

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, SOUTHERN ZONE AT
CHENNAI**

O.A No. 26 of 2019 (SZ)

E. Rajendran & Anr

...Applicants

Vs.

The Ministry of Environment, Forest and Climate Change,
Government of India,
Rep.by its Secretary (EF&C),
Jorbagh Road,
New Delhi and 11 Others

...Respondents

REPLY & DOCUMENTS FILED BY THE
RESPONDENTS 9 TO 12



M/s. S.ARUN PRASAD,
VANDANA PARASURAM &
RAHUL M SHANKHAR
COUNSEL FOR R9 TO R12

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, SOUTHERN ZONE AT
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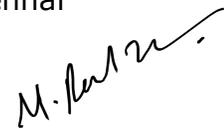
The Ministry of Environment, Forest and Climate Change,
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New Delhi and 11 Others

...Respondents

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Dated on this 10th Day of December, 2020 at Chennai



COUNSEL FOR R9 to R12

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
SOUTHERN ZONE, CHENNAI

Original Application No. 26/2019

BETWEEN:

E.Rajendran
 S/o.Easwara Gowder
 Door No. 5/92,Thekkampatti Post,
 Seeliyur (via),
 Mettupalayam Taluk,
 Coimbatore District and Another

...Applicants

AND

The Ministry of Environment, Forest and Climate Change,
 Government of India,
 Rep.by its Secretary(EF&C),
 Jorbagh Road,
 New Delhi and 11 Others

...Respondents

REPLY FILED ON BEHALF OF THE RESPONDENTS 9 TO 12

The 9th to 12th Respondents abovenamed beg to state as follows:

The address for service of Respondents 9 to 12 is that of their Counsel M/s. S. Arun Prasad, Vandana Parasuram and Rahul M Shankhar, Advocates having office at No. 271, New Additional Law Chambers, High Court Campus, Chennai – 600104 and e-mail address rahulmshankhar@gmail.com.

1. It is submitted that the 12th Respondent herein is the Unit Head and as such is well acquainted with the facts of the case. As the issue pertains to the industry located at ITC Limited, PSPD, Vivekanandapuram, Thekkampatti Village, Mettupalayam Taluk, Coimbatore the 12th Respondent craves leave of this Hon'ble Tribunal to file this Reply on behalf of Respondent No's 9 to 12.
2. At the outset, it is submitted that the present Complaint is a motivated one and is filed with a malafide intention without any basis by knowingly making false and incorrect statements and in utter disregard of facts and therefore the Complaint is liable to be dismissed on this ground alone. The main allegation made in the complaint was that the effluent water from the Respondent No. 12 factory spilled into the Applicants' land and damaged it. There was no proof of that allegation and therefore false to the knowledge of the Applicants and

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made with ulterior motives. The report filed by the PCB also clearly shows that there was no proof that the Applicants' land was damaged due to spill of the effluent water.

3. It is submitted that the Applicants have not come with clean hands before this Hon'ble Tribunal as they have not disclosed their relationship/association with the 12th Respondent which shows their ulterior motives. It is submitted that the Applicant No. 1 owns a tractor with Registration No. TN40M7462. The said tractor was hired by M/s Rangaraj contractor (service provider to this respondent). He was drawing Rs. 22500/- (Rupees twenty two thousand only) per month towards hired charges and Rs.10,000/- (Rupees ten thousand only) towards salary for driving the Tractor.
4. The 2nd Applicant is also working in the 12th Respondent's Company as Contract Employee and is on the rolls of M/s. Servokraft. The 2nd Applicant has been trying for a permanent employment with the 12th Respondent's Company and the proposal was also considered favorably by the 12th Respondent's company but he was not taken due to medical reasons. He has been drawing a Salary of Rs.11,000/- per month as Contract Employee.
5. The Applicant's elder brother Mr. Varatharaj is a Manager - (Employee ID - 87452, PP-4 grade) in the 12th Respondent's company.
6. In view of the above factual position about the Applicants, it is abundantly clear that the Applicants are directly or indirectly employed / engaged for their livelihood with this 12th Respondent Company are also enjoying in the act of holding the 12th Respondent Company for a ransom with ulterior motives. It is submitted that the present Complaint is filed with only malafide intentions by hiding the crucial facts and hence, this Complaint / Original Application is liable to be dismissed on this ground alone.
7. It is also submitted that the Applicants have made scandalous and patently false statements to mislead this Hon'ble Tribunal in spite of knowing the facts,

thereby prompting this Hon'ble Tribunal to appoint an expert committee to

investigate and file a Report. To set the record straight, it is submitted that



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not a single drop of wastages or effluents enter into the River as the River is located around 5 KMs from the Factory. The effluent water is used within the Factory premises to irrigate and grow plantations. For this purpose, the Company has purchased around 222 Acres by investing around Rs.400 Lacs as per the directions of the Tamil Nadu Pollution Control Board (PCB) to irrigate the lands and develop the green belt. The Applicants have also misled this Hon'ble Tribunal by stating that the effluent treatment plant (ETP) is not functioning properly. The ETP installed at the Factory is working efficiently and the 12th Respondent's Company has been incurring an expenditure of Rs 200 Lacs per annum. The effluents are regularly monitored by the PCB and Reports are being filed as per the Consent Orders given in favour of the 12th Respondent Unit. Equally scandalous and untrue is the statement that the untreated effluents are forming streams and flowing into the canals. The Applicants have exaggerated and made false statement only to draw the attention of this Hon'ble Tribunal. Neither the Applicants nor the PCB has ever pointed out any violation of the Consent Order. This fact stands proved by the report filed by the expert Committee appointed by this Hon'ble Tribunal. The Joint Committee vide its Report dt.17.03.2020 has not found any non-compliance as regards the Consent Orders. In view of the above, it is submitted that the present Complaint deserves to be dismissed with Costs for misleading this Hon'ble Tribunal with false statements.

8. It is submitted that the 12th Respondent's Company, M/s. ITC Limited (hereinafter "the Company") is engaged in multifarious businesses such as fast-moving consumer goods (FMCG), packaging, Hotels, paperboards and specialty papers, stationary etc. The Company is carbon positive for the last 14 years and water positive for the last 17 years and it is one of the first companies of its size in the world to achieve these feats. The paperboards Factory at Thekkampatty Village in Coimbatore District was originally

established by Servall Engineering Ltd in the year 1997. Thereafter it was taken

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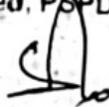



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over by Servall Paperboards Ltd and then by BIPCO (Bilt Industrial Packaging company Ltd). Both the predecessors could not run the Factory and it was running into huge losses and it was on the verge of closure for various reasons including lack of market for the products manufactured thereby threatening to rendering around 850 employees jobless. During the said time of crises, in the year 2004, the Factory was purchased by the present management i.e. the 12th Respondent's Company. The Company has made huge investments in improving the process and product line by bringing down cost of production and the impact on environment. The Company established a co-generation plant in 2006 at a cost of Rs.48 Crores to replace the old boiler. This investment reduced the impact of the operations of the Unit on the environment. In addition to generating steam, the co-generation plant also produces electricity and the dependence of the Unit on the grid supplied electricity has been reduced substantially. The Petitioner also established 5 windmills in the year 2012 at Anaikkaduvu, Tirupur District, Tamil Nadu with installed capacity to generate 7.5 MW power and made an investment of Rs.44 Crores. The power generated through these windmills is used in the Unit and other facilities of the Company. These efforts have also reduced the impact of the operations of the Unit on the environment. Further, company invested around Rs.25 crores in Paper Machine drives and other equipment to improve the efficiency of operation and reduce the water consumption which dropped from 16.65 kL/MT (2011-12) to 9.20 KL/MT (2019-20). During the initial days, the Company faced teething problems due to lack of market and dedicated customer base and with great difficulty the Company had overcome these problems after more than a decade of perseverance and finally has been successful in putting the industry back on rails and protecting the jobs of the employees.

9. It is also submitted that from 2009-19, the Company has invested an amount of Rs. 82 Lakhs in co-gen Boiler improvement, Rs.475 Lakhs on energy conservation, Rs.377 Lakhs on pollution control equipment, Rs.355 lakhs on

ETP Technology upgradation, Rs. 52 lakhs on water conservation. In addition,
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over a period of 10 years the Company has spent Rs. 383 Lakhs on Chemicals used in ETP.

10. It is also submitted that the Company's Unit is an eco-friendly facility and has also been awarded ISO certification for its manufacturing activities. The Unit uses waste paper as raw material. The Government of India encourages the use of unconventional raw materials, including waste paper, in the manufacture of paper and paperboard and has granted various concessions under the Central Excise and the Customs laws if such unconventional materials are used in the manufacture. The said exemptions/ concessions are granted with an objective to encourage setting up of Paper manufacturing units using unconventional raw materials so that deforestation could be avoided. The Company's Unit has been established to manufacture paper and paperboards only out of recycled waste paper. Since the Company's Unit is not depending on the natural source of raw material viz., wood in its manufacturing activity, its operations do not result in depletion of natural resources like forests. The total monthly average paperboard manufactured in the Unit is about 10000 Metric Tonnes. During the period 2018-19, the Unit contributed about Rs. 50 crores to the exchequer by way of taxes.

11. It is submitted that the Company is taking the following steps to constantly monitor that its operations at the Unit are in compliance with the applicable laws:

- (a) The water used in the manufacturing operations is treated in the Effluent Treatment Plant and about 40% of it is reused in the manufacturing process of paper and paperboards.
- (b) The balance treated water is used within the factory premises for irrigation purposes as directed by the PCB and the same is not let out into any streams / canals or other lands.
- (c) Tamil Nadu Agricultural University has been engaged by the Company from the year 2004, to examine the soil and water in and around the Unit and submit a report twice a year to ascertain the impact of the operations of the

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Unit. The report is also furnished to the PCB. The last report for April 2019 to June 2020 prepared by the Tamil Nadu Agricultural University clearly shows that there was no adverse impact on the soil or water by reason of the operations of the Unit.

(d) The Unit established a concrete chimney with a height of 84 meters as directed by the PCB.

(e) The boiler in the co-generation plant is connected with an on-line monitoring facility and the same is connected to the PCB. The reports received from the accredited external laboratory are regularly submitted to the PCB.

(f) The treated water from the Effluent Treatment Plant is tested in the laboratory situated within the Unit on daily basis and also at the accredited external laboratory on monthly basis. The PCB also collects the samples regularly and gets the same tested at its own laboratory.

(g) The sludge from the Effluent Treatment Plant is removed by the contractors who are registered with the PCB.

We believe that there are no adverse findings in the test reports and the 12th Respondent's in-house test facility for the last few years also show that there was no adverse impact on the environment by reason of the operations of the Unit.

12. It is also submitted that Company's Unit has received following Awards and recognitions during the past years recognizing the contributions made by the Unit to the Environment and safety.

- a. Energy Efficient Unit' award at 19th National Award for Excellence in Energy Management 2018 and Excellent Energy Efficient Unit in 20th National Award for Excellence in Energy Management 2019 organized by the Confederation of Indian Industry (CII)
- b. Only facility in India to be awarded the alliance for Water Stewardship Platinum Certification & Only factory in world -Pulp & Paper Sector in the year 2019.
- c. First Paper Mill in India awarded Green Company – Platinum rated in Pulp & Paper Sector by CII in 2015 & 2018.

f. Unit Kovai rated 5 Star in EHS Excellence by CII in the year 2018.

e. Green Award-2013" (1st Prize), "Green Award 2014" (2nd Prize)

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from TNPCB, Government of Tamil Nadu for Environmental best Performance.

- f. Best Environmental performance" from CII National award for innovative Environmental project 2013.

13. It is submitted that pursuant to the Order of this Hon'ble Tribunal dated 13.12.2019, the Joint Committee inspected the factory on 6th and 7th January, 2020. While the final Report was still awaited, the 5th Respondent issued Notice dated 10.01.2020 (**Annexure-R1**) under Air (Prevention and Control of Pollution) Act 1981 pointing out that Online continuous monitoring system was not installed to the 44TPH boiler stack and bottom ash and fine particles were found deposited near coal storage yard. The Company, by Reply dated 31.01.2020 (**Annexure-R2**) stated that and 44 TPH is only a standby Boiler and online system was never stipulated in the consent order for the establishment and the said Boiler has a limited use only as a standby boiler. However online monitoring system is already provided for 60 TPH main Boiler which is functioning regularly as per PCB norms. It was also pointed out that ambient air quality near storage yard is within the prescribed standards and the bottom ash and fine particles are due to the very nature of the material lignite which is naturally present in the area. Another Notice dated 10.01.2020 (**Annexure-R3**) was issued under Water (Prevention and Control of Pollution) Act 1981 to which the Company sent its reply on 31.01.2020 (**Annexure-R4**). The above Notices and Replies may be read as part of this Counter.

14. It is submitted that pursuant to the Order of the Hon'ble Tribunal the expert committee submitted its Report dated 16.3.2020 (**Annexure-R5**) pointing out four purported violations viz., Non-installation of OCEMS in 44 TPH boiler, exceedance of source emission parameters of SO₂ and NO₂ from captive power plant, presence of heavy metals in soil purportedly due to past discharges and presence of plastic waste in Unit premises. The Report also

recommended imposing the interim environmental compensation of For ITC Limited, PSPD, Unit: Kovai




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Rs.331.80 lakhs and environmental compensation of Rs.30,000/- per day for non-installation of OCEMS in 44 TPH boiler until compliance of the recommendations. It is relevant to note that the installation of OCEMS in the stand-by boiler was not a requirement.

15.It is submitted that the 4th Respondent also issued proceedings dated 17.03.2020 (**Annexure-R6**) directing the Company to comply with the directions proposed in the joint committee report dt.16.03.2020 (which was not furnished) and further directing payment of the above mentioned interim compensation amount failing which there was a threat of closure of the Unit and stoppage of power supply.

16.It is submitted that in the interregnum, the 4th Respondent summoned the concerned managers to appear before the TNPCB purportedly for seeking compliance of the proceedings dated 17.3.2020 even though the nationwide situation of the Pandemic (Covid 19) was aggravating day by day. Having no other alternative, even as the nationwide lockdown was still in place with various restrictions, Mr. N. Alagiri, Engineering Chief of the Company had to travel to Chennai and appear before the 4th Respondent on 07.08.2020. The Company also submitted the progress of the works during the personal hearing at TNPCB office on 07.08.2020 at Chennai to all steps that have been taken to comply with the directions issued vide proceedings dated 17.3.2020. It is submitted that the Company's Engineer Chief, Mr. N. Alagiri contracted the Corona Virus (Covid 19) during his visit to Chennai for personal hearing and he was bedridden for almost one month. While the things stood thus, TNPCB issued further proceedings dated 18.8.2020 giving 12 more directions to be complied. Later, on 23/09/2020 team from TNPCB Coimbatore office visited the unit to inspect the progress of the works and demanded response for the minutes of the meeting prepared by TNPCB after personal hearing for which company responded through their letter dated

26/09/2020 giving the required details. Aggrieved by the unwanted coercive step of the Respondents, the Company filed Writ Petition No. 10495/2020



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before the Hon'ble High Court of Madras challenging the demand notice dated 17.03.2020 on the grounds of it being arbitrary, issued without jurisdiction and in violation of Principles of Natural Justice. The Hon'ble Madras High Court on 21.08.2020 passed an Order of Interim Stay of the demand notice dated 17.03.2020 which is annexed hereunder. **(Annexure-R7)**.

17. It is submitted that the directions in the Consent Order dated 03.05.2017 **(Annexure-R8)**, the allegations and grievances of the Complainant in OA 26/2019 and the findings of the Joint Committee and the subsequent directions issued vide proceedings dated 17.3.2020 and 18.8.2020 have nothing in common. It is submitted that neither the Joint Committee Report nor the subsequent proceedings dated 17.3.2020 and 18.8.2020 have pointed out any major violations viz-a-viz the Consent Order dated 03.05.2017. The Joint Committee has neither reported any non-compliance of the Consent Order issued to the Company nor has conducted any enquiry on the genuineness of the Complainant's grievances. Therefore, the enquiry report and the subsequent proceedings dated 17.3.2010 and 18.8.2020 are liable to be rejected in view of the fact that the Complaint itself is motivated and has been filed with a malafide intention and also in view of the fact that the Complainant's are interested parties as they have been directly or indirectly gainfully employed in the Company.

18. Coming to the various allegation in the Complaint / Application, it is submitted as follows:

In reply to para 1 it is submitted that the contentions that the Applicants are Agriculturists and they own agricultural lands are not admitted and the Applicants are put to strict proof thereof. The Applicants have also failed to disclose that they are gainfully employed with the Company.

19. In reply to para 2, it is submitted that the Applicant has made a wrong statement that the industry is situated on the Banks of River Bhavani. It is

submitted that the industry is almost 5Kms away from the River. It is also

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wrong to state that the Company is discharging wastages and other effluents into the Bhavani River as it is patently false and scandalous. It is submitted that not a single drop of effluent water is directly discharged into the River. The effluent water is used within the factory premises for plantation purposes and other agricultural activities and for the said purpose the Company has purchased additional lands to the extent of 222 Acres on the directions of the PCB.

20. In reply to para 3, it is submitted that the statements made therein are false and baseless. It is not correct to state that the ETP is not functioning properly and there is a lack of proper maintenance and chemical effluents are not treated regularly. It is submitted that the factory has a full-fledged ETP to treat the water. The Company has spent Rs.355 lakhs on ETP Technology upgradation, Rs. 52 lakhs on water conservation and in addition, over a period of 10 years the Company has spent Rs. 383 Lakhs on Chemicals used in ETP. The Applicant has made false statements to prejudice the mind of this Hon'ble Tribunal.

21. In reply to para 4, it is submitted that the Applicant has made a wrong statement that due to effluent discharges from ETP, the standing crops in their lands are rotting and losing its quality. It is submitted that the ETP is located on the western side of the factory while the Applicants lands are located on the eastern side of the factory. There is no provision nor any possibility for discharge of alleged untreated effluents into the applicant's lands.

22. The statements made in para 5 are false and baseless. It is not correct to state that the ground water is polluted and ground water is being used for drinking purposes. It is submitted that the village panchayat supplies drinking water from river Bhavani. The ground water quality is being monitored regularly by the Tamil Nadu Agriculture University and reports are regularly submitted to the TNPCB.



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23. The statements made in para 6 are false and baseless. It is wrong to state that the Company accumulates chemical effluents in the lands belonging to the Company which in turn drains into nearby canals. There is no provision or facility for storage of effluent water within the Company premises. Moreover, it is submitted that the Consent Order issued to the Company does not permit such storage and in abiding by terms in the Consent Orders, the Company has never made any arrangements or provisions to the contrary.

