

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

Original Application No. 33 of 2023 (SZ)

Nukatati Rajasekhar & another

.... Applicants

-Vs-

Union of India,
Through its Secretary,
Ministry of Environment Forest and CC
& 6 others

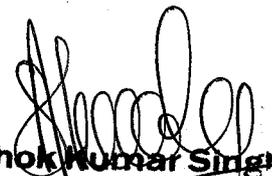
... Respondents

**7TH RESPONDENT'S REPLY TO CPCB'S FINAL REPORT DATED
10.08.2023**

1. The 7th Respondent herein humbly submits that they have studied the final report filed by the 3rd Respondent CPCB in the above referred matter. It can be seen that the report of the CPCB has reinforced the fact that the 7th Respondent has been complying with the conditions stipulated under the EC and Consents issued by the Authorities. The CPCB, in its final report, has mentioned that it has observed a few minor deviations in the readings recorded during their inspection. This Respondent is therefore bound to mete out the issues mentioned in CPCB's report. This Respondent is hereby submitting its replies only to the deviations so mentioned in the CPCB's report as follows:

CPCB Report Page No & S. No	CPCB's Observation / Recommendation	7th Respondent M/s. Andhra Paper Limited response /Actions Plans
Page No: 22 S. No : 18 Point No : i	To renew the lease agreement for discharge of treated effluent to lagoons at Turupulanka.	Under Progress with District Administration & is being perused constantly. Present status: 1) Lease was for the period 1999-2009. Further extension of 33 years recommended on 14.08.2014: The Chief Commissioner of Land Administration & Special Chief Secretary to Govt. Of A. P




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 & Mill Manager

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recommended Turupulanka Island lease renewal from 1999 to till 2009 and for a further period of 33 years and forwarded recommendation to Government of Andhra Pradesh on 14.08.2014 for further action **(ANNEXURE - 1)**.

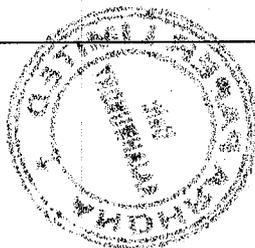
2) Commissioner of Industries, Government of A. P recommended the lease proposal to Principal Secretary of Industries and commerce, Government of A.P vide Lr. No :29/1/2014/14744, dated 29/11/2014 subject to 10 % of present market value as lease amount with provision for enhancement of lease amount in a block period of 5 years **(ANNEXURE - 2)**.

3) District Collector, East Godavari communicated vide ref. E1/495/2016, dated 04.2016, stating that matter is referred to Sub - Collector, Rajamahendravaram and also constituted a committee with the members of A.D Agriculture, A.D Horticulture, District Registrar and Tahsildar to examine the lease proposal and also for fixation of lease rent **(ANNEXURE - 3)**.

4) Committee headed by Sub-Collector inspected Turupulanka on 28.09.2016. Currently the matter is under process with District Administration.

5) 20.03.2023: Turupulanka land survey conducted by Office of Tahsildar - Rajamahendravarm Urban on 20.03.2023 and report submitted to District Collector **(ANNEXURE - 4)**.

6) Recent submission to District Collector vide letter dated 29.07.2023 is filed herewith as



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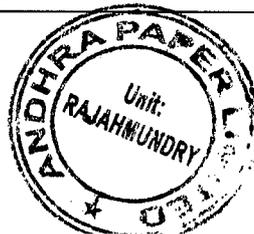
		<p>ANNEXURE - 5 wherein this Respondent cited all the above facts and requested for the renewal of the lease.</p> <p>This Respondent is diligently following up with the District Administration.</p>
<p>Page No: 22 S. No : 18 Point No : ii</p>	<p>To augment air pollution control devices at recovery boiler and coal fired boiler to control particulate matter emissions.</p>	<p>1) Recovery Boiler Source emissions from the stacks are controlled by Electrostatic Precipitators (ESP). There are 3 ESPs with 11 electric fields.</p> <p>2) Coal fired boiler Source emissions from the stacks are controlled by Electrostatic Precipitators (ESP). There is 1 ESP with a total of 3 electric fields.</p> <p>3) NABL accredited 3rd party has been testing once in a month and the PM values are within the norms. The 3rd party test reports of last six months are filed herewith as ANNEXURE - 6.</p> <p>4) The PM values of samples collected by APPCB on 02.05.2023 is within the norms. Recovery Boiler PM value is 40.4 mg/ Nm³ against the norm of 50 mg/Nm³. Coal fired boiler PM value is 38.7 mg/ Nm³ against the norm of 50 mg/Nm³ The APPCB reports of the collected samples are filed herewith as ANNEXURE - 7.</p> <p>5) However, under preventive maintenance and sustainability program, this Respondent has proposed replacement of the Recovery Boiler ESP No.3 - fields 1 to 4, with an estimated budget of Rs.13.00 Crores. Purchase order issued to M/s. KC Cottrell Engineering services, Chennai vide order no : 13792446, dt. 14.08.2023. The entire replacement</p>



