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REF. NO.: Environment/

KUMBHI - KASARI Sahakari Sakhar Karkhana Ltd., Kuditre.

Cal + Komin Digt + Kalhanner 116001 (Maharashtra)

Tal. : Karvir, Dist. : Kolhapur - 416204 (Maharashtra)

DATE: 21/412018

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To, The Regional Officer, MoEFCC; Regional Office (WCZ), Ground Floor, East Wing, New Secretariat Building, Civil Lines, Nagpur - 440001

Sub. : Regarding verification of compliance done towards conditions stipulated in Environmental Clearance (EC) granted to 5000 TCD Sugar Factory & 19.5 MW Co-generation plant and 30 KLPD molasses based distillery by Kumbhi Kasari Sahakari Sakhar Karkhana Ltd., located at Kuditre, Tal.: Karveer, Dist.: Kolhapur, MS.

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- Ref.
- : 1. EC granted by Department of Environment, Govt. of Maharashtra; for 5000 TCD Sugar Factory and 19.5 MW Co-generation plant vide its Letter No. SEAC-3012/CR-321/TC-2 dated 12th January, 2015. A copy of EC letter is presented at **Enclosure-I** for ready reference.
 - EC granted by MoEFCC; New Delhi IA Division for 30 KLPD Distillery vide its Letter No. ENV (NOC) 1087/141/CR-28/D-I dated 27th October 1988. A copy of EC letter is presented at Enclosure-II for ready reference.

Dear Sir,

This has reference to the EC granted by Department of Environment, Govt. of Maharashtra and MoEFCC; New Delhi vide above mentioned letter. The same was in respect of our 5000 TCD Sugar Factory and 19.5 MW Co-generation plant and 30 KLPD molasses based distillery by **Kumbhi Kasari Sahakari Sakhar Karkhana Ltd.,** located at Kuditre, Tal.: Karveer, Dist.: Kolhapur, MS.

Accordingly, we are submitting herewith a point wise compliance report with respective annexure towards the conditions stipulated in above said EC letter.

We hope the details furnished by us are in accordance with your requirements. Kindly let us know if any additional details are required to be submitted. Also, please communicate about your probable date of visit to our Industry.

Thanking you,

Yours faithfully,

Prakash Chitnis (Managing Director) 0181

Encl.: As Above.

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Brief Summary of the Project

1.	Name of Industry	:	Kumbhi Kasari Sahakari Sakhar Karakhana Ltd.
2.	Name of Project	:	5000 TCD Sugar Factory & 19.5 MW Co-gen plant
3.	Address for Correspondence	:	Kumbhi Kasari Sahakari Sakhar Karakhana Ltd., Kuditre, Tal-karveer, Dist Kolhapur. Maharashtra.
4.	Environmental Clearance Letter No. & Date	:	SEAC-3012/CR-32/TC-2 dated 12 th January, 2015 (for 5000 TCD Sugar & 19.5 MW Co-gen plant).
5.	Location: District & State/UT	:	Dist.: Kolhapur, State.: Maharashtra

Kumbhi Kasari Sahakari Sakhar Karakhana Ltd. is an agro-based processing sugar factory established in the year 1960 situated at Kuditre Tal Karvir, Dist – Kolhapur, having registration No.G/282 of 20-06-1960. The area of operation of the factory comprises of 179 villages in Karvir, Panhala, Gagan Bavada, Shahu-wadi and Radhanagri talukas of Kolhapur District. The first trial season was conducted in 1963-64. First expansion was carried out in 1971-72 with the licensed capacity of 1750 TCD and second expansion is carried out in 1982-83 with the licensed capacity of 3000 TCD and third expansion is carried out in 2014-2015 with the licensed capacity of 5000 TCD.

The project site is located at a distance of about 13.6 Km from Kolhapur. Environmental Clearance for 5000 TCD Sugar Factory & 19.5 MW Co-gen plant is issued from Environment Department, Maharashtra vide its letter no SEAC-3012/CR-32/TC-2 dated on 12th January, 2015. Latest crushing season was started 10.11.2017 and stopped on 17.03.2018. Total crushing of this season is 6, 32,242 M/Tone.

Point wise compliance status to each and every stipulation along with necessary supporting documents as mentioned in Environmental Clearance for 5000 TCD Sugar Factory & 19.5 MW Co-gen plant granted by Department of Environment, Govt. of Maharashtra vide letter no: SEAC-3012/CR-32/TC-2 dated 12th January, 2015.

A. 'GENERAL CONDITIONS' in the Clearance Letter:

Condition No.1: No additional land shall be used / acquired for any activity of the project without obtaining proper permission

Compliance: The total plot area is 2, 38,210 Sq. M. Out of which 10, 07,321 Sq. M. Area is built-up area under Sugar and Co-gen and 44,511 Sq. M area under distillery. Green Belt developed on 78610 Sq. M. area. Refer plot layout enclosed at **Annexure-I.**

Condition No.2: For controlling fugitive natural dust, regular sprinkling of water & wind shields at appropriate distances in vulnerable areas of the plant shall be ensured.