24. In reply to para 7 it is submitted that the Company has a co-generation plant which uses Lignite as fuel. There are 3 fuel storage facilities for storing the lignite and was constructed at a cost of Rs.150 Lakhs. The Company has also provided water sprinklers, dust extraction system with bag filters, bitumen Roads in fuel handling and storage area to reduce fugitive emissions. The Fly ash generated in the Boiler is regularly disposed to PCB authorized brick manufacturers. The ambient air quality at plant boundary is within limits and it is submitted that the Company regularly furnishes reports on a monthly basis to the PCB. However, it is pertinent to note that due to the very nature of the fuel, some dust particles get settled on surfaces, but these dust particles may not cause much damage to the crops. That being said, it is submitted that the Unit has taken extensive steps both on its own as well as taking into account the recommendations made by the PCB in curbing any excessive release of fly ash. The joint committee which monitored the ambient air quality during the inspection confirmed compliance to norms.

25. The statements made by the Applicants in para 8 does not merit consideration as the Applicants have made bald statements without providing proof and evidence. The factory is located in a remote location and there are very few habitations near the factory. The nearest village with a habitation of 1400 people is located at a distance of 2.5 Kms. The ambient air quality is regularly monitored and submitted to the PCB. The factory does



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not generate any obnoxious gases as alleged by the Applicants. It is not out of place to submit that the Unit has no Pulp Mill Operation.

26. As regards the allegations in para 9 relating to the dumping of plastic waste, it is submitted that the Company has entered into agreements with neighboring cement factories and has been sending waste plastic to them from the year 2010. Prior to 2010, the plastic waste from the Unit was safely stowed away in Secured Land Fill all of which were sent to cement factories in the year 2010. The Company's Unit had sent photographs of removing the landfills to TNPCB. During inspection, the PCB officials recovered plastic that was shredded and deeply embedded in the soil. The Petitioner is not in a position, at this distance of time, to answer as to how it got there as there were previous owners to this Unit and the Company had only taken over this unit in the year 2004. Thereafter, the Company has been safely monitoring its plastic waste and responsibly disposing them.

27. The submissions made in para 10 are general in nature and needs no specific reply.

28. The contentions made in para 11 are false and baseless. It is submitted that the major solid waste generated in the Unit are fly ash, ETP sludge and plastic waste. Fly ash is stored in boiler plant silos and supplied to brick manufacturers, through closed trucks. ETP sludge is temporarily stored on concrete platforms for drying and later disposed to authorized recyclers and plastic waste is stored inside the plant over concrete platforms and later supplied to cement companies. Therefore, there is no truth in the submissions made by the Applicant. It is submitted that the Company shares responsibility in the protection of the environment and has been taking steps and staying ahead in methods of environment protection throughout all its factories, industries and Units established all over India. The applicants have, with malafide intentions and ulterior motives, lodged this Complaint and initiated proceedings before this Hon'ble Tribunal without any merit and this

Original Application should be dismissed on this ground. P. 136. Limited, PSPD, Unit: Kovai




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29. The contentions made in paras 12 and 13 are false and baseless. The Unit does not discharge untreated effluents. Even the treated effluents are used for irrigation/plantation purposes within the factory premises and within the neighbouring lands owned by the Company. The effluent water does not get discharged into the grooves, canals or River Bhavani as alleged. The Applicants have been making false and baseless allegations without even verifying the facts and this clearly shows their personal spite and vendetta against the Company and the Unit.

30. In reply to para 14 it is submitted that Environment and Forest Department, Government of Tamil Nadu through G.O. dated 30th March 1989 stated that no Industry causing serious water pollution should be permitted to be established within 1 kilometer from the embankments of rivers, streams & dams, etc. Government considered ban on the setting up of highly polluting Industries which include Pulp & Paper (with Digesters) and Thermal Power Plants (except Natural Gas / LNG / CNG / Naptha Biomass based Power Plants, Power Plants using duel fuel of biomass & coal up to 25 MW, Power Plants using waste heat recovery boiler without any auxiliary fuel). Later, through G.O. Ms. No. 127 / E&F / EC Dept / ECIII / dated 08.05.1998 read with G.O. Ms. No (ID) 223 / E&F / EC.III / dated 02.09.1998 have issued orders imposing a total ban of setting up of the above mentioned highly polluting industries within 5 KM from the embankments of rivers & its tributaries. The Company's Unit does not qualify under Pulp & Paper (with Digesters) as it does not have digesters and does not have a Pulp mill. The Unit has a 8MW Thermal Power Plant which runs on Biomass & Lignite / Coal. Environment and Forest Department has carefully reviewed our application for exception and issued the Environmental Clearance for the 8MW power plant. The said Boiler is inspected on annual basis as per Indian Boiler Regulations (IBR) Act. The norm for the distance is evolved based on water pollution caused by the industries. It is submitted that the Company's Unit

does not produce any such pollution whatsoever as can be seen from an

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array of testing reports done from time to time and hence, the above allegations are false filled with malicious intent.

31. In reply to Para 15, the allegations therein are explicitly denied. It is submitted that Waste paper is sourced through imports (10%), domestic supply (50%), sourced from other ITC units (20%) and collection & supply from Well Being Out of Waste (WoW) (15%) and pulp sheets (5%). Imported waste paper is inspected at every consignment at Port by the PCB. Unit manufactures quality coated board, hence quality assurance and control procedures are in place for procurement of raw materials to ensure quality of the final product. Material coming from Well being out of waste (WoW) centers has segregation facility at source centers to separate plastics, metals and other contraries from the waste paper. Plastic waste coming in laminated/combined form with waste paper is separated in drum pulper at Factory and disposed to cement plants for co-processing. Hence, it is submitted that Unit does not source sub-standard / poor quality raw materials and allegations stating that it generates foul smell at the site and surrounding localities is absurd, filled with malice and can clearly ascertain this complaint / Original Application has been filed without ascertaining any of the facts and hence, ought to be dismissed on this ground also.

32. In reply to para 16, it is submitted that the Applicants are trying to mislead this Hon'ble Tribunal by stating that the Company is in disobedience to the reports filed by the Kasturi Rangan Committee. It is submitted that as per the draft gazette notification dated 27.02.2017, the list of Ecologically Sensitive Areas in the Western Ghats Region have been uploaded in http://www.indiaenvironmentportal.org.in/files/file/Western%Ghats_2.pdf, within which Thekkampatty and Kemarapalayam villages do not find place. Since the place in which the Company's Unit is established does not find place in the above gazette, the findings of the Kasturi Rangan committee

report is inapplicable to the Company. It is also pertinent to point out that the gazette is still in its draft stage.

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33. In reply to Para 17, it is submitted that the averments therein are expressly denied by the Company and the applicants are put to strict proof thereof.

34. In reply to Para 18, it is submitted that Applicant's lands are on opposite sides to discharge point of the ETP plant which is explicitly used only for internal irrigation. The Unit does not have provision to discharge treated effluents other than in its own land for irrigation, which is also well known to the Officers of the PCB who come for regular inspection of the ETP Plant and the Unit. The Company in association with TNAU (Tamil Nadu Agricultural University) monitors the quality of ground water and soil periodically and the parameters are found to be within the prescribed norms for irrigation (**Annexure-R9**). Ambient air quality is monitored at 5 locations around the plant as per the relevant guidelines and the data collected from such oversight is clearly seen to be within permissible limits as approved by the PCB. Hence, the allegation that the Unit is responsible for the lower yearly yields of the Applicants is blatantly false and is expressly denied.

35. In reply to Para 19, it is submitted that the Company's Unit consumes an average of around 3000 Kilo Liters of Water per day and discharges treated effluents of around 2600 Kilo Liters per day. All of the treated effluents are used recycled for manufacturing (around 40%) and balance is used for irrigation of the Company's lands and it is assured that not a single drop is let out into neighboring lands or discharged into the canals, streams or the river. The allegation that the water supply of 23 villages are affected due to the discharged effluents from the Unit is false and explicitly denied.

36. In reply to Paras 20 and 21, it is stated that the data monitoring the ETP water outlet is continuously transmitted to the CPCB and TNPCB. It is pertinent to note that the Joint Committee as appointed by this Hon'ble Tribunal had conducted tests on the water in the Unit as well as samples collected from neighboring lands. In their report, no adverse effects on water have been reported. It is also to be noted that Company confirms it has

complied with stipulated norms in terms of discharge of treated waste water

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S. VENKATA RAO
UNIT HEAD



for irrigation, ambient air quality, particulate matter emissions and in handling of solid waste generated in the plant. There is no loss of life due to emissions and discharges from Industrial operations as falsely alleged and the applicants have shown no evidence of the same and this is clear enough to indicate that the Applicants do not have anything to support their bald and baseless allegations. Hence, the complaint and this Original Application ought to be dismissed on this ground also.

37. In reply to Para 23, it is submitted that it is baseless to state that the applicants have ample proof of environmental pollution when none have neither been submitted before the Hon'ble Tribunal not Annexed to the Original Application. It is stated that the Unit is in total compliance with the norms established by the Pollution Control Board and Environmental Laws and Regulations of the Country and State. It is also stated that there have not been any violations of the Consent Orders given to the Company and regular reports are submitted to the CPCB and TNPCC in consonance of the same. Hence, stating that proof is available with the applicants but not produced before this Hon'ble Tribunal is enough to conclude that there is no proof to the contrary of what has been stated by the Company in the Counter and hence, the present proceedings must be dismissed on this ground also.

38. In reply to Para 24, it is stated that the Joint Committee appointed by this Hon'ble Tribunal had visited the Company's Unit and had inspected all levels of pollution as alleged by the Applicants and it is stated that a positive report was formulated by the Joint Committee with respect to Its findings and analysis of samples. Hence, it has been established that the Unit is not polluting the environment in any way or manner,

39. In reply to Paras 25 and 26, it is respectfully submitted that the above iteration of facts and reply to the Application clearly shows that the Company has been targeted out of personal spite and vengeance on part of the Applicants herein. It is also submitted that there have not been any adverse

reports against the Company either by the Joint Committee or by the various

For ITC Limited, PSPD, Unit: Kovai

S. VENKATA RAO
UNIT HEAD



agencies that have been engaged (including TNAU) by the Company in conducting environment checks over the years. Therefore, it can be concluded that the Company is in no way destroying the alleged livelihood of the neighboring farmers. Let alone the applicants. Again, it is submitted that these allegations are made without any basis and with ulterior motives.

40. In response to Ground 1, the allegations therein are denied and it is stated that the Unit is in total compliance of the Consent terms issued by the PCB.

41. In response to Ground 2, it is stated that the officers of the PCB collect samples for testing on a monthly basis and regular reports are filed to that effect, hence the allegations therein against Respondents 9 to 12 are denied.

42. In response to Ground 3, It is stated that samples collected are tested by the PCB in their own labs and results shared with the Company. The Unit on the other hand, transmits data for those systems that are connected with the TNPCB server regularly. Hence, allegations against Respondents 9 to 12 are denied.

43. In response to Grounds 4 & 5, the allegations are beyond the scope and reach of this Respondent and are hence denied.

44. In response to Ground 6, it is submitted that pursuant to the TNPCB inspection, to avoid dispersion of fly ash, a new fuel shed has been established along with water sprinklers on the approach road. The storage area has been covered along with tree covers being planted, all which have been implemented on instructions from the TNPCB.

45. In response to Ground 7, it is stated that all or most of the waste generated inside the Unit have been put to use in various environmentally friendly ways and those that cannot be reused have been disposed of responsibly as iterated previously in the Counter. It is submitted that no waste is dumped outside the premises of the Unit and allegations here in are denied.

46. In response to Ground 8, it is submitted that the Joint Committee as appointed by this Hon'ble tribunal had collected samples from the Applicant's borewell. After analysis, it has been proved to be safe for irrigation and



For ITC Limited, PSPD, Unit: Kovai


S. VENKATA RAO
UNIT HEAD

unaffected due to industrial activity. Hence, the allegations are false and this clearly shows the malice on part of the applicants.

47. In response to Ground 9, It is respectfully submitted that the Applicants claim to have proof of environmental pollution but have not produced the same before this Hon'ble Tribunal only shows that their allegations are baseless and without backing. At the risk of repetition, it is respectfully submitted that this Hon'ble Tribunal should dismiss this Original Application as it is made clear that the present complaint has been filed out of spite and personal vengeance against Respondents 9 to 12.

48. In response to Ground 10, all allegations therein are denied. It is respectfully submitted that the Company is still under the process of obtaining necessary approvals, Consent and Licenses for the establishment of a second Unit and it is submitted that no work is going on inside the Unit premises with respect to expansion.

49. In response to Grounds 11 and 12, it is stated that the Company has been obeying all conditions imposed by the PCB, the Environment rules and regulations of our Country and State and also has been recognized for its environment friendly methods throughout the world. It is submitted that no proof whatsoever has been adduced by the applicants to show that the Company's Unit has been in violation of the established consent terms or norms or regulations.

50. It is therefore most respectfully stated that this Original Application has been filed out of sheer malice, spite and vengeance against the Company, which can clearly be seen from the positive reports of various institutions that have been part of testing and analyzing over the years.

51. It is stated that the Company has been working with the officials of the PCB over the years in making the Unit as environment friendly as possible and has spent lakhs and lakhs of money on the same. It is submitted that even after commencement of the above proceedings, the Unit has been improving

the standard of environmental protection by complying with the alleged

For ITC Limited, PSPD, Unit: Koyal



S. VENKATA RAO
UNIT HEAD



deficiencies noted by the Demand notice dated 17.03.2020 (**Annexure-R10**) and the subsequent notice dated 18.08.2020 (**Annexure-R11**). These allegations of deficiencies were neither brought to the notice of the 12th Respondent prior to the commencement of the present proceedings, nor were a part of the Consent Orders obtained from the PCB. However, playing its part in the sustenance of our environment, the Company has gone out of its way, spending enormous amounts of money to comply with the set of queries raised through these notices. It is submitted that this Application is a clear abuse of process of law and court, filed with malafide intentions and ulterior motives and therefore ought to be dismissed with exemplary costs on all the above grounds.

It is therefore most respectfully prayed that the present Original Application be dismissed for the reasons stated above, with costs and pass such further order or orders as this Hon'ble Tribunal deems fit in the interest of Justice and Equity.

VERIFICATION

I, S. Venkata Rao S/o S. Sanyasi Rao, the Unit Head, 12th Respondent herein and having office at Mettupalayam do hereby verify and affirm that the contents of this Counter in Paras 01 to 51 are true to the best of my knowledge, belief and information.

Verified at Coimbatore on this 9th Day of December, 2020.

For ITC Limited, PSPD, Unit: Kovai

S. VENKATA RAO
UNIT HEAD

DEPONENT

[Signature]
9/12/2020
R. GANESH PANDIAN B.A., B.L.,
ADVOCATE & NOTARY
194-D1, Karamadai Road,
Mettupalayam-641 301
COIMBATORE DISTRICT



For ITC Limited, PSPD, Unit: Kovai

S. VENKATA RAO
UNIT HEAD

R1
20



By RPAD

TAMIL NADU POLLUTION CONTROL BOARD

O/o. District Environmental Engineer
Tamilnadu Pollution Control Board
Coimbatore North
No. 5, Ramasamy Nagar
Kavundampalayam
Coimbatore - 641 030.

Proc No. F.CBS0038/DEE/TNPCB/CBN/RL/A/2020/dated 10.01.2020

Sub: TNPCBD - Industries - M/s. ITC LIMITED, PSPD UNIT KOVAI, SF No. 241/1, 409/1, 409/2A, 409/2B, 409/2C, 409/2D etc., Thekkampatty Village, Mettupalayam Taluk, Coimbatore District - Inspection of the unit on 06.01.2020 & 07.01.2020 - Violation under the Section 21 of Air (Prevention and Control of Pollution) Act, 1981 as amended in 1987 - **Show Cause Notice** - Issued - Reg.

- Ref: 1. CTO Expansion Proc. No. Proc. No.T12/TNPCB/F.0038CBN/RL/CBN/A/2016 DATED: 11/08/2016.
2. CTO Renewal Proc. No. T12/TNPCB/F.0038CBN/RL/CBN/A/2017 DATED: 03/05/2017
3. Joint inspection of the unit on 06.01.2020 & 07.01.2020 by the officials of Tamil Nadu Pollution Control Board, Coimbatore North along with official from CPCB.

The Air (Prevention and Control of Pollution) Act, 1981 as amended in 1987 is in force in Tamil Nadu. Tamil Nadu Pollution Control Board enforces the above central Act. The TNPCB is implementing the Air (P & CP) Act, 1981, as amended thereon. As per the Section 21 of the said Act no person shall, without the previous consent of the State Board shall establish or operate an industrial plant in an Air Pollution Control Area.

Tamil Nadu Pollution Control Board serves this notice on you as occupier for contravening the conditions imposed in the first consent order and subsequent consent orders in the references 1st and 2nd cited under Section 21 of the Air (Prevention and Control of Pollution) Act, 1981 as amended 1987.

Whereas during inspection of M/s. ITC LIMITED, PSPD UNIT KOVAI, SF No. 241/1, 409/1, 409/2A, 409/2B, 409/2C, 409/2D etc., Thekkampatty Village, Mettupalayam Taluk, Coimbatore District by TNPCB Officials on 06.01.2020 & 07.01.2020, it was observed that:

1. **Online Continuous Monitoring system was not installed to the 44 TPH boiler stack.**
2. **Fugitive emission from storage yard of boiler fuel and bottom ash was observed during inspection. Lot of fine deposits were noticed near the storage yard.**

and as such the provisions of Section 21 of the Act have been contravened which is punishable under Section 37 of Act with imprisonment for a term which shall not be less than one year and Six months, but which may extend to six years and with fine.

Hence, you are directed to show cause within 15 days from the date of receipt of this notice as to why penal action should not be initiated against you for operating the unit without adequate air pollution



[Handwritten Signature]



control measures and for having not obtained the valid consent of the Board (for additional emission sources) under Section 21 of the said Act and to issue directions under Section 31A of the Act for closure of the unit and for the stoppage of electricity etc..

It is informed that non-receipt of reply within the prescribed period will be construed that you have no satisfactory explanation to offer for the above contravention and action will be taken accordingly.

[Signature] 10/11/20
District Environmental Engineer,
Tamil Nadu Pollution Control Board,
Coimbatore North
10/11/20

To ✓
The Head-Operations ,
M/s. ITC LIMITED, PSPD UNIT KOVAI
SF No. 241/1 , 409/1, 409/2A, 409/2B, 409/2C, 409/2D etc.,
Thekkampatty Village,
Mettupalayam Taluk,
Coimbatore District.



