

ANNEXURE - II

No.EO/ /22

Dt:

To,

The Senior Environmental Officer  
Karnataka State Pollution Control Board,  
"Parisar Bhavan", 1<sup>st</sup> to 5<sup>th</sup> Floors,  
#49, Church Street,  
Bangalore-560001.

Sir,

**Sub: Compliance with Consent Status reg...**

Ref:1) Combined Consent order No.AW-305678 Dtd: 02/04/2018.

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With reference to the subject and reference cited above, we would like to submit the following point wise consent compliance Status for your kind consideration.

Terms & Conditions.

S.No.	Consent	Status
<b>A.</b>	<b>TREATMENT AND DISPOSAL OF EFFLUENTS UNDER THE WATER ACT.</b>	
1	The Discharge from the premises of the occupier shall pass through the terminal manhole/manholes where from the Board shall be free to collect samples in accordance with the provisions of the Act/Rules made there under.	We have provided terminal manhole for collection of treated effluent samples.
2(b)	The treated sewage effluent discharged shall conform to the standards specified in Annexure-I.	The treated effluent is meeting the consent standards.
3(a)	The trade effluent generated in the industry shall be treated in the ETP and treated effluent shall conform to the standards stipulated by the Board in Annexure-I	Yes, sugar factory effluent is treated in full pledged ETP consisting of primary treatment plant (screen, oil & Grease Traps and 'V' Notch). And for cogeneration plant effluent is treated by neutralization cum settling. The treated effluent is meeting the standards by the board.

4	The applicant shall install flow measuring/recording devices to record the discharge quantity and maintain the record.	Provided 'V' Notch for measuring the effluent quantity.
5	The applicant shall not change or alter either the quality or the quantity or the place of discharge or temperature or the point of discharge without the previous consent/ permission of the Board.	Yes, we are following the instructions.
6	The applicant shall not allow the discharge from the other premises to mix with the discharge from his premises. Storm water shall not be allowed to mix with the effluents on the upstream of the terminal manhole where the flow measuring devices are installed.	Storm water is separately collected and is not allowed to mix with trade effluent.
7	The daily quantity of domestic effluent and trade effluent from the industry shall not exceed the limits as indicated in this consent order.	Yes, strictly followed.
8	The applicant shall discharge the effluents only to the place mentioned in the consent order and discharge of treated/untreated outside the premises is not permitted.	Yes, strictly followed.
<b>B</b>	<b>EMISSIONS:</b>	
1	The discharge of emissions from the premises of the applicant shall pass through the air pollution control equipment and discharges through stacks/chimneys mentioned in Annexure-II where from the Board shall be free to collect the samples at any time in accordance with the provisions of the Act and Rules made there under. The tolerance limits of the constituents forming the emissions in each of the stacks shall not exceed the limits laid down in annexure-II.	As per annexure-II the emissions are passing through stacks/chimneys only.
<b>D.</b>	<b>MONITORING &amp; REPORTING</b>	
1	The applicant shall get the samples of effluents & emissions collected and get them analyzed once a month/either by in house monitoring laboratory or through EP /approved laboratories for the parameters as indicated in Annexure-I & II.	Monthly monitoring results are submitted regularly to Regional office, Chikkodi.
2	The applicant shall maintain log books to reflect the working condition of pollution control systems and also self monitoring results and keep it open for inspection.	Yes, Log books are maintained.

E	<b>SOLID WASTE (OTHER THAN HAZARDOUS WASTE) DISPOSAL.</b>	
1	The applicant shall segregate solid waste from hazardous waste, municipal solid waste and store it properly till treatment/disposal without causing pollution to the surrounding Environment.	The only Hazardous waste generated is spent oil which is mixed with bagasse and burnt in Boiler. Non Hazardous waste is composted.
2	The solid waste generated shall be handled & disposed by scientific method without causing eye sore to the general public and to the surrounding environment.	All the non Hazardous solid waste is used for composting.
F.	<b>NOISE POLLUTION CONTROL</b>	
1	The applicant shall ensure that the ambient noise levels within its premises shall not exceed the limits i.e. 75 dB(A) Leq during day time and 70 dB(A) Leq during night time as specified in under the Air (prevention and Control of Pollution) Act, 1981.	Noise levels are meeting the standards.
G.	<b>HAZARDOUS AND OTHER WASTES (MANAGEMENT &amp; TRANS BOUNDRY MOVEMENT) Rules 2016:</b>	
1	The applicant shall comply with the provisions of the Hazardous and other Wastes (Management & Trans boundary movement) Rules 2016.	The only Hazardous waste generated is spent oil which is mixed with bagasse and burnt in Boiler. Non Hazardous waste is composted.
H.	<b>GENERAL</b>	
1.	The applicant shall not allow the discharge from the other premises to mix with the discharge from his premises.	Yes, strictly followed.
2	The applicant shall promptly comply with all orders and instructions issued by the Board from time to time or any other officers of the Board duly authorized in this behalf.	Yes, Strictly followed.
3	The applicant shall set-up Environmental Cell comprising of qualified and competent personnel for complying with the conditions specified.	Already existing.
4	The Board reserves the right to review, impose additional conditions, revoke, change or alter terms and conditions of this consent.	Agreed.
5	The applicant shall forth with keep the Board informed of any accidental discharge of emissions/effluents into the atmosphere in excess of the standards laid down by the Board. The applicant shall also take corrective steps to mitigate the impact.	Agreed.