Compliance: Water sprinkling is done to suppress fugitive emissions from handling of bagasse, presmud and ash during crushing season. Further, Molasses, pressmud, ash is transported to disposal sites in covered vehicles.

Condition No.3: Regular monitoring of the air quality, including SPM & SO₂ levels both in work zone and ambient air shall be carried out in and around the power plant and records shall be maintained. The location of monitoring stations and frequency of monitoring shall be decided in consultation with Maharashtra Pollution Control Board (MPCB) & submit report accordingly to MPCB.

Compliance: Routine monitoring of Ambient Air Quality is done for existing unit. The parameters monitored are PM_{10} , $PM_{2.5}$, SO_2 and NOx. Further monitoring reports are regularly submitted to MPCB. Refer **Annexure-II** for latest ambient air quality monitoring reports.

Condition No.4: Necessary arrangement shall be made to adequate safety and ventilation arrangement in furnace area.

Compliance: A boiler of 100 TPH, 25 TPH is installed under co-gen from where steam is taken for sugar factory operations are taken. All boiler safety provisions are made and also boiler is certified under Factory Act through boiler inspector regularly.

Condition No.5: Proper Housekeeping programmers shall be implemented.

Compliance: The compliance under above condition is being done.

Condition No.6: In the event of the failure of any pollution control system adopted by the unit, the unit shall be immediately put out of operation and shall not be restarted until the desired efficiency has been achieve

Compliance: Continuous electricity supplied by in-house 19.5 MW Co-generation plant to pollution control system. Incase of power failure situation, industrial activities are immediately shut down along with pollution control system.

Condition No.7: A stack of adequate height based on DG set capacity shall be provided for control and dispersion of pollutant from DG set. (If applicable)

Compliance: Two no. of DG sets are provided under existing unit. Diesel @ 100 lit/Hr. is used as fuel during only power failure, DG sets are operated. Stack of 7 M height above the roof level is provided along with silencer.

Condition No.8: A detailed scheme for rainwater harvesting shall be prepared and implemented to recharge ground water.

Compliance: Roof top rain water harvesting system is implemented on site The total water made available after rooftop is 2802.29 M³. This water stored in 5000cum capacity holding tank, same is used to increase ground water table and also used for cleaning and miscellaneous.

Condition No.9: Arrangement shall be made that effluent and storm water does not get mixed.

Compliance: Separate gutters are provided for storm water collection. While Effluent is taken through closed pipe to treatment sites.

Condition No.10: Periodic monitoring of ground water shall be undertaken and results analyzed to ascertain any change in the quality of water. Results shall be regularly submitted to the Maharashtra Pollution Control Board.

Compliance: Ground water sample analysis is done by industry regularly and reports are submitted to MPCB. Refer **Annexure-II** for monitoring reports w.r.t same

Condition No. 11: Leq of Noise level shall be maintained as per standards. For people working in the high noise area, requisite personal protective equipment like earplugs etc. shall be provided

Condition No.12: The overall noise levels in and around the plant are shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures, etc. on all sources of noise generation. The ambient noise levels shall confirm to the standards prescribed under Environment (Protection) Act, 1986 Rules, 1989.

Compliance: The overall noise levels in and around the plant area are kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise control generation. Noise monitoring reports for existing unit are enclosed at **Annexure –II**.

Condition No.13: Green belt shall be developed & maintained around the plant periphery. Green Belt Development shall be carried out considering CPCB guidelines including selection of plant species and in consultation with the local DFO/ Agriculture Dept.

Compliance: The total plot area under Sugar & co-gen and distillery is 2, 38,210.00 Sq.m. Green Belt developed on 78610 Sq. M. area, comprising 2005 no. of trees. Additional 3000 no. of trees would be planted before ensuing monsoon. **Annexure - III** showing photographs for existing green belt developed and list of trees planted onsite.

Condition No.14: Adequate safety measures shall be provided to limit the risk zone within the plant boundary, in case of an accident. Leak detection device shall also be installed at strategic places for early detection and warning.

Compliance: Sugar factory is a agro based industry no any hazardous chemicals are used for process nor they are stored on site. As far as sulpher used in process. Same is in powder form.

Condition No.15: Occupational health surveillance of the workers shall be done on a regular basis and record maintained as per Factories Act.

Compliance: Periodical medical examinations for all employees are undertaken on regular basis. Onsite record is also maintained. Health check up reports are enclosed at **Annexure IV.**

Condition No.16: The Company shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling.

Compliance: Fire extinguishers are installed at strategic places. Fire engine is available with the factory. Refer **Annexure V** for photographs of fire extinguishers provided on site.

Condition No.17: The project authorities must strictly comply with the rules and regulations with regard to handling and disposal of hazardous wastes in accordance with the Hazardous Waste (Management and Handling) Rules, 2003 (amended). Authorization from the MPCB shall be obtained for collections/ treatment/ storage/ disposal of hazardous wastes.