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 Fax +91-4254-284304
 www.itcpspd.com

Date: 31.1.2020

ITCK / UH / 2019-20

The District Environmental Engineer,
 Tamil Nadu Pollution Control Board,
 Coimbatore North
 No-5, Ramasamy Nagar,
 Opposite to fire service station,
 Kavundampalayam,
 Coimbatore - 641 030

1. This has reference to your Proc No. F.CBS0038/DEE/TNCPB/CBN/RL/A/2020 dated 10.01.2020 received by us on 17.1.2020 and we hereby give our reply to the same.
2. At the outset, we do not admit that there was any violation of any provisions of the Air (Prevention and Control) Pollution Act, 1981 and we emphatically deny that we contravened any of the conditions imposed by Tamil Nadu Pollution Control Board (hereinafter referred to as the Board) pursuant to the consent issued by the competent authorities after inspection. We now proceed to give our point wise reply to the proceedings dated 10.1.2020 for alleged violation of section 21 of Air (Prevention and Control) Pollution Act, 1981.

3. Online continuous monitoring system was not installed to the 44 TPH boiler stack.

In our Unit 60TPH boiler is operated on continuous basis and 44 TPH to be used as standby boiler. Online stack data of 60TPH boiler is continuously transmitted to M/s Care Air Centre of TNPCB.

It is relevant to bring to your kind notice that 44 TPH standby boiler is provided with 3 field ESP and SPM levels are maintained in accordance with the consented standards. The data is measured at stack offline and reported to the Board. The Unit was under the bonafide belief that the standby boiler need not be provided with on line monitoring instrument as it was not stipulated earlier.

4. Fugitive emission from storage yard of boiler fuel and bottom ash was observed during inspection. Lot of fine deposits were noticed near the storage yard.

It is submitted that the ambient air quality near the storage yard is within the prescribed standards. The fine deposits noticed near the storage yard at the time of inspection is due to the very nature of the material stored i.e. lignite. The fine content in the lignite is 30 - 40% with bulk density of 0.85 to 0.95 gr/cc which is lower than bulk density of the coal. The following measures are already in place to control the fugitive emissions from storage yard.



N. Aravind



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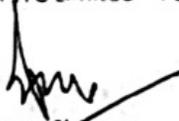
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- I. Unit has constructed 3 fuel sheds for lignite with investment of Rs.150 Lac in phased manner and biomass is stored inside a separate shed. (Refer photos in Annexure 1)
 - II. Unit has provided Dust Extraction (DE) system at transfer points with bag filters at Fuel Handling Plant (FHP). (Refer photos in Annexure 2).
 - III. Unit has installed sprinklers along the roads inside the plant at fuel storage and handling area to suppress the fugitive emissions with investment of Rs.15 Lac (Refer photos in Annexure 3).
 - IV. Roads in the fuel handling and storage area is converted with bitumen surface road with investment of Rs.30 Lac (Refer photos in Annexure 4).
 - V. Unit has provided truck tippler facility at FHP hopper with spray system to directly unload the required quantity of lignite received from Neyveli Lignite Corporation (NLC) into the hopper with investment of Rs 80 Lac (Refer photos in Annexure 5).
 - VI. Unit has planted trees inside the plant to further reduce the fugitive emissions due to fuel handling (Annexure 6).
5. Due to internal handling and nature of the fuel used for the boiler these fine particles are noticed. Unit monitors the ambient air quality at regular basis and found the levels are within the acceptable level. The bottom ash generation is continuous at boiler and it is disposed through authorized recyclers regularly. The Unit will increase the frequency of disposal of bottom ash by directing the authorised recyclers to increase the frequency of removal.

In case if you have any further clarifications, we are prepared to appear before your good selves with necessary documentary evidence at the time of hearing.

Thanking you,

Yours faithfully,
For JTC Limited – PSPD, Unit: Kovai.


Pranav Sharma
Unit Head

Enclosed: Annexure – 1 to 6



S. Arif

S



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www.itcpspd.com

Date: 31.1.2020

ITCK / UH / 2019-20

The District Environmental Engineer,
Tamil Nadu Pollution Control Board,
Coimbatore North
No-5, Ramasamy Nagar,
Opposite to fire service station,
Kavundampalayam,
Coimbatore – 641 030

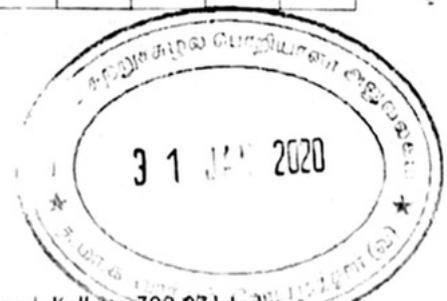
1. This has reference to your Proc No. F.CBS0038/DEE/TNPCB/CBN/RL/W/2019/dated 10.01.2020 received by us on 17.1.2020 and we hereby give our reply to the same.
2. At the outset, we do not admit that there was any violation of any provisions of the Water (Prevention and Control) Pollution Act, 1974 and we emphatically deny that we contravened any of the conditions imposed by Tamil Nadu Pollution Control Board (hereinafter referred to as the Board) pursuant to the consent issued by the competent authorities after inspection. We now proceed to give our point wise reply to the proceedings dated 10.1.2020 for alleged violation of section 25 of Water (Prevention and Control) Pollution Act, 1974.
3. On inspection of the irrigation fields, it was observed that lot of sludge deposits were found all along the irrigation channels, which is evident that the trade effluent was (bypassed) discharged without adequate treatment to remove the suspended solids.

It is submitted that there is no provision to bypass the trade effluents without treatment as alleged in the notice. All the trade effluents necessarily go to the Effluent Treatment Plant (ETP). (Refer Annexure 1 for Flow sheet).

It is submitted that the norm for TSS in treated water discharge is 100 mg/lit. Unit maintains the treated effluent TSS values below the consented norm. Unit regularly analyses the samples at unit laboratory and submits the data to TNPCB on monthly basis. Data for last 3 years are mentioned below.

TSS (mg/lit)	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
2017-18	42	38	26	16	24	26	32	26	20	20	22	28
2018-19	24	26	20	28	22	24	26	28	26	22	32	26
2019-20	26	22	32	36	24	24	28	20	24			

N. Anandhan



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That apart, TNPCB official also collects the samples regularly and the same are analyzed at their laboratory. The values reported for last 3 years analysis are mentioned below.

Month	Aug-17	Sep-17	Oct-17	Jan-18	Apr-18	May-18	Jun-18	Sep-18	Oct-18	Dec-18	Feb-19	Mar-19	Aug-19	Oct-19
TSS – mg/lit	34	14	12	12	42	14	12	12	22	10	30	10	48	30

Apart from above, the data is transmitted to TNPCB and CPCB on continuous basis for TSS along with other parameters.

The traces of deposits found along the channel is due to settlement of residual TSS. You would appreciate that the residual TSS would be present within the permissible level. The Unit has been periodically cleaning such deposits and sending it for vermicompost. However, henceforth, additional steps will be taken and such deposits will be cleaned more frequently and it will be vermi composted along with bio sludge.

Based on above, Unit has not bypassed the plant to discharge the effluent to irrigation and maintained the TSS value in the effluent well below the norm.

- 6. **Biological sludge generated in ETP is used as manure after vermi composting. The yard provided for composting is not adequate. During inspection, it was found that, composting is being carried out in the open land.**

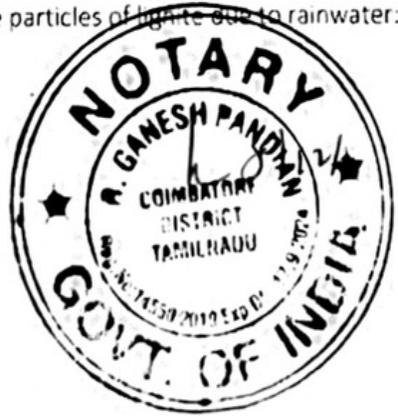
It is submitted that the yard provided for composting is adequate to handle the biological sludge generated in the ETP. After vermi composting the biological sludge becomes manure. Due to the prevailing weather conditions at the time of inspection by TNPCB Officials and due to continuous rains and moisture in the air the composting did not happen in the schedule time and in the scheduled manner. Therefore, the existing vermi compost was not removed as per schedule and the new biological sludge was temporarily kept aside for being deposited in the vermi compost pits. However, to address the concerns of TNPCB, the Unit will further increase the number of vermicomposting beds to avoid open storage by June'2020.

- 7. **The unit has provided shed for storage of boiler fuel, which is found inadequate. Lignite is still stored in the open space near standby boiler area which may carryover rain water during rainy season and it may be deposited in nearby agricultural land.**

The Unit has 3 fuel sheds for storage of lignite. Theses sheds were constructed with an investment of Rs. 150 Lakhs. The lignite stored in the open space near stand by boiler area was for the immediate consumption and was in the process of being consumed or fed into the boiler. Moreover, the lignite stored in the open space is always covered with tarpaulin to prevent any carry over due to rainwater.

In addition to above, the following measures are already in place to prevent carryover of fine particles of lignite due to rainwater:

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(a) Compound wall construction is under progress and has covered 750 meters out of 1500 meters. (Refer Annexure 2 for factory boundary)

(b) During rains, to avoid run-off, rain water harvesting tanks were created at downstream. (Refer Annexure 3 for harvesting tanks)

Therefore, the apprehension expressed is not correct.

8. The process waste sludge (binding chemicals) was found dumped in the area, where cleaning activities is being carried out for installation of solar power system.

We wish to bring to your kind notice that, what was found during the inspection was not process waste sludge. On testing it was found to be rejected calcium carbonate which was inadvertently left at that location by the workers. We wish to bring to your kind notice that Unit has a designated place for all types of solid waste generated in the plant. That inadvertent left-over material came out when the site was being prepared for installation of solar power plant. The solar power plant was being installed for captive consumption and to reduce the fossil fuel consumption and reduce the greenhouse gas emissions.

9. Fugitive emission from storage yard of boiler fuel and bottom ash was observed during inspection. Lot of fine deposits were noticed near the storage yard which may carryover with rain water during rainy season and it may be deposited in nearby agricultural land.

The apprehensions and concerns raised in this para have been addressed vide our detailed reply to the notice under The Air (Prevention and Control of Pollution) Act, 1981 vide point no. 2 and point no. 3 above under The Water (Prevention and Control of Pollution) Act, 1974.

In case if you have any further clarifications, we are prepared to appear before your good selves with necessary documentary evidence at the time of hearing.

Thanking you,

Yours faithfully,
For ITC Limited – PSPD, Unit: Kovai.


Pranav Sharma
Unit Head

Enclosed: Annexure 1 to 4









By RPAD

TAMIL NADU POLLUTION CONTROL BOARD

O/o. District Environmental Engineer,
Tamilnadu Pollution Control Board
Coimbatore North,
No. 5, Ramasamy Nagar
Kavundampalayam,
Coimbatore - 641 030

Proc No. F.CBS0038/DEE/TNPCB/CBN/RL/W/2019/dated 10.01.2020

Sub: TNPCBD - Industries - M/s. ITC LIMITED, PSPD UNIT KOVAI, SF No. 241/1, 409/1, 409/2A, 409/2B, 409/2C, 409/2D etc., Thekkampatty Village, Mettupalayam Taluk, Coimbatore District - Inspection of the unit on 06.01.2020 & 07.01.2020 - Violation under the Section 25 of Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988 - Show Cause Notice - issued- Regarding.

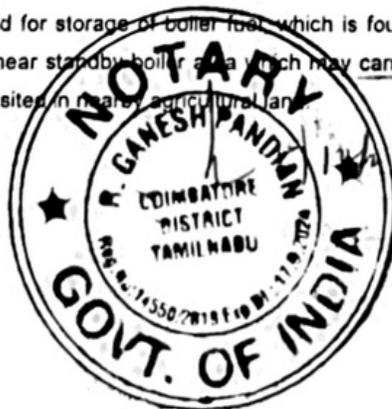
- Ref: 1. CTO Expansion Proc. No. Proc. No.T12/TNPCB/F.0038CBN/RL/CBN/W/2016 DATED: 11/08/2016.
2. CTO Renewal Proc. No. T12/TNPCB/F.0038CBN/RL/CBN/W/2017 DATED: 03/05/2017
3. Joint inspection of the unit on 06.01.2020 & 07.01.2020 by the officials of Tamil Nadu Pollution Control Board, Coimbatore North along with official from CPCB.

Tamilnadu Pollution Control Board serves this notice under sub-section (5) of section 25 of the Water (Prevention and Control of Pollution) Act, 1974 as amended in 1988 (hereinafter referred to as the Act) that any sewage or trade effluent discharged into any stream or well or sewer or on land should be within the standards prescribed by the Board as per the conditions referred in the consent order vide reference 1st cited.

Tamil Nadu Pollution Control Board serves this notice on you as occupier for contravening the conditions imposed in the first consent order and subsequent expansion consent order in the references 1st and 2nd cited under Section 25 of the Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988.

Whereas during inspection of M/s. ITC LIMITED, PSPD UNIT KOVAI, SF No. 241/1, 409/1, 409/2A, 409/2B, 409/2C, 409/2D etc., Thekkampatty Village, Mettupalayam Taluk, Coimbatore District by TNPCB Officials on 06.01.2020 & 07.01.2020 it was observed that:

1. On inspection of the irrigation fields, it was observed that lot of sludge deposits were found all along the irrigation channels, which is evident that the trade effluent was (bypassed) discharged without adequate treatment to remove the suspended solids.
2. Biological sludge generated in ETP is used as manure after vermi composting. The yard provided for composting is not adequate. During inspection, it was found that, composting is being carried out in the open land.
3. The unit has provided shed for storage of boiler fuel, which is found inadequate. Lignite is still stored in the open space near standby boiler area which may carryover rain water during rainy season and it may be deposited in nearby agricultural land.



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4. The process waste sludge (binding chemicals) was found dumped in the area, where cleaning activities is being carried out for installation of solar power system.
5. Fugitive emission from storage yard of boiler fuel and bottom ash was observed during inspection. Lot of fine deposits were noticed near the storage yard which may carryover with rain water during rainy season and it may be deposited in nearby agricultural land.

and as such the provisions of Section 25 of the Act have been contravened which is punishable under Section 44 of the Act, with imprisonment for a term which shall not be less than one year and six months, but which may extend to six year and with fine.

Hence, you are requested to show cause **within 15 days** from the date of receipt of this notice as to why penal action should not be taken against you as occupier for operating in prohibited area without valid consent of the Board under section 25 of the Act and issue direction under section 33 A of the Act for closure of the unit, stoppage of power supply etc.

It is informed that non-receipt of any reply within the prescribed period will be constructed that you have no satisfactory explanation to offer for the above contravention and action will be taken accordingly.

[Signature]
 District Environmental Engineer
 Tamil Nadu Pollution Control Board
 Coimbatore North
 10/01/20

To

The Head-Operations ,
M/s. ITC LIMITED, PSPD UNIT KOVAI
 SF No. 241/1 , 409/1, 409/2A, 409/2B, 409/2C, 409/2D etc.,
 Thekkampatty Village,
 Mettupalayam Taluk,
 Coimbatore District.



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 www.itcpspd.com

Date: 31.1.2020
 ITCK / UH / 2019-20

The District Environmental Engineer,
 Tamil Nadu Pollution Control Board,
 Coimbatore North
 No-5, Ramasamy Nagar,
 Opposite to fire service station,
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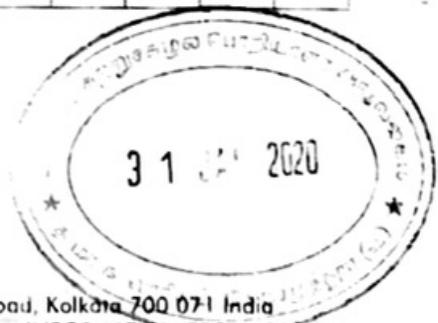
1. This has reference to your Proc No. F.CBS0038/DEE/TNPCB/CBN/RL/W/2019/dated 10.01.2020 received by us on 17.1.2020 and we hereby give our reply to the same.
2. At the outset, we do not admit that there was any violation of any provisions of the Water (Prevention and Control) Pollution Act, 1974 and we emphatically deny that we contravened any of the conditions imposed by Tamil Nadu Pollution Control Board (hereinafter referred to as the Board) pursuant to the consent issued by the competent authorities after inspection. We now proceed to give our point wise reply to the proceedings dated 10.1.2020 for alleged violation of section 25 of Water (Prevention and Control) Pollution Act, 1974.
3. On inspection of the irrigation fields, it was observed that lot of sludge deposits were found all along the irrigation channels, which is evident that the trade effluent was (bypassed) discharged without adequate treatment to remove the suspended solids.

It is submitted that there is no provision to bypass the trade effluents without treatment as alleged in the notice. All the trade effluents necessarily go to the Effluent Treatment Plant (ETP). (Refer Annexure 1 for Flow sheet).

It is submitted that the norm for TSS in treated water discharge is 100 mg/lit. Unit maintains the treated effluent TSS values below the consented norm. Unit regularly analyses the samples at unit laboratory and submits the data to TNPCB on monthly basis. Data for last 3 years are mentioned below.

TSS (mg/lit)	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
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2018-19	24	26	20	28	22	24	26	28	26	22	32	26
2019-20	26	22	32	36	24	24	28	20	24			

N. Arangan



That apart, TNPCB official also collects the samples regularly and the same are analyzed at their laboratory. The values reported for last 3 years analysis are mentioned below.

Month	Aug-17	Sep-17	Oct-17	Jan-18	Apr-18	May-18	Jun-18	Sep-18	Oct-18	Dec-18	Feb-19	Mar-19	Aug-19	Oct-19
TSS – mg/lit	34	14	12	12	42	14	12	12	22	10	30	10	48	30

Apart from above, the data is transmitted to TNPCB and CPCB on continuous basis for TSS along with other parameters.

The traces of deposits found along the channel is due to settlement of residual TSS. You would appreciate that the residual TSS would be present within the permissible level. The Unit has been periodically cleaning such deposits and sending it for vermicompost. However, henceforth, additional steps will be taken and such deposits will be cleaned more frequently and it will be vermi composted along with bio sludge.

Based on above, Unit has not bypassed the plant to discharge the effluent to irrigation and maintained the TSS value in the effluent well below the norm.