6	The applicant shall provide alternate power supply sufficient to operate all pollution control equipments.	D.G.Set already in existence.
7	The entire premises shall always be kept clean. The effluent holding area, inspection chambers, outlets, flow measuring points should made easily approachable.	The premises are kept cleaned & all the equipments in ETP site are easily approachable. Yes, displayed the Board.
8	The applicant shall display the consent granted in a prominent place for perusal of the inspecting officers of the Board.	
9	The applicant his heirs, legal representatives or assignee shall have no claims what so ever to the continuation or renewal of this consent after expiry of the validity of consent.	Noted.
10	The applicant shall make an application for consent for subsequent period at least 45 days before expiry of this consent.	Noted.
11	The applicant shall develop and maintain adequate green belt all around the periphery.	We have already planted trees about 25,000 Nos & proposal to plant about 2000 nos of trees during rainy season.
12	The applicant shall provide rain water harvesting system and shall provide proper storm water management system.	Partially we have implemented, further we are consulting rain water harvester & will be implemented before commencement of 2021-22 season.
13	This consent is issued without prejudice to any court cases pending in any Hon'ble court.	Noted.
14	The applicant shall furnish the Environmental statement for every financial year ending with 31 <sup>st</sup> march in Form-V as per Environment (Protection) Rules, 1986, the statement shall be furnished before the end of September.	Yes, the same is submitted regularly, on or before 30 <sup>th</sup> September of every year.
15	The applicant shall display flow diagram of the pollution control system near the pollution control system/s.	Yes, displayed.

## Other Conditions.

## 1. TREATMENT &amp; DISPOSAL OF EFFLUENTS.

## (a) SUGAR AND CO-GENERATION UNIT:

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| 1 | The applicant shall ensure that waste water generation from Sugar plant is always less than or equal to 100 liters/tonne of cane crushed.  | The effluent quantity is not exceeding the norms laid down in the consent.    |
| 2 | The applicant shall provide effluent flow meters to record the effluent quantity discharged.   | Provided 'V' notch for measuring of effluent quantity discharged.             |
| 3 | The applicant shall ensure that the trade effluent from Sugar & Co-generation plant is treated in separate treatment plants constructed as per the flow sheet submitted by the industry. The treated effluents shall be used for cooling tower make up, excess effluent conforming to standards stipulated in Annexure-I is permitted to be used on land for irrigated within the industry premises. | Separate treatment plants are provided.                                       |
| 4 | The discharge from the effluent treatment plant of the applicant shall pass through terminal manhole/manholes where from the Board shall be free to collect samples at any time in accordance with the provisions of the Act or Rules made there under.  | We have provided terminal manhole for collection of treated effluent samples. |
| 5 | The applicant shall provide 15 days storage capacity for treated effluent to take care of no demand for irrigation. The storage tank shall be impervious.  | Yes, we have provided 15 days capacity storage pond.                          |
| 6 | The ETP units should be made easily approachable for the inspecting Officers.  | Yes, it is made as per consent order.   |
| 7 | The Factory authorities shall display the approved flow sheet in the ETP area on a Board along with discharge standards stipulated in the consent order.   | Yes, it is displayed as per consent order.                                    |
| 8 | The applicant shall paint the name and capacity of each unit of ETP.   | Yes, it has been painted.   |
| 9 | The applicant shall provide lined and closed drains to convey trade effluents to ETP for further treatment and disposal.   | Yes, it is provided as per consent order.                                     |