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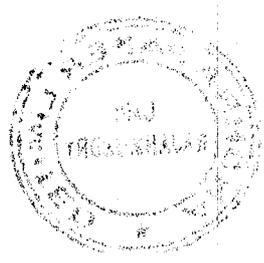
		work is expected to be completed by March 31, 2024.
Page No: 22 S. No : 18 Point No : iii	To implement measures to control Hydrogen Sulphide emissions at Rotary Lime Kilns -1 and Rotary Lime Kilns -2 and comply with the source emission standards.	<p>1) The rotary lime kiln temperature are always maintained higher than 1050 deg.c for 100 % calcination of Ca Co₃ to CaO, which is the output product to use in further processes.</p> <p>2) The Non Condensable Gases (NCG), which contain sulphur compounds are incinerated in rotary lime-kilns across all pulp and paper industries and the same is a proven technology for treatment of these NCG gases.</p> <p>3) The temperature profile recorded during sampling by CPCB on 15.05.2023 is attached as ANNEXURE - 8. The temperature of KILN-1 is > 1290 deg.c & KILN-2 is > 1440 deg.c.</p> <p>4) The higher Kiln temperature indicates that H₂S presence in the NCG gases is completely decomposed. Hence, there is no chance of such high values reporting in stacks flue gases.</p> <p>5) The H₂S values of samples collected by APPCB on 02.05.2023 are within the norms.</p> <p>Rotary Lime Kiln - 1 H₂S value is 7.0 mg/ Nm³ against the norm of 10 mg/Nm³.</p> <p>Rotary Lime Kiln - 2 H₂S value is 6.8 mg/ Nm³ against the norm of 10 mg/Nm³.</p> <p>The APPCB reports recording these values is filed as ANNEXURE - 9.</p> <p>6) The H₂S values of samples collected by NABL accredited 3rd party M/S. Glens Innovation Lab Pvt. Ltd on 07.07.2023 is within</p>



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		<p>the norms.</p> <p>Rotary Lime Kiln - 1 H2S value is 9.1 mg/ Nm3 against the norm of 10 mg/Nm3.</p> <p>Rotary Lime Kiln - 2 H2S value is 8.5 mg/ Nm3 against the norm of 10 mg/Nm3.</p> <p>The reports of 3rd party Glen Labs recording these values are filed as ANNEXURE - 10.</p> <p>7) NABL accredited 3rd party is testing the samples once in a month and the H2S values are within the norms. The 3rd party test reports of last six months are filed herewith as ANNEXURE - 11.</p>
<p>Page No : 22 S. No : 18 Point No : iv</p>	<p>To calibrate and operate the OCEMS installed for monitoring particulate matter emissions, properly and record the actual concentrations.</p>	<p>This Respondent has proposed to recalibrate the OCEMS by taking the services of a reputed 3rd party. This respondent has initiated the process of identifying an expert service provider for this purpose.</p>
<p>Page No : 22 S. No : 18 Point No : v</p>	<p>To reduce the temperature of the effluent to less than 35°C prior to microbial treatment</p>	<p>Refurbishment of Cooling Tower undertaken on 29.07.2019 and submitted report to APPCB. (ANNEXURE - 12).</p> <p>Further, in order to achieve 35 deg.c as per APPCB direction, the below action has been initiated :</p> <p>100 % renovation of Cooling Tower undertaken with at a cost of Rs.73.714 Lacs to reduce effluent temperatures before going to microbial aeration treatment.</p> <ul style="list-style-type: none"> • Increase Fan capacity from 50 HP to 100 HP • Fan wings increased from 4 no's to 8 no's. • Increased heat transfer surface