- 6. **Biological sludge generated in ETP is used as manure after vermi composting. The yard provided for composting is not adequate. During inspection, it was found that, composting is being carried out in the open land.**

It is submitted that the yard provided for composting is adequate to handle the biological sludge generated in the ETP. After vermi composting the biological sludge becomes manure. Due to the prevailing weather conditions at the time of inspection by TNPCB Officials and due to continuous rains and moisture in the air the composting did not happen in the schedule time and in the scheduled manner. Therefore, the existing vermi compost was not removed as per schedule and the new biological sludge was temporarily kept aside for being deposited in the vermi compost pits. However, to address the concerns of TNPCB, the Unit will further increase the number of vermicomposting beds to avoid open storage by June'2020.

- 7. **The unit has provided shed for storage of boiler fuel, which is found inadequate. Lignite is still stored in the open space near standby boiler area which may carryover rain water during rainy season and it may be deposited in nearby agricultural land.**

The Unit has 3 fuel sheds for storage of lignite. These sheds were constructed with an investment of Rs. 150 Lakhs. The lignite stored in the open space near stand by boiler area was for the immediate consumption and was in the process of being consumed or fed into the boiler. Moreover, the lignite stored in the open space is always covered with tarpaulin to prevent any carry over due to rainwater.

In addition to above, the following measures are already in place to prevent carryover of fine particles of lignite due to rainwater:

N. Arjun

SA



(a) Compound wall construction is under progress and has covered 750 meters out of 1500 meters. (Refer Annexure 2 for factory boundary)

(b) During rains, to avoid run-off, rain water harvesting tanks were created at downstream. (Refer Annexure 3 for harvesting tanks)

Therefore, the apprehension expressed is not correct.

8. The process waste sludge (binding chemicals) was found dumped in the area, where cleaning activities is being carried out for installation of solar power system.

We wish to bring to your kind notice that, what was found during the inspection was not process waste sludge. On testing it was found to be rejected calcium carbonate which was inadvertently left at that location by the workers. We wish to bring to your kind notice that Unit has a designated place for all types of solid waste generated in the plant. That inadvertent left-over material came out when the site was being prepared for installation of solar power plant. The solar power plant was being installed for captive consumption and to reduce the fossil fuel consumption and reduce the greenhouse gas emissions.

9. Fugitive emission from storage yard of boiler fuel and bottom ash was observed during inspection. Lot of fine deposits were noticed near the storage yard which may carryover with rain water during rainy season and it may be deposited in nearby agricultural land.

The apprehensions and concerns raised in this para have been addressed vide our detailed reply to the notice under The Air (Prevention and Control of Pollution) Act, 1981 vide point no. 2 and point no. 3 above under The Water (Prevention and Control of Pollution) Act, 1974.

In case if you have any further clarifications, we are prepared to appear before your good selves with necessary documentary evidence at the time of hearing.

Thanking you,

Yours faithfully,
For ITC Limited – PSPD, Unit: Kovai


Pranav Sharma
Unit Head

Enclosed: Annexure - 1 to 3

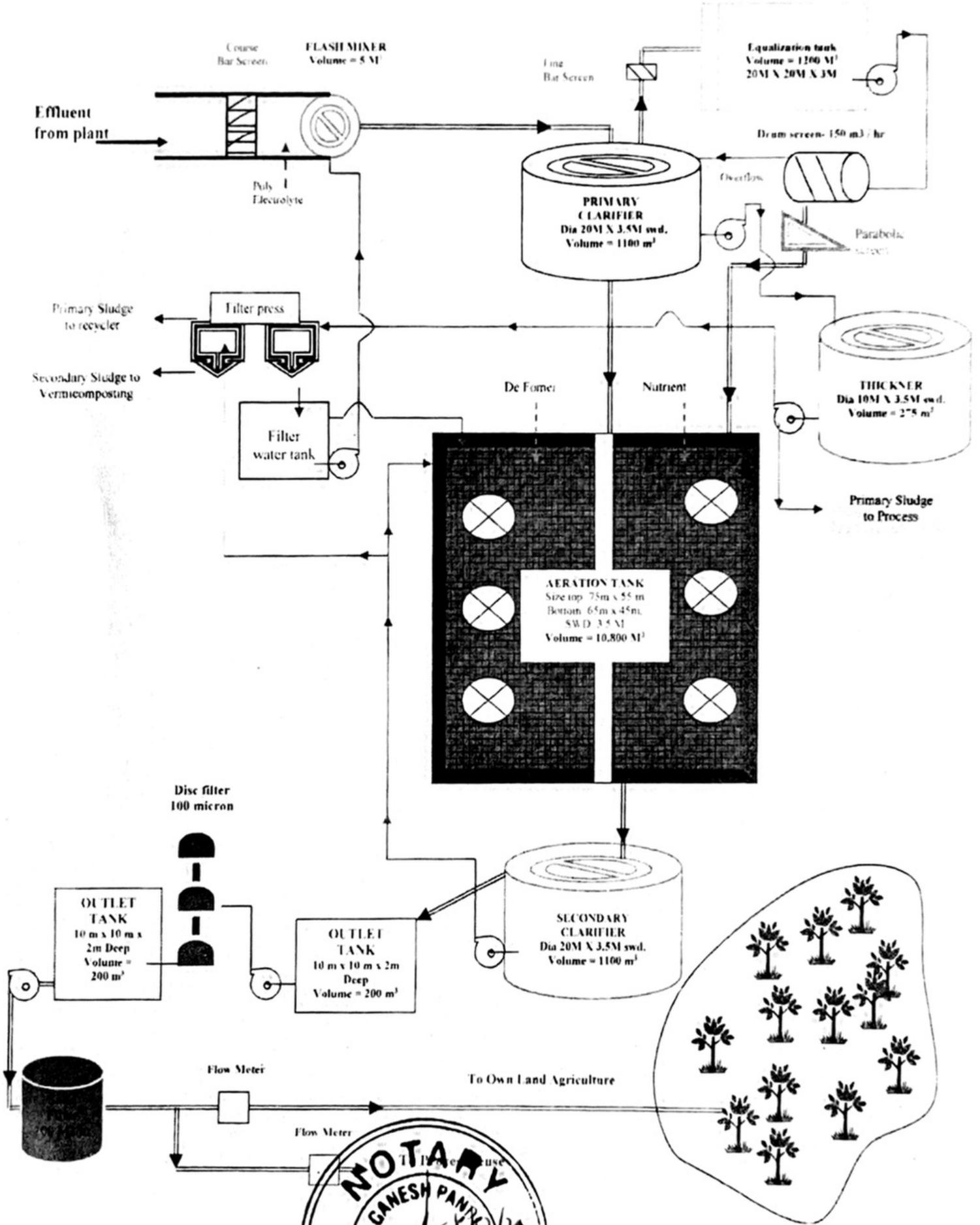


N. Pragnan



Annexure-1 [Water Act]

**EFFULENT TREATMENT PLANT
ITC Ltd., PSPD, UNIT- KOVAI**



NOTARY
 R. GANESH PANNAN
 COIMBATORE
 DISTRICT
 TAMIL NADU
 REG. NO. 1550/2013 Dt. 11.9.2013
GOVT. OF INDIA

H. Angur

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Annexure - 2 (Water Act)
Photos of New Compound Wall

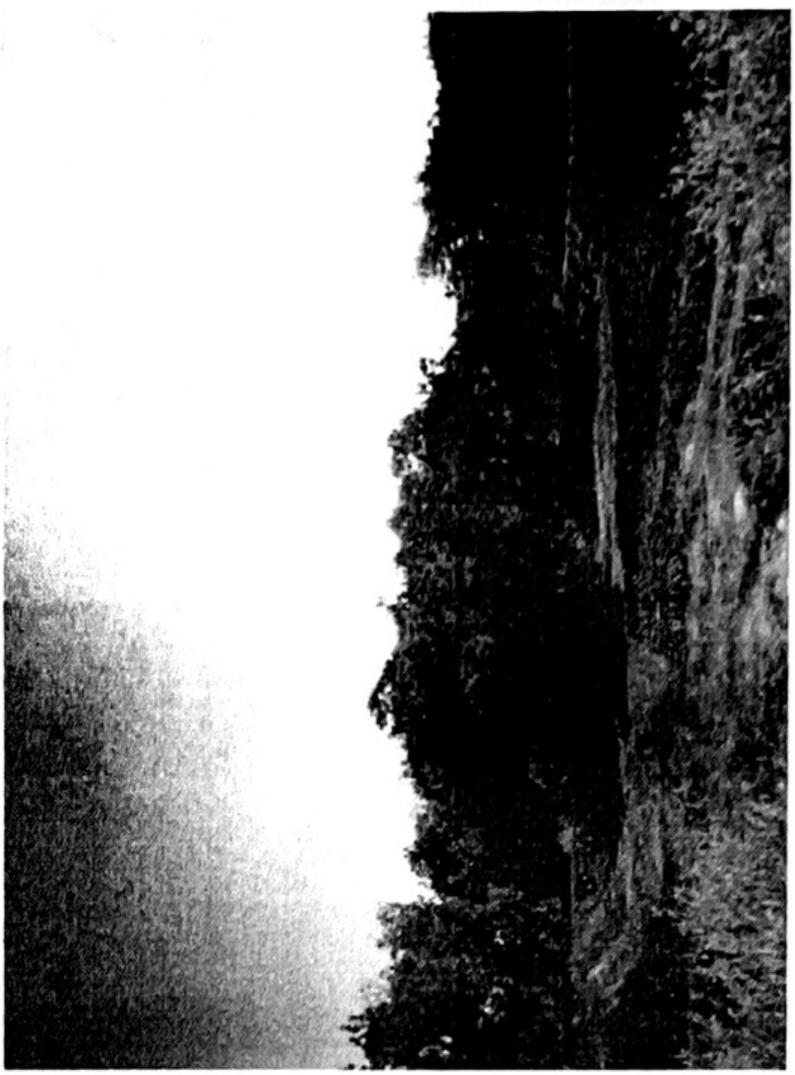


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N. Ganesh

Annexure - 3 (Water Act)
Photos of Rain Water Pond



NOTAR
R. GANESH PANDIAN
COIMBATORE
DISTRICT
TAMIL NADU
GOVT. OF INDIA

(Handwritten mark)

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI.

Original Application No. 26 of 2019(SZ)

E. Rajendran & another

...Applicant

Vs

The Ministry of Environment Forest
and Climate Change, rep. by Secretary,
New Delhi - 110003 & others.

...Respondents

INDEX

S.No	Description	Page No.
1.	JOINT COMMITTEE REPORT ON M/S. ITC LIMITED, PAPER BOARDS AND SPECIALTY BOARDS DIVISION, UNIT KOVAI AS PER THE ORDERS OF THE HON'BLE NGT(SZ), CHENNAI DATED 13.12.2019 & 27.01.2020.	1 - 11

Filed by

Thiru. C. Kasirajan,
Advocate, Chennai.



[Handwritten mark]

Joint Committee report on M/s. ITC Limited, Paper Boards and Specialty Boards Division, Unit: Kovai as per the orders of the Hon'ble National Green Tribunal (SZ), Chennai dated:13.12.2019 & 27.01.2020

1.0 Background:

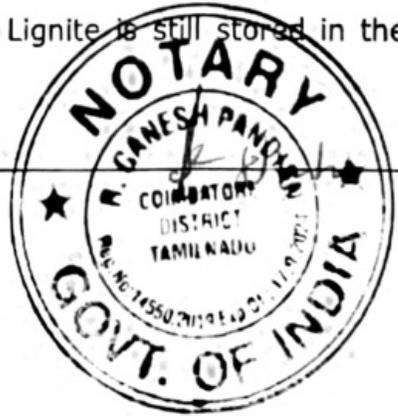
The Hon'ble National Green Tribunal, Southern Zone, Chennai in the matter of original application No. 26 of 2019 filed by Thiru. E. Rajendran and Thiru. E Ashok Raj Kumar against the unit of M/s. ITC Limited, directed on 13.12.2019 as;

"...we feel that it is appropriate to constitute a Joint Committee, consisting of a Senior Scientist from Central Pollution Control Board and Tamil Nadu Pollution Control Board to inspect the unit in question and consider whether the "land fill" has been properly maintained and they are complying all the norms and assess soil, water and air quality in that area and If there is any violation, they are directed to take appropriate action in accordance with law and submit a factual and action taken report within a period of one month to this tribunal...."

Accordingly, the joint committee inspection was carried out during January 06 to 08, 2020 and an interim report with following observations was submitted to Hon'ble NGT (SZ), Chennai.

- i. The unit's manufacturing activities were under operation.
- ii. The ETP was also under operation and the treated trade effluent was being discharged on land for irrigation purposes.
- iii. There is no discharge of either untreated or treated trade effluent outside the unit premises and confirmed with the Applicant Thiru. Ashok Raj Kumar. But he informed that during rainy season the rain water will flows from the unit premises.
- iv. On inspection of the irrigation fields owned by the unit, it was observed that lot of sludge deposits were found all along the irrigation channels, which is evident that the trade effluent was (bypassed) discharged without adequate treatment to remove the suspended solids.
- v. Biological sludge generated in ETP is used as manure after vermi composting. The yard provided for composting is not adequate. During inspection, it is found that the composting being carried out in the open land.
- vi. The unit has provided sheds for the storage facility of boiler fuel, which is found inadequate. Lignite is still stored in the open space near standby boiler area

Dr



which may carryover with rain water during rainy season and deposit in nearby agricultural land including applicant's land.

- vii. Previously, the unit had Secured land fill facility for storage of plastic wastes which was used to store plastic wastes. At present the unit has closed the secured landfill facility after disposal of dumped plastic waste to cement industries for co-processing. At present the unit has provided concrete platform near the process area for storage of plastic waste and sent to cement mill for co-processing. Closed landfill site is digged to verify plastic waste is completed removed or not and no plastic is found.
- viii. Applicant showed the old plastic waste dump area as bunds, which was found with full vegetation and no access to verify. Further the committee asked the industry representatives to dugout bund by JCB. As informed by the complainant, the plastic waste is found dumped after digging the bund.
- ix. The process waste sludge (binding chemicals) was found dumped in the area, where cleaning activities is being carried out for installation of solar power system.
- x. Cogeneration plant with Boiler 60 T/Hr was under repair work during inspection on 06.01.2020 and the unit was in operation by operating the stand by Boiler 44 TPH. Boiler 60 TPH was put in operation evening 3.00 pm on 06.01.2020. The APC measures such as ESP with Stack was under operation and the Boiler 44 TPH was stopped immediately.
- xi. OCEMS is not installed to the 44 TPH boiler stack.
- xii. Fugitive emission from storage yard of boiler fuel and bottom ash was observed during inspection. Lot of fine deposits were noticed near the storage yard which may carryover with rain water during rainy season and deposit in nearby agricultural land including applicant's land.
- xiii. The complainant informed that the seepage water from the industry was found during rainy season, which is due to the industry geographical location explained in point 2.2. So the industry shall provide concerted rain water harvesting pond around the premises to avoid seepage or can adopt any appropriate methods to avoid seepage water flowing to agriculture land.

Subsequently TNPCB has issued show cause notice under the Water (P&CP) Act 1974 and the Air (P&CP) Act 1981 to the industry on 10.01.2020.

Upon the request of the committee the Hon'ble National Green Tribunal (Southern Zone), Chennai considered the progress of the work done by the committee and granted time for filing the final report.



2.0 Detailed Analysis of Environmental Pollution:

The joint committee collected samples of water, soil, Air (source & Ambient) at various locations and results are submitted below:

i. Effluent Treatment Plant Samples:

S.No.	Parameters	Unit	ETP Inlet	Combined Treated Effluent (ETP Outlet and treated Sewage)	Treated effluent pumping tank (Used for irrigation on its own land)
1	pH @ 25°C		7.84	8.56	8.51
2	Conductivity	µs/cm	4160	2320	2330
3	Total Suspended Solids	mg/l	2688	16	22
4	Total Dissolved Solids	mg/l	3830	1452	1308
5	BOD for 3 days @ 270C	mg/l	580	10	8
6	COD	mg/l	3760	96	72
7	Ammonical Nitrogen	mg/l	<2.0	<2.0	<2.0
8	Total Kjeldahl Nitrogen	mg/l	5.6	<5.0	<5.0
9	Sulphide	mg/l	<1.0	<1.0	<1.0
10	Phenolic Compounds	mg/l	0.01	<0.001	<0.001
11	% Sodium	%	49	40	35
12	Iron Total	mg/l	1.99	0.26	0.33
13	Total Chromium	mg/l	0.2	<0.01	<0.01
14	Copper	mg/l	0.815	0.0312	0.0812
15	Zinc	mg/l	0.2956	0.1668	0.1347
16	Lead	mg/l	0.0319	<0.015	<0.015
17	Cadmium	mg/l	<0.0008	<0.0008	<0.0008
18	Nickel	mg/l	1.0728	0.0892	0.314
19	Manganese (as Mn)	mg/l	<0.01	<0.01	<0.01
20	Mercury (as Hg).	mg/l	0.27	<0.001	<0.001
21	AOX	mg/l	0.33	0.18	ND

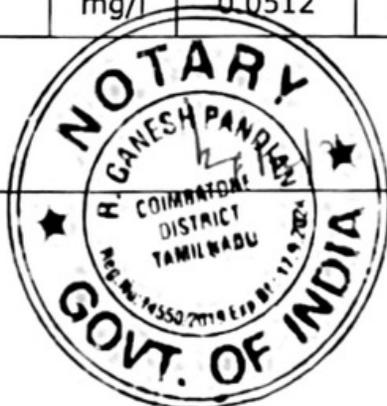


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The treated effluent parameters are within the limits prescribed by the TNPC Board. The analysis result of AOX confirmed that no bleaching activity is carried out by the industry.

ii. Ground and Surface Water Samples:

S.No.	Parameters	Unit	Bore well at Mr. Ashok Raj Kumar Thottam	Open well at Mr. Pettaiyan Thottam	Kumachiparai Odai Near Mr. Duraisamy Thottam	Open well at Mr. Duraisamy Thottam	Bore well at industry's irrigation land
1	pH @ 25°C		8.66	8.63	9.14	8.57	8.57
2	Conductivity	µs/cm	1414	1260	817	1592	1905
3	Total Suspended Solids	mg/l	4	4	6	6	4
4	Total Dissolved Solids	mg/l	1086	926	412	952	1240
5	BOD for 3 days @ 270C	mg/l	<2	<2	2	2	<2
6	COD	mg/l	8	8	8	8	8
7	Ammonical Nitrogen	mg/l	<2.0	<2.0	<2.0	<2.0	<2.0
8	Total Kjeldahl Nitrogen	mg/l	<5.0	<5.0	<5.0	<5.0	<5.0
9	Sulphide	mg/l	<1.0	<1.0	<1.0	<1.0	<1.0
10	Phenolic Compounds	mg/l	<0.001	<0.001	<0.001	<0.001	<0.001
11	% Sodium	%	19	23	39	35	44
12	Iron Total	mg/l	0.26	0.17	2.06	0.2	3.63
13	Total Chromium	mg/l	<0.05	<0.05	<0.05	<0.05	<0.05
14	Copper	mg/l	0.0465	0.0888	0.0612	0.0314	0.0319
15	Zinc	mg/l	0.0456	0.0564	0.0643	0.142	0.1586
16	Lead	mg/l	<0.015	<0.015	<0.015	<0.015	<0.015
17	Cadmium	mg/l	<0.0008	<0.0008	<0.0008	<0.0008	<0.0008
18	Nickel	mg/l	0.0512	0.0632	0.0932	0.0814	0.0592



The ground and surface water parameters are within the permissible limits for irrigation and livestock. At present no contamination of ground/surface water observed due to industrial activity. In all the ground/surface water samples, Nickel is found slightly higher than the drinking water standard 0.02 mg/l, which may be due to natural resources.

iii. **Soil Samples:**

S. No.	Parameters	Unit	Mr.Ashok Raj Kumar Thottam	Old storage yard of ETP sludge	Old storage yard of bottom ash	Sediment from Kumachiparai Odai	Soil sample near odai	Industry's irrigation land with treated effluent	irrigation land with fresh water (Reference Soil Sample)
1	pH		7.82	6.87	6.76	7.91	8.07	7.85	8.08
2	EC	ds m ⁻¹	0.36	0.39	0.36	0.92	0.47	0.57	0.45
3	Organic Carbon	%	0.97	0.86	0.45	0.79	0.35	0.79	0.77
4	Available Nitrogen	kg/ha	56	89.6	78.4	123.2	145.6	212.8	190.4
5	Available Phosphorus	kg/ha	10	11	10	10	11	12	12
6	Available Potassium	kg/ha	112	64	94	221	174	218	192
7	Available Iron	mg/kg	20.76	28.92	8.42	3.51	11.74	5.5	9
8	Available Manganese	mg/kg	38.84	20.58	15.2	27.56	39.74	25.74	34.36
9	Available Zinc	mg/kg	9.81	4.43	6.17	12.06	10.88	9.62	10.34
10	Available Copper	mg/kg	14.34	9.45	8.48	4.48	12.95	11.92	3.73
11	Total Cadmium	mg/kg	BDL	BDL	BDL	BDL	BDL	BDL	BDL
12	Total Chromium	mg/kg	19.6	20	12.4	36	11.9	18.3	BDL
13	Total Lead	mg/kg	3.1	BDL	1.11	BDL	2.3	BDL	BDL
14	Total Nickel	mg/kg	2.8	BDL	BDL	9.1	16.9	4.9	BDL
15	Total Mercury	mg/kg	0.1	0.01	0.01	0.01	0.008	0.03	0.01
16	Sodium Adsorption Ratio	mg/kg	5.22	11.53	5.75	10.28	9.9	17.18	11.91



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The industry is carrying out cultivation with treated effluent and fresh water. The soil samples were collected by the committee in both the locations as well as in the complainant's cultivation land and odai. The soil sample collected in the field using fresh water is taken as a reference soil sample to compare with the quality of soil samples collected in other locations. The soil samples analysis report ascertained that there are traces of heavy metals presence as compared with the reference sample. The traces of heavy metals may be due to the past discharge of partial/untreated effluent. However the presence of heavy metals in the soil is lesser as compared with the compost standards for agricultural purpose, which indicates that there is no damage in the soil.

iv. Source Emission Samples:

The source emission monitoring for the parameters PM, SO₂ & NO₂ was carried out in the stack attached to 60 TPH boiler installed at co-gen power plant. The analysis result reveals that SO₂ and NO₂ are exceeding the prescribed standard.

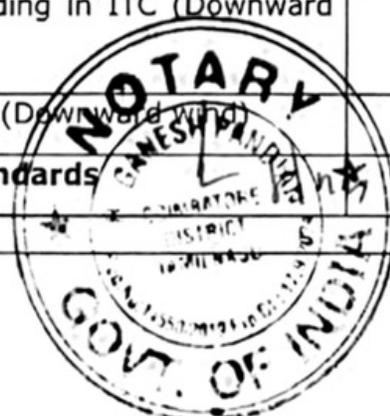
Parameters	Without 6% O ₂ Correction			Without 6% O ₂ Correction		
	PM	SO ₂ *	NO ₂ *	PM	SO ₂	NO ₂
60 TPH boiler (Co-gen power plant)	22.0 mg/Nm ³	922 mg/m ³	191 mg/m ³	47.5 mg/Nm ³	1982.3 mg/m ³	410.65 mg/m ³
Standards	-	-	-	150 mg/Nm ³	600 mg/Nm ³	300 mg/Nm ³

* Measured through flue gas analyzer

v. Ambient Air Quality:

The Ambient Air Quality survey was carried in three locations downward and upward wind direction for 24 hours. The report shows PM₁₀, SO₂ & NO₂ are within the notified ambient air quality standards.

Parameters	PM ₁₀ µg/m ³	SO ₂ µg/m ³	NO ₂ µg/m ³
Locations			
Applicant's agriculture land (Upward wind)	37.0	<4.0	14.0
R&D Building in ITC (Downward wind)	37.0	4.0	16.0
Near ETP (Downward wind)	49.0	6.0	16.0
AAQ Standards	100	80	80



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3.0 Status of Online Continuous Emission/Effluent Monitoring System (OCEMS)

The unit has installed Online Continuous Emission Monitoring System in the 60 TPH boiler for the parameters PM, SO₂ and NO₂ and only the parameter PM is connected to TNPCB server. This system installed is not in appropriate location which is nearer to the disturbance point.

The unit has informed that the Online Continuous Emission Monitoring System is not installed in the standby 44 TPH boiler and this boiler is being operated only whenever required.

As per the CPCB's OCEMS guidelines, the entire industrial boiler mandate to install Online Continuous Emission Monitoring System for the parameters PM, SO₂ and NO₂. The deadline given by the CPCB for installation of OCEMS and connectivity to server was till February 2017.

The unit has installed Online Continuous Effluent Monitoring System for the parameters pH, TSS, COD, BOD, Temperature and outlet flow and connected to CPCB and TNPCB server.

4.0 Environmental Compensation Calculation

The following major violations are considered for the calculation of Environmental compensation:

- 1. Non installation of OCEMS in 44 TPH boiler.
- 2. Dumping of plastic wastes inside the unit premises.
- 3. Exceedance of source emission parameters.
- 4. Traces of heavy metals present in soil due to past discharge of partially/untreated effluent.

The joint committee adopted CPCB methodology for assessing Environmental compensation for the unit of M/s. ITC Limited, Paper Boards and Specialty Boards Division, Unit: Kovai Red-Large Category Pulp & Paper (waste paper based without bleaching process to manufacture Kraft paper) unit.

Environmental Compensation formula = PI x N x R x S x LF

PI – Pollution Index for Pulp & Paper unit – **80 (Red category)**

As per the B.P.No.06 dated 02.08.2016 vide serial No. 1018 - Pulp & Paper (waste paper based without bleaching process to manufacture Kraft paper)



comes under Red category and the unit GFA is 47478.68 Lakhs comes under large classification (Red- Large).

N – Number of days for which violation took place - **1106 days**
(01.03.2017 to 11.03.2020) Period taken after the deadline (28.02.2017) for installation of Online Continuous Emission Monitoring System to the boiler stack issued by the CPCB

R – Factor in Rupees – **Rs. 250/-**

S – Scale of operation - **1.5 for large scale unit**

LF – Thekkampatty Village Panchayat Population is 12,414 as per the 2011 census which is less than one million, Hence **location factor – 1**

Hence , EC = 80 x 1106 x 250 x 1.5 x 1
= Rs. 331.80 Lakhs

Interim Environmental Compensation calculated for 1106 days is Rs. 331.80 Lakhs.

Environmental compensation of Rs. 30,000/- per day w.e.f 12.03.2020 shall be imposed until compliance.

5.0 Summary and Recommendations: (including interim report observations)

- i. The analysis results of the samples collected by the committee shows no significant impact in the soil and ground water/surface water.
- ii. The traces of heavy metals present in the soil samples are less as compared with compost manure quality. However this indicates the past discharge of partially/untreated effluent. The industry should ensure no discharge of partially/untreated effluent.
- iii. The unit has installed flow meter at outlet of ETP only. Flow meter shall be provided at inlet of ETP in order to quantify total effluent generation and treated. These flow meters shall be connected to the online servers of CPCB and TNPCCB.
- iv. OCEMS installed in 60 TPH boiler for the parameters PM, SO₂ and NO₂. SO₂ and NO₂ analyzer shall be provided with calibration facility and same be connected



to CPCB and TNPCB server. OCEMS shall be placed in appropriate location as per emission regulation part-III.

- v. OCEMS shall be installed in 44 TPH boiler for the parameters PM, SO₂ & NO₂ with gaseous calibration facility and connect to CPCB & TNPCB server.
- vi. Proper processing and storage facilities shall be provided for vermi composting of biological sludge.
- vii. Adequate storage facilities shall be provided for the boiler fuel (lignite & biomass) and avoid open storage. This facility shall be provided proper drainage system.
- viii. Adequate control measures shall be provided and maintain regularly to avoid fugitive emission from storage yard of boiler fuel and bottom ash.
- ix. Open dumping of plastic waste and process waste sludge (binding chemicals) found during committee visit shall be removed and disposed properly. The industry shall ensure no open dumping of wastes.
- x. The complainant informed that the seepage water from the industry was found during rainy season, which is due to the industry geographical location. So the industry shall provide garland drain system around the premises and connect to concerted rain water harvesting pond to avoid seepage or can adopt any appropriate methods to avoid seepage water flowing to agriculture land.
- xi. The interim environmental compensation calculated till 11.03.2020 is Rs. 331.80 Lakhs and thereon each day Rs.30,000/- shall be levied until compliance.

[Signature]
15.03.20

P. Asokan
Joint Chief Environmental Engineer(M)
Tamil Nadu pollution Control Board
Coimbatore

[Signature]

R. Rajkumar
Scientist D
Central pollution Control Board
Regional Directorate (South), Bengaluru



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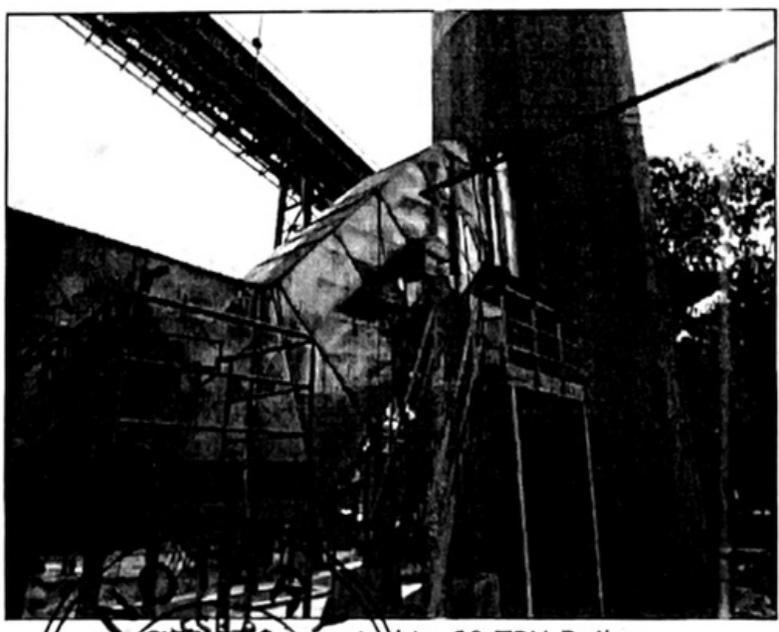
Photographs



Plastic Waste Dump



Bio Sludge (open composting)



EMS connected to 60 TPH Boiler



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Fuel Stacking Area

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BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE, CHENNAI.

Original Application No. 26 of 2019(sz)

E. Rajendran & another

...Applicant

Vs

The MoEF, rep. by Secretary,
New Delhi 110003 & others.

...Respondents

JOINT COMMITTEE REPORT ON
M/S. ITC LIMITED, PAPER BOARDS
AND SPECIALTY BOARDS DIVISION,
UNIT KOVAI AS PER THE ORDERS
OF THE HON'BLE NGT(SZ),
CHENNAI DATED 13.12.2019 &
27.01.2020.

Advocate for Respondents No. 4,5 & 6
Thiru. Kasirajan
Advocate, Chennai.



Date:16.03.2020.

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TAMILNADU POLLUTION CONTROL BOARD



R6

PROCEEDINGS NO.T1/ TNPCB/F.0038/CBN/RL/ W&A/2020 DATED: 17.03.2020

SUB: TNPCB – Industries – M/s. ITC LIMITED, PSPD UNIT KOVAI , S.F.No. 241/1 etc., Thekkampatty village, Mettupalayam Taluk and Coimbatore District – Hon'ble NGT order dated 13.12.2019 in the O.A.No.26 of 2019 (SZ)- Joint Committee report- Certain directions under Section 33(A)of the Water (Prevention and Control of Pollution) act, 1974 as Amended and Section 31A of the Air (Prevention and Control of Pollution) act, 1987 as Amended - Issued – Regarding.

REF: 1. Hon'ble NGT order dated 13.12.2019 in the O.A.No.26 of 2019 (SZ).
2. Proc.No.F.CBS 0038/DEE/TNPCB/CBN/RL/W&A/2020/dated 10.01.2020.
3. Joint Committee report as per the orders of the Hon'ble National Green Tribunal (SZ), Chennai dated 13.12.2019 & 27.01.2020
4. DEE's Letter No. TNPCB/JCEE/F.200/NGT/CBE/2020 dt:13.03.2020.

Whereas, the Hon'ble National Green Tribunal, Southern Zone, Chennai in the matter of original application No. 26 of 2019 against the unit of M/s. ITC Limited, directed on 13.12.2019 as;

"...we feel that it is appropriate to constitute a Joint Committee, consisting of a Senior Scientist from Central Pollution Control Board and Tamil Nadu Pollution Control Board to inspect the unit in question and consider whether the "land fill" has been properly maintained and they are complying all the norms and assess soil, water and air quality in that area and If there is any violation, they are directed to take appropriate action in accordance with law and submit a factual and action taken report within a period of one month to this tribunal..."

Whereas, the joint committee was constituted and joint inspection was carried out during January 06th to 08th, 2020 and an interim report with observations was submitted to Hon'ble NGT (SZ), Chennai.

Whereas, based on the joint inspection of the unit on 06.01.2020 & 07.01.2020, Show Cause Notice under Water (Prevention & Control of Pollution)Act and Air (Prevention & Control of Pollution) Act was issued to the unit vide reference second cited for the reasons stated therein.

Whereas, the Joint Committee collected the samples of water (from ETP, Ground water & Surface Water), soil, Air (source & Ambient) at various locations. The committee found that the treated effluent parameters are within the limits prescribed by the TNPC Board and in all the ground/surface water samples, Nickel is found slightly higher than the drinking water standard 0.02 mg/l, which may be due to natural resources.

No. 7, MOHAI SALAI, CHENNAI - 600 032.
Tel : 22353134, 22353135, 22353136, 22353137, 22353138, 22353139, 22343140, 22353141
Email : tnpcb@tnpcb.gov.in Web : www.tnpcb.gov.in



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Whereas, the Joint Committee reported that the soil samples analysis report ascertained that there are traces of heavy metals presence as compared with the reference sample. The traces of heavy metals may be due to the past discharge of partial/untreated effluent.

Whereas, the Joint Committee reported that from the analysis of source emission monitoring in the stack attached to 60 TPH boiler installed at co-gen power plant, the result reveals that SO₂ and NO₂ are exceeding the prescribed standard. The unit has installed Online Continuous Emission Monitoring System in the 60 TPH boiler for the parameters PM, SO₂ and NO₂ and only the parameter PM is connected to TNPCB server. This system installed is not in appropriate location which is nearer to the disturbance point.

Whereas, the Joint Committee reported that the unit has not installed Online Continuous Emission Monitoring System in the standby 44 TPH boiler and this boiler is being operated only whenever required. As per the CPCB's OCEMS guidelines, the entire industrial boiler mandate to install Online Continuous Emission Monitoring System for the parameters PM, SO₂ and NO₂. The deadline given by the CPCB for installation of OCEMS and connectivity to server was till February 2017.

Whereas, based on the violations by the industry, i.e. non installation of OCEMS in 44 TPH boiler, dumping of plastic wastes inside the unit premises, exceedance of source emission parameters and traces of heavy metals present in soil due to past discharge of partially/untreated effluent, the Joint Committee has furnished recommendations for levying Interim Environmental compensation calculated till 11.03.2020 (Rs. 331.80 Lakhs and thereon each day Rs.30,000/- until compliance) along with certain directions to be complied by the unit.

Therefore, in exercise of the powers conferred under Section 33 A of Water (P&CP) Act 1974 as amended in 1988 and Section 31A of the Air (Prevention and Control of Pollution) act, 1987 as amended, Board issues the following direction to the unit of M/s. ITC LIMITED, PSPD UNIT KOVAI , S.F.No. 241/1 etc., Thekkampatty village, Mettupalayam Taluk and Coimbatore District to comply the following conditions:

1. The unit shall remit the interim environmental compensation of an amount of Rs. 331.80 Lakhs calculated till 11.03.2020 for violations made by the unit.
2. The unit shall remit an amount of Rs.30,000 /day w.e.f 12.03.2020 until compliance of the following:





TAMILNADU POLLUTION CONTROL BOARD



- i. The industry shall ensure no discharge of partially/untreated effluent in to the soil.
- ii. The industry shall provide flow meter at inlet of ETP in order to quantify total effluent generation and treated and its shall be connected to the online servers of CPCB and TNPCB.
- iii. The industry shall provide calibration facility in the OCEMS installed in 60 TPH boiler for the parameters PM, SO₂ and NO₂. SO₂ and NO₂ analyzer and same be connected to CPCB and TNPCB server.
- iv. The OCEMS attached in the 60 TPH Boiler shall be placed in appropriate location as per emission regulation part-III.
- v. The industry shall install OCEMS in 44 TPH boiler for the parameters PM, SO₂ & NO₂ with gaseous calibration facility and connect to CPCB & TNPCB server.
- vi. The industry shall provide proper processing and storage facilities for vermi composting of biological sludge.
- vii. The industry shall provide adequate storage facilities for the boiler fuel (lignite & biomass) and avoid open storage. This facility shall be provided with proper drainage system.
- viii. The industry shall provide adequate control measures and maintain regularly to avoid fugitive emission from storage yard of boiler fuel and bottom ash.
- ix. The industry shall remove the open dumping of plastic waste and process waste sludge (binding chemicals) found during committee visit and dispose it properly. The industry shall ensure no open dumping of wastes at any time.
- x. The industry shall provide garland drain system around the premises and connect to concerted rain water harvesting pond to avoid seepage or can adopt any appropriate methods to avoid seepage water flowing to agriculture land.