## WASTE WATER CONSERVATION AND POLLUTION CONTROL MANAGEMENT.

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| 1 | The applicant shall treat non-process effluent scientifically on continuous basis and recycle to process or utilizes or allied units. | Yes, the excess condensate is cooled in a Cooling Tower to ambient temp and then utilized for dilution of molasses in our own distillery unit. |
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2	Effluent treatment plant to be stabilized one month prior to the start of the crushing season and continue to operate one month after the crushing season.	Yes, it is strictly followed
3	Flow meter to be installed in all water abstraction points and usage of fresh water to be minimized.	Water meters are installed.
(B)	<b>DISTILLERY SPENT WASH MANAGEMENT.</b>	
1	The maximum number of working days of the distillery shall not exceed 270 days in the consented period.	The No. of working days of Distillery is below 177 days, for example, we have operated the Distillery for the last 3 years is as below. 2018-19 :- 105 days 2019-20 :- 87 days 2020-21 :- 104 days
2	The applicant shall ensure that the entire spent wash is converted into compost by bio-composting on impervious compost yard. The compost quality shall conform to the specification as stipulated in the Annexure-II.	Yes, the entire spent wash is converted into compost in surface Compost yard and RCC compost pits only. The compost quality is as per the consent condition.
3	The applicant shall ensure that no spent wash is by passed to land or stream so as to avoid surface or sub-surface water pollution.	The entire spent wash is converted into compost and it is never bypassed on land or into stream.
4	The applicant shall avoid storing of spent wash in unlined lagoons to avoid surface or sub-surface water pollution. Storage of spent wash in impervious holding tank shall not be more than 30 days.	The spent wash is stored in lined lagoons only and the storage shall be limited for 30 days only.
5	The applicant shall synchronize the generation of spent wash and composting activity in such a way that composting is avoided during rainy season.	The composting operations are closed during the rainy season.
6	The applicant shall ensure that the composting activity is carried in a manner so as not cause surface or sub-surface water pollution.	Yes, the composting activity is carried in Bio-Compost yard & RCC pits in a scientific manner so as not to cause surface or sub-surface water pollution.
7	The applicant shall make proper arrangement for collection of storm water that overflow the compost yard by providing proper impervious garland canal catch pit and the collected effluent shall be mixed with the spent wash and subjected to composting.	The garland canal is provided around surface compost yard and compost pits & if there is any leachate it is pumped back into compost pits/yard.

8	The applicant shall provide test bore wells to check the ground water contamination and submit the analysis report of ground water to the Regional Office.	At the downstream of the compost yard there are borewells/ openwells which are taken as test borewells to asses ground water contamination.
9	Rain water shall not be allowed to enter the compost pit. All round the compost pit, garland canal shall be provided with a collection tank.	Yes, Rain water do not enter into compost pits/ yard as we have provided garland canal and collection pits.
10	Spent lees shall be treated along with sugar plant effluent.	The spent lees shall be separated and taken into sugar ETP for further treatment.
11	The applicant shall explore installation of Bio-methanization plant before composting and gas can be used in boiler as fuel.	Your suggestion shall be considered during the expansion of the distillery capacity.
12	The applicant is yet to increase product from 54 KLD to 84 KLD and Ethanol 30 KLPD as per EC obtained dated 09.04.2009. The industry shall obtain prior CFE & CFO of the Board and shall comply with EC conditions for treatment disposal of spent wash.	Noted.
<b>C</b>	<b>SELF MONITORING AND REPORTING FOR COMPOSTING.</b>	
1	The applicant shall at his own cost get the samples of biomethanted spent wash and analyze the same once in 15 days for pH, EC and total volatile solids.	Monthly extract of daily product manufactured shall be submitted hence forth.
2	Monthly extract of daily product manufactured, No. of days of operation & effluent discharge shall be submitted to the Regional Officer regularly every month & once in six months production details, duly certified by excise Superintendent shall be submitted to Regional Office and the Board.	Monthly monitoring results are submitted regularly to the Regional Office, Chikkodi.
3	The applicant shall analyze finished compost from each cycle for the parameters moisture, organic carbon, P.N. K and C/N ratio in addition EC of the water extract of the compost shall also be monitored.	Yes, shall be followed hence forth.
4	The effect of composting operations on ground water quality shall be monitored by analyzing samples every six months from five hand pumps about 50 M from the compost yard, encircling the entire area.	Pizo meters shall be installed as per the CPCB guidelines.
5	The applicant shall maintain at least 3 water quality stations/ hand pumps as background stations at a sufficient distance from the compost yard and shall be monitored every six months.	Piezometer shall be installed.

