		
	appropriate canopies & proper				
	leaves (shapes & sizes) for dust				
	and other gaseous pollutants'				
	control as well as noise				
	attenuation in 2 Study Area				
	villages.				
	• The trees shall be planted along				
	road sides (avenue plantation), in				
	the premises of Public Buildings				
	(shelter belt plantation) as well as				
	on community lands (mass				
	plantation) at villages namely				
	Nej&Alate. Cost of Plantation				
	Program in above villages shall				
	be – 2 Villages X 500 Trees/				

	Village X Rs. 500/- per Tree =				
	Rs. 5.00 Lakhs				
2	• Providing Solar Photovoltaic	Rs.		Rs. 3,00,000	Rs.
	Street Lights comprising of MS	6,00,000		, ,	3,00,000
	Pole, Solar Panel, LED lamp,				
	Battery, wiring etc. complete				
	• The Street Lights shall be				
	provided in 2 Villages namely				
	Korochi&Kabnur				
	• Cost of Lighting Program in				
	above villages shall be - 2				
	Villages X 10 Street Lights /				
	Village X Rs. 30,000/- per No.=				
	Rs.6 Lakhs				
3	• Providing Safe Drinking Water	Rs.	Rs.	Rs. 5,00,000	
	Units comprising of Filtration,	10,00,000	5,00,000		
	RO Module with Coin Dispenser				
	& Storage Tank, electrical panel				
	etc. complete (Dispensing				
	Capacity of 500 Lit/Hr.)				
	• 4 Units shall be provided in				
	Korochi&KabnurVillages.				
	• Cost- 4 Units X Rs. 2.5 Lakhs =				
	Rs. 10 Lakhs				
	Total	Rs.	Rs.	Rs.	Rs.
		21,00,000	7,50,000	10,50,000	3,00,000

Community Resource Augmentation Plan and Budgetary Provisions

No.	Description	Cost	1 st Year	2 nd Year	3 rd Year
1	Providing Sanitation facilities	Rs.10,00,000	Rs.10,00,000		
	in 1 Villages Comprising of				
	community Toilet Unit (1 No. /				
	Village); The Unit consisting				
	of 6 Seats (3 ladies & 3 Gents),				
	with 500 Litre water tank,				
	Septic tank, Piping etc.				
	complete. 1 Units X Rs. 10				
	Lakhs / Unit = Rs. 10 Lakhs				
2	Medical check-up camp in 3	Rs. 2,00,000		Rs.1,00,000	Rs.
	villages namely Kabnoor, Rui,				1,00,000
	Yadrav for villagers				
3	Training to the farmers in 3	Rs. 3,00,000	Rs.1,00,000	Rs.1,00,000	Rs.1,00,000
	villages Nej, Alate&Chandoor				
	villages on advance agriculture				
	/ irrigation practices and water				

	conservation				
4	Utilization of Amount of	Rs. 3,00,000	Rs.1,00,000	Rs.1,00,000	Rs.1,00,000
	Economic Benefit derived out				
	of Violation -Financial				
	Assistance for COVID-19				
	Infrastructure in 3 Study Area				
	Villages namely Kabnur,				
	Yadrav&Tilawani like - PPEs				
	to Health Workers & Doctors,				
	Masks, Face Shields,				
	Sanitizers, Handgolves&Basic				
	Medicines.				
	Total	Rs.18,00,000	Rs.	Rs.3,00,000	Rs.3,00,000
			12,00,000		

Summary

No.	Description	Total Cost in	Year wise Cost Br		eakup
		Rs. Lakhs			
			1 st Year	1 st Year	1 st Year
1	Remediation Plan	Rs. 193.57	Rs.	Rs. 79.34	Rs. 3.50
			110.73		
2	Natural Resources Augmentation Plan	Rs. 21.00	Rs. 7.50	Rs.10.50	Rs. 3.00
3	Community Resources Augmentation	Rs.18.00	Rs. 12.00	Rs.3.00	Rs. 3.00
	Plan inclusive of Economic Benefit				
	derived out of Violation				
	Total Cost	Rs.232.57	Rs.	Rs. 92.84	Rs. 9.50
			130.23		

- **ii.** Total budgetary provision with respect to Remediation plan and Natural & Community Resource Augmentation plan is Rs. 232.57 lakhs. Therefore, project proponent shall be required to submit a bank guarantee of an amount of Rs. 232.57 lakhs towards Remediation plan and Natural and Community Resource Augmentation plan with the SPCB prior to the grant of EC.
- **iii.** Remediation plan shall be completed in 3 years whereas bank guarantee shall be for 5 years. The bank guarantee will be released after successful implementation of the remediation plan and Natural and Community Resource Augmentation Plan, and after the recommendation by regional office of the Ministry, Expert Appraisal Committee and approval of the Regulatory Authority.
- iv. Approval/permission of the CGWA/SGWA shall be obtained before drawing ground water for the project activities, if applicable. State Pollution Control Board (SPCB)

- concerned shall not issue Consent to Operate (CTO) till the project proponent obtains such permission.
- v. Parking Area shall be developed with paved floor in stages over a period of 3 years to reduce the fugitive emission.

39.4 Discussion on any other item with permission of the Chair