Failure to comply with the above said directions, will lead to issue of further directions for closure and stoppage of power supply to your unit under section 33 A of Water (P&CP) Act 1974 as amended in 1988 and Section 31A of the Air (Prevention and Control of Pollution) act, 1987 as amended.

The receipt of the proceeding shall be acknowledged.

S. Sripada
18/12/20
For Chairman
MOS/11
18.12.20

No. 76, COURT STREET, CHINDY, CHENNAI - 600 032.
Tel : 22353134, 22353135, 22353136, 22353137, 22353138, 22353139, 22343140, 22353141
Email : tnpcb@tnpcb.gov.in, tnpcb@vsnl.com, tnpcb@rediffmail.com, tnpcb@rediffmail.com
Web : www.tnpcb.gov.in



To :

The Head-Operations,
M/s. ITC LIMITED, PSPD UNIT KOVAI ,
Thekkampatty village,
Vivekanandapuram P.O.
✓ Meitupalayam Taluk , Coimbatore District
Pin-641113

Copy to:

1. The Joint Chief Environmental Engineer (M),
Tamil Nadu Pollution Control Board,
Coimbatore.
2. The District Environmental Engineer,
Tamil Nadu Pollution Control Board,
Coimbatore North.
3. Law Section.
4. Technical file.



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W.P. No 10495 of 2020

IN THE HIGH COURT OF JUDICATURE AT MADRAS

DATED : 21.08.2020

CORAM

THE HON'BLE MR.JUSTICE M.M.SUNDRESH
and
THE HON'BLE MRS.JUSTICE R.HEMALATHA

W.P.No.10495 of 2020
and W.M.P.Nos.13720 & 13721 of 2020

ITC Limited,
having its manufacturing unit at SF No.423/5,
Vivekanandapuram, Thekkampatty Village,
Mettupalayam Taluk, Coimbatore – 641 113. ... Petitioner

Vs.

- 1.The District Environmental Engineer,
Tamil Nadu Pollution Control Board,
Coimbatore North,
Opp. Fire Station,
Kavundampalayam,
Coimbatore.
- 2.The Tamil Nadu Pollution Control Board,
No.76, Mount Salai, Guindy, Chennai – 600 032.
Represented by its Chairman ... Respondents

Writ petition filed under Article 226 of the Constitution of India
praying for a Writ of Certiorari calling for the records of the 2nd respondent

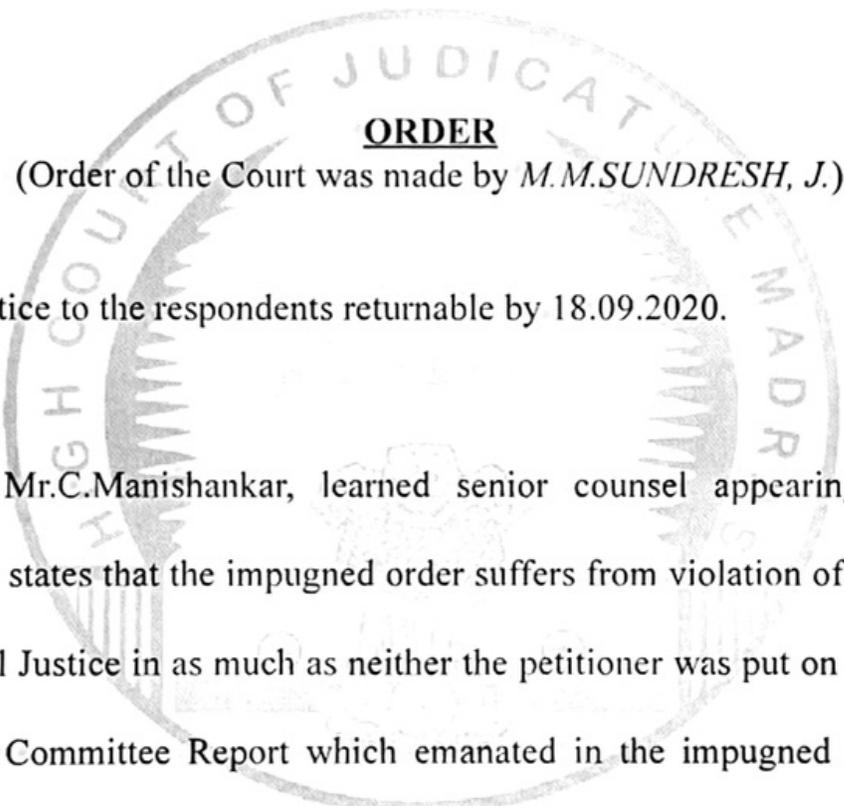
Page 1 of 4



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ending with proceedings No. T1/TNPCB/F.0038/CBN/RL/W &A/2020 dated 17.3.2020.

For Petitioner .. Mr.C.Manishankar
SC for Mr.K.Krishnamoorthy



ORDER

(Order of the Court was made by *M.M.SUNDRESH, J.*)

Notice to the respondents returnable by 18.09.2020.

2. Mr.C.Manishankar, learned senior counsel appearing for the petitioner states that the impugned order suffers from violation of principles of Natural Justice in as much as neither the petitioner was put on notice nor the Joint Committee Report which emanated in the impugned order was given. Further, in the impugned order the petitioner has been asked to pay huge sum of fine, thus the impugned order has civil consequences.

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3. Considering the above, there shall be an order of interim stay, however the petitioner shall comply with the defects pointed out in the



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W.P. No 10495 of 2020

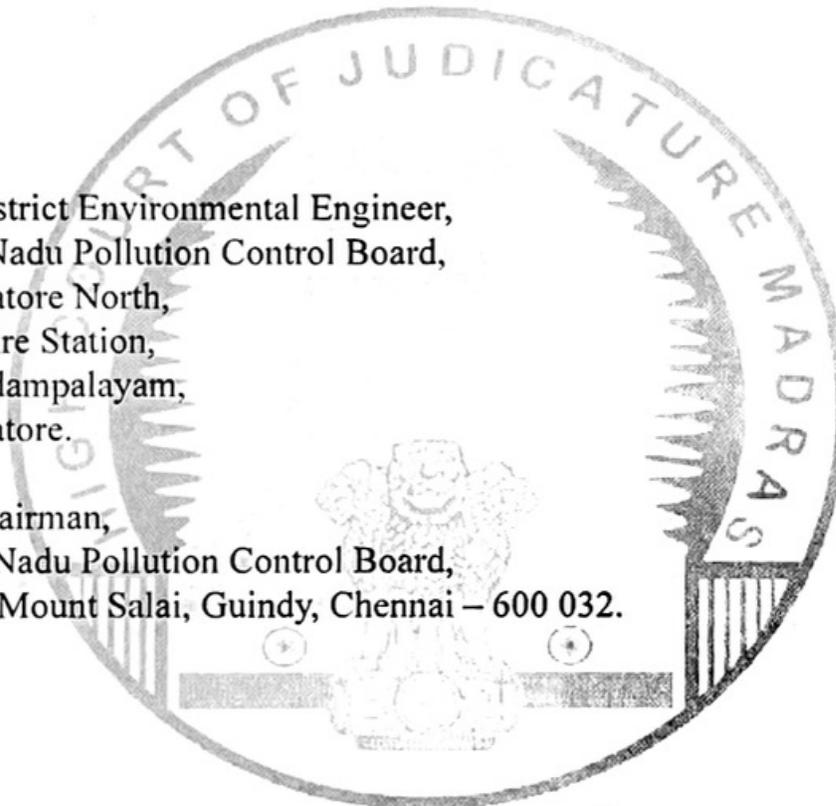
meanwhile. The submission made by the learned senior counsel that the defects pointed out are nearing compliance stands recorded.

(M.M.S., J.) (R.H., J.)
21.08.2020

JRL/kk

To

1. The District Environmental Engineer,
Tamil Nadu Pollution Control Board,
Coimbatore North,
Opp. Fire Station,
Kavundampalayam,
Coimbatore.
2. The Chairman,
Tamil Nadu Pollution Control Board,
No.76, Mount Salai, Guindy, Chennai – 600 032.



सत्यमेव जयते

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Page 3 of 4

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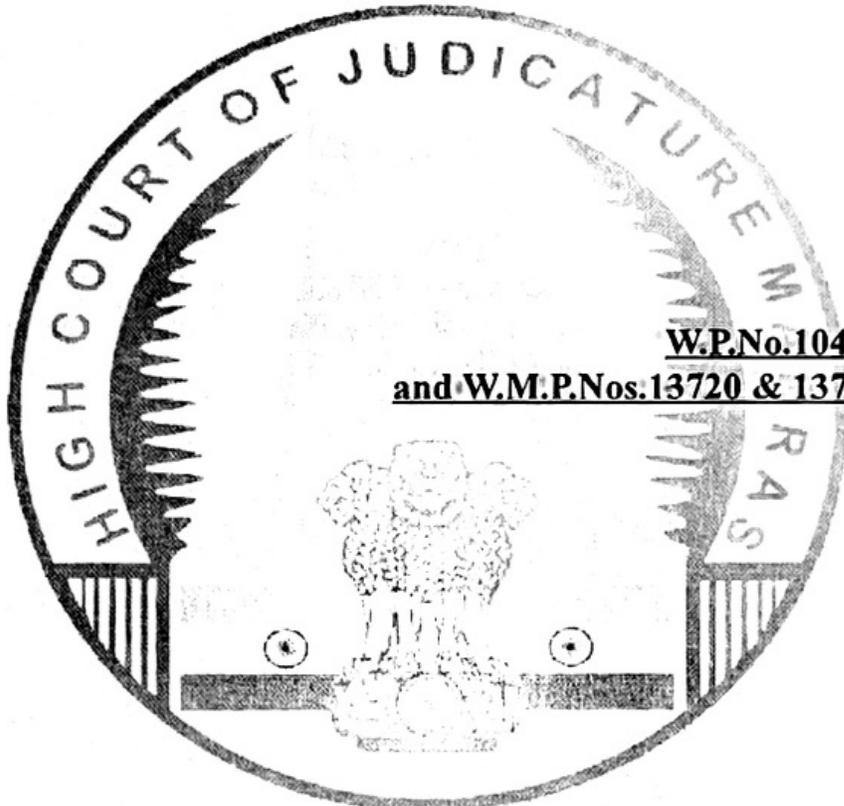
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W.P. No 10495 of 2020

M.M.SUNDRESH, J.
and
R.HEMALATHA, J.

JRL/kk



W.P.No.10495 of 2020
and W.M.P.Nos.13720 & 13721 of 2020



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21.08.2020

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TAMIL NADU POLLUTION CONTROL BOARD

CONSENT ORDER NO. 170828064955

DATED: 03/05/2017.

PROCEEDINGS NO.T12/TNPCB/F.0038CBN/RL/CBN/A/2017 DATED: 03/05/2017

SUB: Tamil Nadu Pollution Control Board - RENEWAL OF CONSENT -M/s. ITC LIMITED, PSPD UNIT KOVAI , S.F.No. 241/1 , 409/1, 409/2A, 409/2B, 409/2C, 409/2D, 409/2E, 409/2F, 409/2G, 409/2H, 409/2I, 410/2B, 410/3A, 410/3B, 411/1B, 411/1C, 411/1D, 412/1E, 412/1F, 412/2, 412/3C, 412/3D1, 412/3D2, 412/3D3, 414/2A, 414/2C 414/2D, 414/2E, 415/2, 415/3A, 415//3B, 415/4, 416/2A, 418, 421/1, 421/2, 422/1A, 422/1B, 422/1C, 422/2, 423/1, 423/2, 423/3, 423/4, 423/5, 424/1, 424/2, 424/3, 424/4, 426/1B, 426/1C, 426/1D, 426/2, 426/3A, 426/3B, 426/3C, 427/1, 427/2, 427/5A, 97/3, 133/2E2, 132/2C, 141/2B, 141/2C, 877/2A2, 877/2B, 877/2C, 878/2, 879/2, 914, 921/1A, 921/1B, 922/2, 922/1, 923/1A, 923/2A, 923/2B, 923/2C, 924/1, 924/2, 925/1, 925/2, 926/1, 927/1A, 930, 932/1, 936/1, 938/1, 938/2, 938/3, 939/1A1, 939/1A2, 940, 941/1, 941/2, 942/1, 942/2, 943/1A, 943/1B, 848, 849, 850, 851, 885, 889/2A, 889/2B, 891/2B2, 890/2A, 890/2B, 892, 893, 894, 895, 899, 891/2B1, 891/2A2, 884/1, 775/5, 775/6, 776/1, 776/2, 776/3, 776/4A, 776/5A, 777/1, 777/2, 778/2A, 778/2B, 778/2C, 778/2DC, 778/2E2, 778/2F2, 779, 844/1, 844/2, 962, 921/2, 1011, 1012, 900/1, 901/2, 902/1, 904/1B, 900/2C, 901/1A, 900/2A, 901/1C, 900/2B, 901/1B, THEKKAMPATTY village, Mettupalayam Taluk and Coimbatore District - Renewal of Consent for the operation of the plant and discharge of emissions under Section 21 of the Air (Prevention and Control of Pollution) Act, 1981 as amended in 1987 (Central Act 14 of 1981) -Issued- Reg.

REF: 1.Proc. No.T12/TNPCB/F.0038CBN/RL/CBN/W&A/2016 DATED: 11/08/2016
2.IR.No : F.0038CBN/RL/AEE/CBN/2017 dated 10/04/2017

RENEWAL OF CONSENT is hereby granted under Section 21 of the Air (Prevention and Control of Pollution) Act, 1981 as amended in 1987 (Central Act 14 of 1981) (hereinafter referred to as "The Act") and the rules and orders made there under to

M/s.ITC LIMITED, PSPD UNIT KOVAI,

S.F.No. 241/1 , 409/1, 409/2A, 409/2B, 409/2C, 409/2D, 409/2E, 409/2F, 409/2G, 409/2H, 409/2I, 410/2B, 410/3A, 410/3B, 411/1B, 411/1C, 411/1D, 412/1E, 412/1F, 412/2, 412/3C, 412/3D1, 412/3D2, 412/3D3, 414/2A, 414/2C 414/2D, 414/2E, 415/2, 415/3A, 415//3B, 415/4, 416/2A, 418, 421/1, 421/2, 422/1A, 422/1B, 422/1C, 422/2, 423/1, 423/2, 423/3, 423/4, 423/5, 424/1, 424/2, 424/3, 424/4, 426/1B, 426/1C, 426/1D, 426/2, 426/3A, 426/3B, 426/3C, 427/1, 427/2, 427/5A, 97/3, 133/2E2, 132/2C, 141/2B, 141/2C, 877/2A2, 877/2B, 877/2C, 878/2, 879/2, 914, 921/1A, 921/1B, 922/2, 922/1, 923/1A, 923/2A, 923/2B, 923/2C, 924/1, 924/2, 925/1, 925/2, 926/1, 927/1A, 930, 932/1, 936/1, 938/1, 938/2, 938/3, 939/1A1, 939/1A2, 940, 941/1, 941/2, 942/1, 942/2, 943/1A, 943/1B, 848, 849, 850, 851, 885, 889/2A, 889/2B, 891/2B2, 890/2A, 890/2B, 892, 893, 894, 895, 899, 891/2B1, 891/2A2, 884/1, 775/5, 775/6, 776/1, 776/2, 776/3, 776/4A, 776/5A, 777/1, 777/2, 778/2A, 778/2B, 778/2C, 778/2DC, 778/2E2, 778/2F2, 779, 844/1, 844/2, 962, 921/2, 1011, 1012, 900/1, 901/2, 902/1, 904/1B, 900/2C, 901/1A, 900/2A, 901/1C, 900/2B, 901/1B, THEKKAMPATTY village, Mettupalayam Taluk, Coimbatore District.

Authorizing the occupier to operate the industrial plant in the Air Pollution Control Area as notified by the Government and to make discharge of emission from the stacks/chimneys.

This is subject to the provisions of the Act, the rules and the orders made there under and the terms and conditions incorporated under the Special and General conditions stipulated in the Consent Order issued earlier and subject to the special conditions annexed



[Handwritten Signature]

This RENEWAL OF CONSENT is valid for the period ending March 31, 2022

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Member Secretary,
Tamil Nadu Pollution Control Board,
Chennai



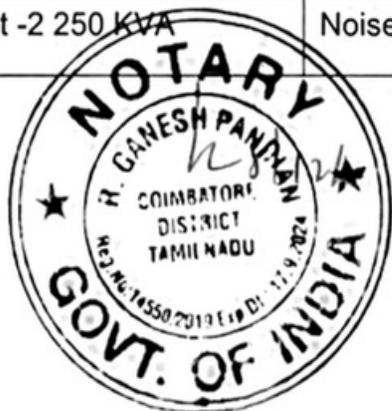
Signature

1. This renewal of consent is valid for operating the facility for the manufacture of products (Col. 2) at the rate (Col. 3) mentioned below. Any change in the products and its quantity has to be brought to the notice of the Board and fresh consent has to be obtained.

Sl. No.	Description	Quantity	Unit
Product Details			
1.	DUPLEX BOARD, ART BOARD, CROMO BOARD	10000	Tons / month
2.	POWER	8	MWHR
By-Product Details			
1.	NOT APPLICABLE	0	NOT APPLICABLE

2. This renewal of consent is valid for operating the facility with the below mentioned emission/noise sources along with the control measures and/or stack. Any change in the emission source/control measures/change in stack height has to be brought to the notice of the Board and fresh consent/Amendment has to be obtained.