6 The industry shall take all necessary measures to avoid odour nuisance both from the process and from the effluent handling.

7 The applicant shall stop composting operation immediately on observation of first deterioration of ground water quality.

**D DISCHARGE OF EMISSIONS UNDER THE ACT**

1 The discharge of emissions from the premises of the applicant shall pass through the stacks/ chimneys mentioned in Annexure-III to the consent, where from the Board shall be free to collect the samples at any time in accordance with the provisions of the Act and Rules made there under. The stacks/ Chimneys heights shall be as per Annexure-III.

2 The applicant shall operate the air pollution control equipment as specified in the Annexure-III, continuously so as to ensure that the emission does not exceed the limits specified. The operation of the control equipment shall be synchronized with the operation of the emission source.

3 The applicant shall provide port holes for sampling the emissions and access platforms for carrying out stack sampling and provide electrical outlet points and other arrangements for all chimneys/stacks and other sources of emissions within 30 days from the date of receipt of this consent order so as to collect the sample of emissions by the Board or the applicant at any time in accordance with the provision of the Acts & Rules made there under.

4 The applicant shall maintain port whole, access platforms for carrying out stack sampling with electrical outlet points for sampling the emissions from port holes in all the stacks, as per the guidelines.

5 The applicant shall treat and dispose any liquid effluents produced in the course of control of air pollution by scrubbing, conditioning etc., of flue gases in accordance with the provisions of the Water (Prevention and Control of Pollution) Act, 1974. The Details of such discharges shall be quantified and monitored immediately after commissioning and details of collection, treatment and disposal shall be furnished to the Board.

Implementation.

Noted.

As per Annexure-II the emissions are passing through stacks/chimneys only.

As per Annexure-II the emissions are always below the consented parameters.

Plat forms and portholes are maintained properly for sampling of stack emissions.

Yes, provided.

Not applicable as the systems are ESPs and bag filters.



## E SELF MONITORING AND REPORTING BY THE INDUSTRY

1	The applicant shall at his own cost get the treated trade effluent samples collected from the place specified and analyze the same once in a month for the parameters indicated in Annexure-I and report submitted once in a month along with the quantity of water used, waste water generated, treated, and discharged, product manufactured etc, in a compiled statement to the concerned Regional Office.	Monthly extract of daily product manufactured shall be submitted hence forth.
2	The applicant shall at his own cost get the samples of emissions collected and get them analyzed once a month for the parameters indicated from the sampling port holes provided.	Monthly monitoring results are Submitted the Regional Office, Chikkodi.
3	The applicant shall carryout the Ambient Air Quality monitoring and submits the report to the Regional Office of the Board. The AAQM stations shall be carried out in all the established stations as per the requirement under the National Ambient Air Quality monitoring standards stipulated in Environmental (Protection) Rules, 1986. The Industry shall furnish statistical analysis for annual average of pollutants at all the locations as per Ambient Air Quality standards Notification once in a year.	The ambient air quality is carried out regularly and the yearly analysis of the results shall be submitted both in statistical and graphical format.
4	The applicant shall regularly monitor the ground water of the wells situated in agricultural where treated trade effluents is used for irrigation for water quality parameters and submit report.	Ground water of the well situated in agricultural area analyzed once in a month and submitted to the Regional Officer, KSPCB, regularly.
5	<p>a) The applicant shall maintain the online continuous stack emission monitoring system for measurement of emissions parameter like PM (for boiler attached to distillery) and monitoring data shall be connected &amp; up loaded to KSPCB and CPCB's servers.</p> <p>b) The applicant monitor the treated effluent through online continuous effluent quality monitoring system at the outlet of sugar plant ETP for the measurement of parameters flow, pH, COD, BOD, TSS and monitoring data shall be connected &amp; up loaded to KSPCB and CPCB's servers.</p>	<p>As per the CPCB guidelines online stack monitoring system adopted for distillery attached boiler.</p> <p>We have already installed online continuous monitoring for treated effluent &amp; Monitoring data has been connected &amp; uploaded to KSPCB &amp; CPCB's servers.</p>