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अशोक कुमार सिंह
(अधीनस्थ) प्रबन्धक
राजमण्डल इकाई



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		<p>area</p> <ul style="list-style-type: none"> • Replacement of drip eliminators. • Modification distribution arrangement of effluent from spray nozzles. • Strengthening of total civil structure. <p>Civil mechanical works have been completed and was commissioned in the 3rd week of August, 2023.</p> <p>The photographs of the renovated cooling tower and other equipment are filed herein as ANNEXURE - 13.</p>												
Page No: 12 S. No : 18 Point No : vi	To develop greenbelt in 33% of the total land area of the Industry to mitigate effects of fugitive emissions.	<p>During this rainy season from June to Aug.23, approximately 600 saplings have been planted in 1.00 Acre across the premises.</p> <table border="1"> <tr> <td>1</td> <td>Total Land area</td> <td>198.09</td> </tr> <tr> <td>2</td> <td>Buildings, roads & walkways</td> <td>40.29</td> </tr> <tr> <td>3</td> <td>Wood storage, truck parking and open area</td> <td>91.8</td> </tr> <tr> <td>4</td> <td>Green Belt</td> <td>66</td> </tr> </table> <p>Now the present green belt is 33.3 %. The photographs of the Plantations are attached as ANNEXURE - 14.</p>	1	Total Land area	198.09	2	Buildings, roads & walkways	40.29	3	Wood storage, truck parking and open area	91.8	4	Green Belt	66
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Page No : 12 S. No : 18 Point No : vii	To install two Continuous Ambient Air Quality Monitoring Stations in addition to the existing two CAAQM Stations and ensure operation of all the four CAAQM Stations.	<p>1) Continuous Ambient air quality monitoring stations (CAAQMS) of 2 nos. installed at the periphery of the 7th Respondent premises, i.e., Near the ETP (South-west) and at the Godavari House terrace (South-east) of the mill boundaries have been established and connected to PCB site to monitor PM10, PM 2.5, SO2 & NOx.</p> <p>2) However, due to reliability issues of one of the AAQMS at Godavari House was replaced with new analysers and commissioned with</p>												



an estimated **capital cost of Rs.35.0 Lacs.** The data uploading to APPCB website was started on 23.08.2023 and is under fine-tuning. The screenshots of the Data uploading are filed herewith as **ANNEXURE-15** and the photographs thereof are filed herewith, as **ANNEXURE - 16**

3) In other two locations including existing two areas, at a total of 4 Locations, physical sampling for Ambient Air Quality monitoring is being done by MOEFCC & NABL accredited 3rd party laboratory and the reports are being submitted to APPCB & MOEFCC. These reports are filed for the ready reference of this Hon'ble Tribunal as **ANNEXURE -17.**

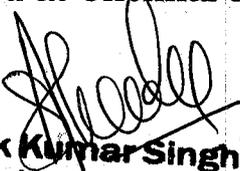
4) As recommended by CPCB and as per compliance of EC conditions, the 7th Respondent undertakes to install additional 2 nos. of AAQMs by the end of December 2023. This Respondent has already obtained Technical and commercial offers for this purpose.

2. As can be seen from the above Table, the issues mentioned by the CPCB are being addressed and measures have already been initiated by the 7th Respondent to comply with the Directions of the CPCB within an earliest possible timeframe stated above. This Respondent is therefore constantly committed and working towards compliance of all recommendations of the statutory authorities to ensure that no pollution is caused to the environment and an environmentally sustainable process is adopted by the 7th Respondent at all times.
3. This Respondent humbly prays that this Hon'ble Tribunal may be pleased to take this responses to the CPCB's final report in file and render justice.




Ashok Kumar Singh
Vice President (Operations)
& Mill Manager

Dated at Chennai on this the 8th day of September, 2023.


Ashok Kumar Singh
Vice President (Operations)
& Mill Manager
7th Respondent


Counsel for the 7th Respondent



Verification

I, **Ashok Kumar Singh, the Vice President (Operations) & Mill Manager and Authorised Signatory of the 7th Respondent** herein, now come over to Chennai do hereby verify that the statements made in para 1 to 3 and the table above have been explained to me and are affirmed to be true to the best of my knowledge, belief and information.


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