I Point source emission with stack :				
Stack No.	Point Emission Source	Air pollution Control measures	Stack height from Ground Level in m	Gaseous Discharge in Nm ³ /hr
1	CAPTIVE POWER PLANT BOILER 60T/HR ESP with stack 1	ESP with stack	84	175000
2	BOILER 44 T/Hr (stand by)	ESP with stack	67	90500
3	DG SET 250 KVA (NEAR BOARD MACHINE)	Acoustic enclosures with stack	24	1645
4	DG SET 250 KVA (NEAR POWER PLANT)	Acoustic enclosures with stack	8.2	1100
5	Coal / Bio fuel bunker	Bag Filters with stack	9.9	20000
6	Coal / Bio fuel transfer point	Bag Filters with stack	9.9	15000
II Fugitive/Noise emission :				
Sl. No.	Fugitive or Noise Emission sources	Type of emission	Control measures	
1.	COAL / BIO FUEL BUNKER	Fugitive	Bag Filter	
2.	COAL/BIO-FUEL TRANSFER POINT	Fugitive	Bag Filter	
3.	DG Set-1 250 KVA	Noise	Acoustic Enclosure	
4.	DG set -2 250 KVA	Noise	Acoustic Enclosure	



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Additional Conditions:

1. The unit shall operate and maintain all the air pollution control measures efficiently and continuously so as to achieve the standards as per Ministry of Environment and Forest, Notification dated:16.11.2009.
2. The unit shall ensure that Noise emission from the Industrial plant shall satisfy the ANL standards prescribed by the Board.
3. The unit shall conduct AAQ/SM/ANL through TNPCB lab periodically and furnish ROA of the same to the Board.
4. The unit shall periodically calibrate the online monitors provided to monitor the parameter PM at boiler stack and ensure that continuous data is provided to Care Air Centre of TNPCB, Chennai at all times.
5. The boiler of 44 TPH shall be used as standby only.
6. In case of revision of consent fee by the Government, the unit shall remit the difference in amount within one month from date of notification. Failing to remit the consent fee, this consent order will be withdrawn without any notice and further action will be initiated against the unit as per law.

**Member Secretary,
Tamil Nadu Pollution Control Board,
Chennai**

To

M/s.ITC LIMITED, PSPD UNIT KOVAI,
Thekkampatty Village, Vivekanandapuram.P.O., Mettupalayam Taluk, Coimbatore District,
Pin: 641113

Copy to:

- 1.The Commissioner, KARAMADAI-Panchayat Union, Mettupalayam Taluk, Coimbatore District .
2. The District Environmental Engineer, Tamil Nadu Pollution Control Board, COIMBATORE NORTH.
3. The JCEE-Monitoring, Tamil Nadu Pollution Control Board, Coimbatore.
4. File

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TAMIL NADU POLLUTION CONTROL BOARD

CONSENT ORDER NO. 170818064955 DATED: 03/05/2017.

PROCEEDINGS NO.T12/TNPCB/F.0038CBN/RL/CBN/W/2017 DATED: 03/05/2017

SUB: Tamil Nadu Pollution Control Board - RENEWAL OF CONSENT – M/s. ITC LIMITED, PSPD UNIT KOVAI , S.F.No. 241/1 , 409/1, 409/2A, 409/2B, 409/2C, 409/2D, 409/2E, 409/2F, 409/2G, 409/2H, 409/2I, 410/2B, 410/3A, 410/3B, 411/1B, 411/1C, 411/1D, 412/1E, 412/1F, 412/2, 412/3C, 412/3D1, 412/3D2, 412/3D3, 414/2A, 414/2C 414/2D, 414/2E, 415/2, 415/3A, 415//3B, 415/4, 416/2A, 418, 421/1, 421/2, 422/1A, 422/1B, 422/1C, 422/2, 423/1, 423/2, 423/3, 423/4, 423/5, 424/1, 424/2, 424/3, 424/4, 426/1B, 426/1B, 426/1C, 426/1D, 426/2, 426/3A, 426/3B, 426/3C, 427/1, 427/2, 427/5A, 97/3, 133/2E2, 132/2C, 141/2B, 141/2C, 877/2A2, 877/2B, 877/2C, 878/2, 879/2, 914, 921/1A, 921/1B, 922/2, 922/1, 923/1A, 923/2A, 923/2B, 923/2C, 924/1, 924/2, 925/1, 925/2, 926/1, 927/1A, 930, 932/1, 936/1, 938/1, 938/2, 938/3, 939/1A1, 939/1A2, 940, 941/1, 941/2, 942/1, 942/2, 943/1A, 943/1B, 848, 849, 850, 851, 885, 889/2A, 889/2B, 891/2B2, 890/2A, 890/2B, 892, 893, 894, 895, 899, 891/2B1, 891/2A2, 884/1, 775/5, 775/6, 776/1, 776/2, 776/3, 776/4A, 776/5A, 777/1, 777/2, 778/2A, 778/2B, 778/2C, 778/2DC, 778/2E2, 778/2F2, 779, 844/1, 844/2, 962, 921/2, 1011, 1012, 900/1, 901/2, 902/1, 904/1B, 900/2C, 901/1A, 900/2A, 901/1C, 900/2B, 901/1B, THEKKAMPATTY village, Mettupalayam Taluk and Coimbatore District - Renewal of Consent for the operation of the plant and discharge of sewage and/or trade effluent under Section 25 of the Water (Prevention and Control of Pollution) Act, 1974 as amended in 1988 (Central Act 6 of 1974) – Issued- Reg.

REF: 1.Proc. No.T12/TNPCB/F.0038CBN/RL/CBN/W&A/2016 DATED: 11/08/2016
2.IR.No : F.0038CBN/RL/AEE/CBN/2017 dated 10/04/2017

RENEWAL OF CONSENT is hereby granted under Section 25 of the Water (Prevention and Control of Pollution) Act, 1974 as amended in 1988 (Central Act, 6 of 1974) (hereinafter referred to as “The Act”) and the rules and orders made there under to

M/s.ITC LIMITED, PSPD UNIT KOVAI,

S.F.No. 241/1 , 409/1, 409/2A, 409/2B, 409/2C, 409/2D, 409/2E, 409/2F, 409/2G, 409/2H, 409/2I, 410/2B, 410/3A, 410/3B, 411/1B, 411/1C, 411/1D, 412/1E, 412/1F, 412/2, 412/3C, 412/3D1, 412/3D2, 412/3D3, 414/2A, 414/2C 414/2D, 414/2E, 415/2, 415/3A, 415//3B, 415/4, 416/2A, 418, 421/1, 421/2, 422/1A, 422/1B, 422/1C, 422/2, 423/1, 423/2, 423/3, 423/4, 423/5, 424/1, 424/2, 424/3, 424/4, 426/1B, 426/1B, 426/1C, 426/1D, 426/2, 426/3A, 426/3B, 426/3C, 427/1, 427/2, 427/5A, 97/3, 133/2E2, 132/2C, 141/2B, 141/2C, 877/2A2, 877/2B, 877/2C, 878/2, 879/2, 914, 921/1A, 921/1B, 922/2, 922/1, 923/1A, 923/2A, 923/2B, 923/2C, 924/1, 924/2, 925/1, 925/2, 926/1, 927/1A, 930, 932/1, 936/1, 938/1, 938/2, 938/3, 939/1A1, 939/1A2, 940, 941/1, 941/2, 942/1, 942/2, 943/1A, 943/1B, 848, 849, 850, 851, 885, 889/2A, 889/2B, 891/2B2, 890/2A, 890/2B, 892, 893, 894, 895, 899, 891/2B1, 891/2A2, 884/1, 775/5, 775/6, 776/1, 776/2, 776/3, 776/4A, 776/5A, 777/1, 777/2, 778/2A, 778/2B, 778/2C, 778/2DC, 778/2E2, 778/2F2, 779, 844/1, 844/2, 962, 921/2, 1011, 1012, 900/1, 901/2, 902/1, 904/1B, 900/2C, 901/1A, 900/2A, 901/1C, 900/2B, 901/1B,

THEKKAMPATTY village,

Mettupalayam Taluk,

Coimbatore District.

Authorising the occupier to make discharge of sewage and /or trade effluent.

This is subject to the provisions of the Act, the rules and the orders made there under and the terms and conditions incorporated in the Special and General conditions stipulated in the Consent Order issued earlier



and subject to the special conditions annexed.

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This RENEWAL OF CONSENT is valid for the period ending March 31, 2022

Member Secretary,
Tamil Nadu Pollution Control Board,
Chennai



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SPECIAL CONDITIONS

(62)

1. This renewal of consent is valid for operating the facility for the manufacture of products/byproducts (Col. 2) at the rate (Col 3) mentioned below. Any change in the product/byproduct and its quantity has to be brought to the notice of the Board and fresh consent has to be obtained.

Sl. No.	Description	Quantity	Unit
Product Details			
1.	DUPLEX BOARD, ART BOARD, CROMO BOARD	10000	Tons / month
2.	POWER	8	MWHR
By-Product Details			
1.	NOT APPLICABLE	0	NOT APPLICABLE

2. This renewal of consent is valid for operating the facility with the below mentioned outlets for the discharge of sewage/trade effluent. Any change in the outlets and the quantity has to be brought to the notice of the Board and fresh consent has to be obtained.

Outlet No.	Description of Outlet	Maximum daily discharge in KLD	Point of disposal
Effluent Type : Sewage			
1.	sewage	73.0	In the Existing ETP
Effluent Type : Trade Effluent			
1.	Trade effluent	2600.0	On Industries Own land for irrigation



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Additional Conditions:

1. The unit shall operate and maintain the Effluent Treatment Plant continuously and efficiently so as to satisfy the standards prescribed by the Board and the treated trade effluent shall be utilized for irrigation (after maximum recycling of trade effluent before treatment in the process) and shall ensure that there shall not be any seepage/overflow of treated/untreated trade effluent into nearby land/odai or any other water sources directly or indirectly.
2. The unit shall continue to dispose the plastic waste generated from the process, through Co-incineration in cement plant.
3. The unit shall continue the study regarding the continuous monitoring of the effect of the treated effluent on land for irrigation, on soil and crops/plants/trees through TNAU, Coimbatore.
4. The unit shall comply the conditions/suggestions/improvements any on the separate study being conducted by Directorate of natural Resource Management wing of Tamil Nadu Agricultural University, Coimbatore based on the complaints received against the unit from the farmers in and around the unit's irrigation lands.
5. The unit shall dispose the Hazardous waste as per the Authorization obtained under Hazardous Waste (MH&TM)Rules,2008 and shall comply with the provision of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.
6. The unit shall uniformly dispose the treated trade effluent over unit's own land in compliance to the hydraulic loading rate of 35 KL/ hectare.
7. The unit shall maintain and record steam flow meters in the power plant and paper process sections.
8. The unit shall operate and maintain the EMFMs provided at the various locations of ETP and shall maintain the log book for the same.
9. The unit shall connect the effluent monitors for pH, COD, BOD, TSS &Flow within a month and ensure that proper data shall be provided with CAC of TNPCB at all times.
10. The unit shall regularly conduct a waste audit study , performance of existing ETP with the reputed institutions as committed so as to reduce ,recycle treated waste water in the plant and furnish a detailed report with time schedule for implementation of improvements plan.
11. The unit shall regularly study the irrigation pattern, water application for irrigation, crops rotation in their agriculture filed from an reputed institutions and furnish a detailed report.
12. The unit shall operate and maintain the piezo meters provided in and around the area where treated trade effluent utilized for on land for irrigation and collect the ground water samples periodically to assess the quality of ground water.
13. The unit shall comply with the conditions/suggestions/improvements any on the separate study being conducted by Directorate of natural Resource Management wing of Tamil Nadu Agricultural University, Coimbatore based on the complaints received against the unit from the farmers in and around the unit's irrigation lands.
14. In case of revision of consent fee by the Government, the unit shall remit the difference in amount within one month from date of notification. Failing to remit the consent fee, this consent order will be withdrawn without any notice and further action will be initiated against the unit as per law.

**Member Secretary,
Tamil Nadu Pollution Control Board,
Chennai**

To

M/s.ITC LIMITED, PSPD UNIT KOVAI,
Thekkampatty Village, Vivekanandapuram.P.O., Mettupalayam Taluk, Coimbatore District,
Pin: 641113

Copy to:

- 1.The Commissioner, KARAMADAI-Panchayat Union, Mettupalayam Taluk, Coimbatore District .
2. The District Environmental Engineer, Tamil Nadu Pollution Control Board, COIMBATORE NORTH.
3. The JCEE-Monitoring, Tamil Nadu Pollution Control Board, Coimbatore.
4. File

** This consent order is computer generated by OCMMS of TNPCB and no signature is needed**



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TNAU - ITC Ltd., (PSPD) COLLABORATIVE RESEARCH PROJECT**HALF YEARLY PROGRESS REPORT
(APRIL, 2019 - SEPTEMBER, 2019)****“STUDIES ON THE IMPACT OF CONTINUOUS APPLICATION OF ITC Ltd., PSPD
(UNIT – KOVAI) PAPER BOARD MILL TREATED EFFLUENT ON IRRIGATION”****TEAM**

**Dr. M. MAHESWARI
Dr. G. BALASUBRAMANIAN
M. PRIYADHARSHINI
M. ANUSHYA**

SCHEME SPONSORED BY

**ITC Ltd., PSPD, UNIT - KOVAI,
THEKKAMPATTY VILLAGE, COIMBATORE – 641 113**

**DEPARTMENT OF ENVIRONMENTAL SCIENCES
TAMIL NADU AGRICULTURAL UNIVERSITY
COIMBATORE – 641 003**



CONFIDENTIAL

TNAU - ITC Ltd., (PSPD) COLLABORATIVE RESEARCH PROJECT
HALF YEARLY PROGRESS REPORT
(APRIL, 2019 - SEPTEMBER, 2019)

“STUDIES ON THE IMPACT OF CONTINUOUS APPLICATION OF ITC Ltd., PSPD
(UNIT – KOVAI) PAPER BOARD MILL TREATED EFFLUENT ON IRRIGATION”



TEAM

Dr. M. MAHESWARI
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SCHEME SPONSORED BY
ITC Ltd., PSPD, UNIT - KOVAI, THEKKAMPATTY VILLAGE,
COIMBATORE – 641 113.

DEPARTMENT OF ENVIRONMENTAL SCIENCES
TAMIL NADU AGRICULTURAL UNIVERSITY
COIMBATORE – 641 003



2019

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PROGRESS REPORT (APRIL, 2019 - SEPTEMBER, 2019)

- 1. Project Title "Studies on the impact of continuous application of ITC Ltd., PSPD (Unit - Kovai) paper board mill treated effluent on irrigation"
- Name of the Project Leader(s) **PI: Dr. M. Maheswari**
Professor and Head(i/c),
Dept. of Environmental Sciences,
TNAU, Coimbatore – 641 003.
- 2. and Designation **Co-PI: Dr. G. Balasubramanian,**
Professor.
Dept. of Environmental Sciences,
TNAU, Coimbatore – 641 003.
- 3. Project duration 3 Years (April, 2017 – March, 2020)
- 4. Objectives

- 1. Monitoring the quality of raw and treated effluent from Effluent Treatment Plant (ETP) of ITC Paper Board mill, Thekkampatty
- 2. Continuous monitoring of soil and ground water qualities in and around the premises of ITC factory (Bench Mark sites)
- 3. Piezometers and lysimeter studies in the areas irrigated with ITC paper board treated effluent
- 4. Evaluating different methods of irrigation, by using treated effluent for different crops
- 5. ETP Sludge management

Activity I: Characterization of ITC Ltd., (PSPD), effluent for physico-chemical properties at periodical intervals

The raw and treated effluent samples were collected once in three months period upto 2020 from ITC Ltd., PSPD and they were analyzed for its physical and chemical properties. First quarter samples were collected in April, 2019 and second quarter sampling was done in July, 2019. Samples collected were analyzed as per the standard analytical methods and the results are presented in Table 1.



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Table 1. Characteristics of ITC raw and treated effluent

Parameters	Unit	Values			
		Raw Effluent		Treated Effluent	
		April, 2019	July, 2019	April, 2019	July, 2019
pH	-	7.62	7.28	7.82	7.91
EC	dS m ⁻¹	2.46	2.14	1.82	1.88
TDS	mg L ⁻¹	1532	1389	1165	1203
TSS	mg L ⁻¹	1587	1624	98	96
DO	mg L ⁻¹	3.4	3.5	5.6	4.8
BOD	mg L ⁻¹	158	164	28	30
COD	mg L ⁻¹	474	546	140	164
Nitrogen	mg L ⁻¹	26	26	26	27
Phosphorus	mg L ⁻¹	3.5	3.4	3.6	3.5
Potassium	mg L ⁻¹	31.0	33.4	28.0	20.8
Calcium	mg L ⁻¹	202	209	242	221
Magnesium	mg L ⁻¹	52	55	64	68
Sodium	mg L ⁻¹	208	209	176	175
Carbonate	mg L ⁻¹	-	-	-	-
Bicarbonate	mg L ⁻¹	234	220	134	125
Chloride	mg L ⁻¹	280	282	378	353
Sulphate	mg L ⁻¹	178	184	163	172

Characteristics of the raw and treated effluent

The analyses of the effluent samples collected during the first quarter from April to June, 2019 (Table 1) showed that the raw effluent had a neutral pH of 7.62 with an electrical conductivity of 2.46 dS m⁻¹. The total dissolved solids content was observed to be 1532 mg L⁻¹ in the raw effluent. The cations such as calcium, magnesium, sodium and potassium in the raw effluent were 202, 52, 208 and 31 mg L⁻¹ respectively. The bicarbonate content of raw effluent was 234



Characteristics of Ground Water:

The characteristics of the ground water and borewell water samples collected from the benchmark sites have been tabulated in the Tables 3 and 4 (for April to June) and 5 and 6 (for July to September). The pH of the water samples ranged from 7.12 to 8.43 during April to June, 2019 whereas pH was ranged from 7.28 to 8.20 during September 2019. The EC of the samples ranged from 0.68 to 1.54 dSm⁻¹ and 0.20 to 2.19 during April, 2019 and September, 2019, and the mean EC value of the samples was 1.13 dSm⁻¹ and 1.24 dSm⁻¹ for April and September, 2019; respectively.

The cations such as calcium, magnesium, sodium and potassium in the ground water varied from 61.00 to 172.00, 22.30 to 77.80, 46.23 to 445.14 and 3.14 to 8.12 mg L⁻¹ in case of ground water samples collected during the first quarter of April to June, 2019 along with a pronounced coefficient of variability of 23.62, 34.11, 69.69 and 25.16 per cent, respectively. On the other hand, for the next quarter from July to September, 2019, the cations such as calcium, magnesium, sodium and potassium in the ground water varied from 64.00 to 296.00, 16.80 to 153.70, 52.10 to 445.10 and 3.00 to 23.40 mg L⁻¹ with a coefficient of variability of 46.6, 68.6, 71.2 and 73.8 per cent, respectively.