	c) Once in a month by 5 <sup>th</sup> , the max, min & Average values and also the number of time, the exigencies recorded shall be submitted to Regional Office.	We are submitting the online monitoring results regularly to the Regional Office. In future once in a month maximum, minimum and average values shall be submitted to Regional Office.
6	The applicant shall	
	a) Submit the monitoring results as under	
	i) Data monitored as per prescribed schedule shall be submitted to the Regional Office every month.	Yes, shall be complied.
	ii) A compiled data of all monitoring conducted as per schedule during the consent period shall be submitted in hard copy along with consent application.	Yes, shall be complied.
<b>E</b>	<b>MOLASSES STORAGE</b>	
1	a) The application shall store the molasses only in steel tanks covered with proper roofing.	The steel molasses tanks are only used for molasses storage & we have provided steel tank of capacity 16500 MT which is adequate. Already in existence, Molasses shall not be stored in earthen pits.
	b) Adequate number of steel tank shall be provided for molasses in earthen pits is not allowed.	
2	The applicant shall obtain permission from the Board to dispose-off the spoiled molasses and it shall be disposed-off in manner as laid down by the Board.	We do not have any spoiled molasses, in case of any such eventuality for destruction of molasses the permission of Board shall be taken.
<b>E</b>	<b>STORM WATER MANAGEMENT.</b>	
	Storm water shall not be allowed to mix the trade and/or sewage effluent on the upstream of the terminal manholes where the flow measuring devices will be installed.	We are consulting consultant for storm water management and will be done before commencement of 2018-19 crushing season.
<b>F</b>	<b>SOLID WASTE MANAGEMENT</b>	
1	Leachate from the press mud shall be collected and treated and it shall not be allowed to soak down and contaminate the ground water.	The press mud is not stored and it is mixed with spent wash directly for composting.

2	a) The applicant shall collect, store, treat and dispose-off the non-hazardous solid waste in manner so as not to cause pollution. b) The coal shall be stored separately in a shed and the factory authorities shall submit proposals within 30 days.	Complied.  At present coal is not utilized for cogen.
3	The applicant may use coal up to a maximum of 15% only along with bagasse as a fuel for two 100 TPH boilers and fly ash generated during the use of coal shall be separately collected and disposed. Further, the Ash generated from the use of coal has to be separately handled and disposed as per the provisions of fly ash Notification. A separate log book has to be maintained & record the generation and mode of disposal of fly ash. The applicant has to submit a plan of action for the disposal of fly ash within 15 days to the Board. If the applicant proposes to use more than 15% coal as fuel for 100 TPH Boiler, prior Environmental clearance from competent authorities has to be obtained.	Coal is not used. Whatever the Ash generated from bagasse firing, it is used in composting and excess, if any, is sold to brick manufactures.  NA
4	The applicant shall comply with Fly Ash Notification, dated 03.11.2009, issued from MoEF.	Complied.
5	The yeast sludge shall be collected separately and used for composting.	Yeast sludge is used in composting and all other solid waste is collected and is used in composting.

Type of solid waste	Quantity in MT	Mode of Collection, treatment and disposal
Press-mud	24550	Used for composting
Wet bottom ash from crate and dry fly ash	3795	
Settled sludge	3500 Kg	Used for composting.

**G. GENERAL**

1	The applicant shall not store any raw materials/ chemicals on naked ground.	Agreed.
2	The applicant shall construct impervious dyke walls/ tank form for storage tanks constructed above ground level.	Noted.
3	The applicant shall display flow diagram of the pollution control system at the site.	Complied.
4	The applicant shall appoint a qualified environmental Engineer/ Scientist for environment management in the factory and also establish an environmental cell.	Already existing.

5	Applicant shall maintain the Environmental Management system in conformity with ISO 14001:2004 standards.	Agreed.
6	The Applicant shall comply with the guidelines under Corporate Responsibilities for Environment Protection (CREP) 2003 issued by Ministry of Environment Forests and CPCB.	Agreed.
7	An Inspection book shall be opened and made available to the Board Officers during their visit to the factory.	Maintained.
8	The applicant shall maintain register recording the ambient air quality, stack monitoring and analysis report of treated effluents. The Register shall be open for inspection by the Board Officers at all time.	Maintained.
9	The Entire premises shall be always kept clean. The effluent holding area, inspection chambers, outlets, flow measuring points should be made easily approachable.	Agreed.
10	The applicant shall display the consent granted in a prominent place for perusal of the inspecting Officers of the Board.	Displayed.
11	Industry shall comply with all the consent conditions and furnish report within 30 days to the Regional Office.	Consent conditions are strictly complied.

Thanking You,

Yours faithfully,  
For S.H.S.S.K.N., Sankeshwar



Managing Director