Compliance: Hazardous waste generated from sugar and co-generation unit in the form of Used/Spent Oil- 250 Kg/M, Waste/residue containing Oil- 450 Kg/Y and ETP Sludge-10 MT/Y. Spent Oil and Waste containing Oil is burnt in boilers and ETP Sludge is dried in sludge drying beds and used as manure.

Condition No.18: The company shall undertake following Waste Minimization Measures:

- Metering of quantities of active ingredients to minimize waste.
- Reuse of by- products from the process as raw materials or as raw material substitutes in other process.
- Maximizing Recoveries.
- Use of automated material transfer system to minimize spillage.

Compliance: Minimum quantities of chemicals are used in process.

Condition No.19: Regular mock drills for the on-site emergency management plan shall be carried out. Implementation of changes / improvements required, if any, in the on-site management plan shall be ensured.

Compliance: Training and drills are conducted for employees on safety and health aspects of chemical handling. Periodical medical examinations for all employees are undertaken on regular basis. Onsite record is also maintained.

Condition No.20: A separate environment management cell with qualified staff shall be set up for implementation of the stipulated environmental safeguards.

Compliance: Industry is having Environmental Monitoring cell of 5-6 workers and Environmental Officer with M.Sc. (Environment) is heading the environmental cell.

Condition No.21: Transportation of ash will be through closed containers and all measures should be taken to prevent spilling of the ash.

Compliance: Ash to the tune of 600 MT/Month is generated from current operations and same is given to brick manufacturers. Water sprinkling arrangements have been done to avoid fly ash particles from becoming air borne. Also, under proposed green belt plantation programme, plantation shall be done around fly ash storage yard. CPCB guidelines for storage of ash are duly being followed.

Condition No.22: Separate silos will be provided for collecting and storing bottom ash and fly ash.

Compliance: Fly ash generated is stored in yard. Water sprinkling arrangements have been done to avoid fly ash particles from becoming air borne. Also, under proposed green belt plantation programme, plantation shall be done around fly ash storage yard. CPCB guidelines for storage of ash are duly being followed.

Condition No.23: Separate funds shall be allocated for implementation of environmental protection measures / EMP along with item-wise breaks-up. These cost shall be included as part of the project cost. The funds earmarked for the environment protection measures shall not be diverted for other purpose and year-wise expenditure should reported to the MPCB & this department.

Sr. No.	Description	Capital Cost (Rs.) in Crore	Proposed O & M Cost (Rs.) in Crore
1.	Air Pollution Control - APC	2.0	1.0
2.	Water Pollution Control - ETP	0.5	0.2
3.	Noise Pollution Control	0.2	0.1
4.	Environmental Monitoring & Management	0.05	0.02
5.	Occupational Health	0.05	0.02
6.	Green Belt	0.01	0.025
7.	Others (Pl. Specify)		
	Total	2.76	1.365

Compliance: Fully complied, around 4 Crore rupees are allotted for capital as well as operation and maintenance of pollution control equipments.

Condition No.24: The project management shall advertise at least in two local newspapers widely circulated in the region around the project, one of which shall be in the Marathi language of the local concerned within seven days of issue of this letter, informing that the project of the local concerned within seven days of issue of this letter, informing that the project has been accorded environmental clearance and copies of clearance letter are available with the Maharashtra Pollution Control Board and may also be seen at Website at http://ec.maharashtra.gov.in

Compliance: The compliance under above condition has already been done and copies of the newspaper advertisement have been enclosed at **Annexure - VI** that may please be referred.

Condition No.25: Project management should submit half yearly compliance reports in respect of the stipulated prior environment clearance terms and conditions in hard & soft copies to the MPCB & this department, on 1st June & 1st December of each calendar year.

Compliance: Industry regularly submits the six monthly compliance reports to regional office. Refer copies of the same enclosed at **Annexure VII**

Condition No.26: A copy of the clearance letter shall be sent by proponent to the concerned Municipal Corporation and the local NGO, if any, from whom suggestions/representations, if any, were received while processing the proposal. The clearance letter shall also be put on the website of the Company by the proponent.

Compliance: The compliance under above condition is being followed.

Condition No.27: The proponent shall upload the status of compliance of the stipulated EC conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of MoEF, the respective Zonal Office of CPCB and the SPCB. The criteria pollutant levels namely; SPM, RSPM. SO₂, NO_x, (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the project shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.

Compliance: The compliance under above condition is being followed.

Condition No.28: The project proponent shall also submit six monthly reports on the status of compliance of the stipulated EC conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF, the respective Zonal Office of CPCB and the SPCB.

Compliance: The compliance under above condition has already been done.

Condition No.29: The environmental statement for each financial year ending 31st March in Form-V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of EC conditions and shall be sent to the respective Regional Office of MoEF by e-mail.

Compliance: Environmental Audit Report and Hazardous Waste Returns are submitted regularly to respective MPCB office and records are maintained for further reference. Please refer copies of same enclosed at **Annexure VIII.**