Apart from the benchmark sites, water samples were also collected from borewells and piezometers during April, 2019. There was no sufficient water in piezometers for sample collection at different sites in and around the factory premises due to continuous dry spell. Water samples were not collected from the borewells. Based on the results of April to June, 2019 and July to September 2019, chance for alkalinity hazard (SAR<10) is less and thus will not affect the permeability of the soil. All the water samples were found to have low Soluble Sodium Percentage (<60%) which makes them as good source of irrigation water. The samples during both sampling had a RSC of less than 1.25, which emphasize that the water from these locations are suitable for irrigation. Variations in ground water EC may be caused by the monsoon failure and drought conditions prevailed in this region due to the lack of water.

Characteristics of Soil

The characteristics of the soil samples collected from the benchmark sites have been tabulated in the Tables 7 to 10. The pH of the soil samples of April to June, 2019 ranged between



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6.92 and 8.31 and the mean pH value of the soil was 7.81 whereas the pH was found to be ranging from 7.11 to 7.98 for the samples collected during July to September, 2019 with a mean pH of 7.60. For the samples collected during April to June, 2019; EC of the soil samples ranged from 0.08 and 0.74 dSm⁻¹ and EC mean value for the soil samples was 0.29 dSm⁻¹. The EC of the July to September, 2019 samples ranged from 0.15 to 1.45 dSm⁻¹ and EC mean value for the soil samples was 0.50 dSm⁻¹. The organic content of the soil ranged from low to medium status. Most of the soil samples collected from April to June and July to September, 2019 have very low organic carbon content (<0.5) with a coefficient of variation of 44.15 per cent in first quarter and 45.39 per cent in second quarter. The available nitrogen content during both the quarters of the sampling were found to be very low (<280 kg ha⁻¹) with a CV of 47.99 per cent in first quarter and 31 per cent in the subsequent quarter. The potassium status of the soil found to be high (>280 kg ha⁻¹) ranging from 21.00 to 195.50 kg ha⁻¹ for the samples of April to June, 2019 whereas the samples collected during July to September, 2019 ranged from 79.50 to 301.30 kg ha⁻¹ with a coefficient of variation of 73.26 and 39.49 per cent, respectively.

Field Experiment - IV

In order to evaluate the different methods of irrigation (drip and flood irrigation) using treated effluent and borewell water on crop production and soil fertility, a field experiment was initiated with grafted brinjal as test crop. The details of the experiment are given below.

EXPERIMENTAL DETAILS

- 1 Crop : Grafted brinjal (*Solanum melongena*)
- 2 Spacing : 1.5×1.5 m
- 3 Date of transplanting : 09.10.2019
- 4 Design : Split plot design
- 5 Factors : 3
- 6 Treatments : 8
- 7 Replications : 4
- 8 No. of plots : 32
- 9 Area : 0.4 acres

SL



CONCLUSION:

The treated ITC paperboard effluent and the ground water and soil samples were collected from the benchmark sites in and around the premises of ITC factory during April-September, 2019 and analyzed.

From the analysis, it is concluded that,

- The treated ITC paperboard effluent can be used for irrigation since the vital quality parameters viz., pH, EC, BOD, TDS are within the limits as prescribed by the Tamil Nadu State Pollution Control Board.
- All the groundwater quality parameters are within the permissible limits. The average SAR value found to be less than 4. It indicates that the ground water quality was not deteriorated due to use of treated effluent irrigation.
- In soil samples analyses, it is revealed that the soil quality was not deteriorated due to continuous treated effluent irrigation.
- On farm trial with grafted brinjal has been initiated to evaluate the different methods of irrigation (drip and flood irrigation) using treated effluent and well water on crop production and soil fertility.

However, continuous monitoring is essential to assess the long term effect of recycling paper board mill treated effluent irrigation.

[Signature]
 Co-Principal Investigator
 &
 Professor (ENS)

Dr. G. BALASUBRAMANIAN, Ph.D.
 Professor (ENS)
 Department of Environmental Sciences,
 Tamil Nadu Agricultural University
 Coimbatore - 641 003.



[Signature]
 Principal Investigator
 &
 Professor and Head
 Dept. of ENS

Professor and Head
 Dept. of Environmental Science
 Tamil Nadu Agricultural University
 Coimbatore - 641 003.

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S No	Direction of TNPCB dated 17/03/2020	Action Planned	Status as on 08/12/2020
	<u>Major Violations considered for levying Compensation</u>	<u>Actions Planned</u>	<u>Status</u>
1	Non-installation of Online Continuous Emission Monitoring System (OCEMS) for 44 TPH standby Boiler.	Unit has engaged M/s Emerging Technology, Chennai to supply and install OCEMS to standby 44 TPH boiler and the same is completed and data transmission established with TNPCB & CPCB.	Completed.
2	Dumping of plastic waste inside the unit premises	During the earlier years some plastic that was left out on the ground got mixed with soil and vegetation has grown fully over that area. These materials are not plastic stored by ITC. We shall endeavour to clean this area to the extent possible.	Out of 143 acres of factory land, 66 acres is used for plant and machine buildings and balance 77 acres is green cover.
3	Exceedance of source emissions parameters (NO ₂ & SO ₂).	ITC taken trials with imported coal by reducing equivalent quantity of lignite to meet the SO ₂ emission norms. NO ₂ emissions are in compliance with SC order.	Completed
4	Traces of heavy metals in soil due to past discharge of partial/untreated effluent.	Tamil Nadu Agricultural University (TNAU) is engaged by ITC to monitor the impact of application of treated effluent on soil and ground water quality since year 2000 onwards. TNAU submits reports annually which shows no adverse impact on the soil and ground water quality. The standards for monitoring for heavy metals were not prescribed by TNAU in the course of soil monitoring over the years. However, committee report indicates traces of heavy metals which is lesser than compost standards for irrigation purpose which indicates no damage to soil.	Completed
1	The industry shall ensure no discharge of partially/untreated effluent in to the soil.	Unit does not have provision to discharge partial/untreated effluent for irrigation. Unit has Effluent Treatment Plant (ETP) of adequate capacity to treat the effluent. Unit analyses the samples at inlet and outlet of ETP on daily basis. TNPCB officials collect the samples on monthly basis and share the reports. ETP has online continuous monitoring system and data is transmitted on a continuous basis. All of the above indicates full compliance with the norms.	Completed
	The industry shall provide flow meter at inlet of ETP in order to quantify total effluent generation and treated and its shall be connected to the online servers of CPCB and TNPCB.	Flowmeter is installed at ETP inlet and connected to ETP online instrument. Unit has engaged M/s Ideatech for installation and data transmission. Data is being transmitted to TNPCB & CPCB.	Completed



For ITC Limited, PSPD, Unit: Koval

S. VENKATA RAO
UNIT HEAD

3	The industry shall provide calibration facility in the OCEMS installed in 60 TPH boiler for the parameters PM, NO ₂ & SO ₂ . Data from NO ₂ & SO ₂ analysers to be connected to CPCB and TNPCB server.	Unit has engaged M/s Environment SA India Pvt Limited to provide calibration software to online NO ₂ & SO ₂ analyser of 60 TPH boiler and it is connected to CPCB and TNPCB server.	Completed
4	The OCEMS attached in the 60 TPH Boiler shall be placed in appropriate location as per emission regulations part-III	Unit has engaged M/s Cholamandalam MS Risk Services Ltd for advisory consultancy for relocation of OCEMS of 60TPH boiler to meet the directions. Instrument is relocated from Boiler ducting to Chimney and connected to TNPCB and CPCB.	Completed
5	The industry shall install OCEMS in 44 TPH boiler for the parameters PM, SO ₂ & NO ₂ with gaseous calibration facility and connected to CPCB & TNPCB server	Addressed under Point (1) of major violations.	Completed
6	The industry shall provide proper processing and storage facilities for vermicomposting of bio sludge	Unit constructed additional concrete platforms in the composting yard and work completed.	Completed
7	The industry shall provide proper processing and storage facilities for the boiler fuel (Lignite & biomass) and avoid open storage. This facility shall be provided with proper drainage system.	Extension of lignite shed with additional investment of Rs.70 Lac is under progress to avoid open storage of the fuel. We are planning to complete the work by 31/03/2021.	Under Progress
8	The industry shall provide adequate control measures and maintain regularly to avoid fugitive emission from storage yard of boiler fuel and bottom ash.	Extension of the fuel shed is under construction as mentioned above. Unit has provided water sprinklers in fuel, biomass and fly ash area.	Completed
9	The industry shall remove the open dumping of plastic waste and process waste sludge (Binding chemicals) found during committee visit and dispose it properly. The industry shall ensure no open dumping of waste at any time.	Plastic waste and process waste sludge were removed from solar plant area and they were disposed to cement plants for co-processing.	Completed
10	The industry shall provide garland drain system around the premises and connected to concerted rain water harvesting pond to avoid seepage or can adopt any appropriate methods to avoid seepage or can adopt any appropriate methods to avoid seepage water flowing to agriculture land.	Unit has designed the scheme for collection of roof water from waste paper yard and fuel yard to divert rain water to storage pond with investment of Rs.53 Lac to avoid water going to agricultural land. We are planning to complete the same by 31/03/2021. Unit has created rain water storage pits to collect the rain water run-off to avoid going to nearby fields.	Under Progress



For ITC Limited, PSPD, Unit: Kovai


S. VENKATA RAO
UNIT HEAD

S No	PCB Pts letter dated Aug'2020	ITC Kovai Response	Status on 08/12/2020
1	The Unit shall submit separate applications and obtain consents for Paper production (Duplex, Board, Art Board, Cromo Board) and Power plant generation (8MWhr)	Unit is having the consent till March 31 st 2022. Unit will apply for renewal prior to expiry of the consent. We are not sure that if applying for more than one Consent in respect of a factory is permitted. Please clarify.	Closed
2	The Industry shall provide calibration facility in the OCEMS installed in 60 TPH boiler for the parameters PM, SO ₂ and NO ₂ . SO ₂ and NO ₂ analyser and same be connected to CPCB and TNPCB server	Calibration facility for the OCEMS is provided for 60 TPH boiler. PM, SO ₂ and NO ₂ analyzer readings from 60 TPH boiler is transmitted to TNPCB & CPCB.	Completed
3	The Industry shall provide OCEMS installed in 44 TPH boiler for the parameters PM, SO ₂ and NO ₂ . SO ₂ and NO ₂ and same be connected to CPCB and TNPCB server by 30.09.2020	Unit has commissioned PM, SO ₂ & NO ₂ analyzers in 44 TPH Boiler data is transmitted to TNPCB & CPCB.	Completed
4	The unit shall furnish the records of 44 TPH boiler operation as claimed by the unit.	44 TPH boiler was operated only when 60 TPH boiler is stopped for maintenance (or) for inspection. The details of stoppages of 60 TPH boiler is provided to TNPCB Chennai and Coimbatore.	Completed
5	The Industry shall quantify the plastic waste and process waste sludge (binding chemicals) which are dumped and furnish the details along with disposal details	The plastic and other waste generated in the Mill are disposed to TNPCB registered recyclers. Some plastic waste is found combined with soil hence it is practically not possible to quantify. Small quantity of waste sludge observed during site visit is disposed to cement plants.	Completed
6	The Unit shall utilize imported coal having 0.5 % Sulphur instead of lignite obtained from NLC having 1.5 % Sulphur	Unit adopted the fuel mix with imported coal along with lignite and biofuels to reduce SO ₂ emissions.	Completed
7	The unit shall analyse the heavy metals in the raw material and also furnish report to board, since Ni was found to be present in the ground water sample report	Unit has submitted the samples for analysis to TNAU. The reports are attached as Annexure (A).	Completed
8	The Unit shall provide X-Ray type scan to screen the barrels/container with paper raw materials at the port, so as to reduce time of inspection for TNPCB officials.	Inspection of Raw Materials is carried out at the Port in line with the directions of High Court. Presently, based on interaction with other Paper Mills in Tamil Nadu we could not find any reference of usage. However, Unit will continue to explore availability of such gadget to reduce inspection time.	Closed
9	The Unit shall form 30 x 30 m grid and install piezo metric borewell for analysis of ground water	Unit already has 10 piezometers in the land under irrigation by treated effluent and TNAU is monitoring and reporting to monitor soil and ground water. In addition to above, Unit provided 19 piezo wells in the irrigation land for further monitoring.	Completed
10	The Unit shall provide sprinkler arrangement to avoid fugitive emission	Unit provided sprinklers arrangement at approach roads from fuel storage to fuel handling plant to reduce fugitive emission in fuel handling.	Completed



For ITC Limited, PSPD, Unit: Kovai

S. VENKATA RAO
UNIT HEAD

11	The Unit shall check proximity and Ultimate analysis to find the heavy metals in the lignite.	Unit has submitted the samples for analysis to TNAU. The reports are attached as Annexure (A).	Completed
12	The Unit shall furnish the list of proprietary chemicals used in the industry	Submitted the list of chemicals along with Data sheets to TNPCB.	Completed



For ITC Limited, RSPD, Unit: Kovai

S. VENKATA RAO
UNIT HEAD



TAMIL NADU AGRICULTURAL UNIVERSITY
DEPARTMENT OF ENVIRONMENTAL SCIENCES, COIMBATORE
ANALYTICAL AND ADVISORY UNIT

ANALYTICAL REPORT

Nature of sample : Solid Sample (Box Board Cuttings)
Received from : ITC Limited, Paper and Boards & Speciality Papers Division,
Vivekanandapuram (post), Thekkampathy, Coimbatore-641 113.
Parameters analyzed : As below

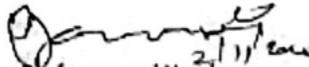
Result

Parameters	Values
Total Chromium (mg/kg)	0.03
Total Lead (mg/kg)	0.002
Total Nickel (mg/kg)	BDL
Total Cadmium (mg/kg)	BDL

BDL - Below Detectable Limit

Note : The above results are communicated with the following conditions.

- The results indicate only the actual content of parameters requested by the stakeholders for the samples provided by them.
- In no way, this can be claimed as a complete composition / makeup of the sample
- This communication cannot be treated / recommended as a certificate
- Its use for publicity, arbitration or as evidence in legal disputes is strictly forbidden.


2/11/2010
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For ITC Limited, PSPD, Unit: Koval


S. VENKATA RAO
UNIT HEAD



TAMIL NADU AGRICULTURAL UNIVERSITY
DEPARTMENT OF ENVIRONMENTAL SCIENCES, COIMBATORE
ANALYTICAL AND ADVISORY UNIT

ANALYTICAL REPORT

Nature of sample : Solid Sample (Mixed Waste Paper)
Received from : ITC Limited, Paper and Boards & Speciality Papers Division,
Vivekanandapuram (post), Thekkampathy, Coimbatore-641 113.
Parameters analyzed : As below

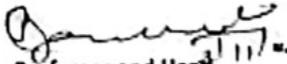
Result

Parameters	Values
Total Chromium (mg/kg)	0.75
Total Lead (mg/kg)	0.01
Total Nickel (mg/kg)	0.001
Total Cadmium (mg/kg)	BDL

BDL –Below Detectable Limit

Note : The above results are communicated with the following conditions.

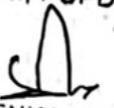
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For ITC Limited, PSPD, Unit: Koval


S. VENKATA RAO
UNIT HEAD



TAMIL NADU AGRICULTURAL UNIVERSITY
DEPARTMENT OF ENVIRONMENTAL SCIENCES, COIMBATORE
ANALYTICAL AND ADVISORY UNIT

ANALYTICAL REPORT

Nature of sample : Solid Sample (ONP Vernacular)
Received from : ITC Limited, Paper and Boards & Speciality Papers Division,
Vivekanandapuram (post), Thekkampathy, Coimbatore-641 113.
Parameters analyzed : As below

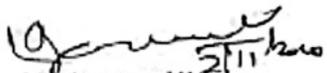
Result

Parameters	Values
Total Chromium (mg/kg)	0.50
Total Lead (mg/kg)	BDL
Total Nickel (mg/kg)	0.01
Total Cadmium (mg/kg)	BDL

BDL –Below Detectable Limit

Note : The above results are communicated with the following conditions.

- The results indicate only the actual content of parameters requested by the stakeholders for the samples provided by them.
- In no way, this can be claimed as a complete composition / makeup of the sample
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For ITC Limited, PSPD, Unit: Koval


S. VENKATA RAO
UNIT HEAD



TAMIL NADU AGRICULTURAL UNIVERSITY
DEPARTMENT OF ENVIRONMENTAL SCIENCES, COIMBATORE
ANALYTICAL AND ADVISORY UNIT

ANALYTICAL REPORT

Nature of sample : Solid Sample (Sorted White Ledger)
Received from : ITC Limited, Paper and Boards & Speciality Papers Division,
Vivekanandapuram (post), Thekkampathy, Coimbatore-641 113.
Parameters analyzed : As below

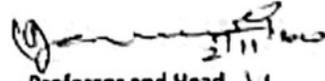
Result

Parameters	Values
Total Chromium (mg/kg)	0.92
Total Lead (mg/kg)	0.005
Total Nickel (mg/kg)	0.001
Total Cadmium (mg/kg)	BDL

BDL –Below Detectable Limit

Note : The above results are communicated with the following conditions.

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- In no way, this can be claimed as a complete composition / makeup of the sample
- This communication cannot be treated / recommended as a certificate
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For ITC Limited, PSPD, Unit: Kovai


S. VENKATA RAO
UNIT HEAD



TAMIL NADU AGRICULTURAL UNIVERSITY
DEPARTMENT OF ENVIRONMENTAL SCIENCES, COIMBATORE
ANALYTICAL AND ADVISORY UNIT

ANALYTICAL REPORT

Nature of sample : Lignite Sample
Received from : ITC Limited, Paper and Boards & Speciality Papers Division,
Vivekanandapuram (post), Thekkampathy, Coimbatore-641 113.
Parameters analyzed : As below

Result

Parameters	Values
Total Chromium (mg/kg)	0.23
Total Lead (mg/kg)	0.001
Total Nickel (mg/kg)	BDL
Total Cadmium (mg/kg)	BDL

BDL—Below Detectable Limit

Note : The above results are communicated with the following conditions.

- The results indicate only the actual content of parameters requested by the stakeholders for the samples provided by them.
- In no way, this can be claimed as a complete composition / makeup of the sample
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 21/11/2016

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