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

REPLY STATEMENT FILED BY THE 7th RESPONDENT

The 7th Respondent herein humbly submits as follows:

1. The address for service of all the notices and processes on the 5th Respondent is that of their counsel, S.Siva Sankar, N.Jayakumar, N.M.Keerthana, S.Deepa & Sakthi Vinayagam, Advocates, having office at Office No.31, Luz Golden Enclave, 180, Luz Church Road, Mylapore, Chennai – 600004.

2. At the outset, the 7th Respondent submits that the above Application and the allegations contained therein are baseless, misleading, devoid of any merit and is liable to be dismissed. The present Application has been filed by the Applicants with the sole intention to harass and settle scores with the 7th Respondent, after having failed in their several attempts to restrain the lawful activities of the 7th Respondent. Before proceeding to mete out the allegations made in the Application, it is necessary to set out the factual background of the capabilities and the processes implemented by the 7th Respondent for a wholesome appreciation of the issue before this Hon'ble Tribunal.

Factual background

3. The 7th Respondent, formerly International Paper APPM Limited, has a rich history of over 100 years when it was established as Carnatic Paper Mills limited in the year 1921. Over the years, the management of the Company changed hands and is presently known as Andhra Paper Limited. They are one of the largest paper and pulp manufacturers in India producing writing, printing and copier papers

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for foreign and domestic markets. Their production facilities at Rajahmundry and Kadiyam in East Godavari District, Andhra Pradesh, have a total production capacity of 240,000 Tonnes Per Annum (TPA). The company employs Direct and indirect work force of around 5300 persons overall for both the locations. Located at Rajahmahendravaram, East Godavari District, the 7th Respondent holds ISO 14001, ISO 9001 & ISO 45001 certifications as well as the Forest Stewardship Council (FSC) Chain of Custody (COC) Certification which indicates that the wood as a raw material for paper production has been sourced from sustainably managed forests.

Implementing Pioneering State-of-art technologies

4. The 7th Respondent is a pioneer in the industry adopting state-of-the-art technologies achieving a sustainable production process as well as a sustainable environment. Their Farm Forestry program generates more wood on the earth than they consume for their production, in fact, at more than double the rate of its consumption. Their investment towards responsible farm forest stewardship ensures a healthy and productive forest ecosystem. Over a period of time the Respondent have invested in advanced technologies to deliver integrated and sustainable services and products based on excellent quality, safety, health and environment principles. A few notable technologies/facilities implemented are as follows:

State of the Art Technologies that are unique to the 7th Respondent:

i. Bellmer Dewatering Sludge Press for ETP Sludge
ii. ETP Sludge Drier
iii. One of its Kind Odour Control Management i.e., LVHC & HVLC system
iv. Foul Condensate Collection and treatment with H2O2
v. Excellent Spill Control management
vi. 100% cooking effluents segregated and reused under Chemical Recovery process.

In addition to the above, the 7th Respondent has implemented the following advanced technologies:

i. Continuous Cooking Digester Technology.
ii. Environmentally friendly Elemental Chlorine Free (ECF) Process.
iii. Oxygen Delignification bleaching to reduce pollution Load.

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iv. Waste to Wealth: Chemical Recovery Plant to produce Steam, Captive Power, White Liquor for wood cooking and weak white Liquor for reuse.

v. 60 – 65 % captive power generation from Bio Fuels (Black Liquor) management.

vi. Water Conservation from 250 M3 / Ton of product during inception of mill to 55 M3 / Ton of product right now and corresponding effluent reduction, thereby reducing the water consumption substantially, year on year.

vii. Full-fledged Effluent Treatment Plant consists of Primary, Secondary & Tertiary Process.

viii. Reclaimed Back Water System for reuse of effluents from Paper process operations.

ix. Reuse of Evaporator Secondary Condensates to reduce effluent load.

x. Turbo Air Blower for ETP Aeration system

xi. Used Oil recycling into non-critical equipment to reduce waste.

xii. Drinking Water Supply to Surrounding Communities @ 2500 M3 / day.

xiii. Farm Forestry: Revenue generation to farmers & Waste Lands become the means of employment.

The above technologies and facilities ensure sustainable growth through a smart investment portfolio leading to environment friendly growth and to adherence to the compliance standards set by the concerned authorities such as MOEFCC, APPCB, SEIAA and other statutory Authorities.

5. Fully Compliant Manufacturing Plant

The 7th Respondent submits that they are an integrated paper and pulp manufacturing industry with a Captive Power generation Plant (CPP) within its premises. The permitted capacity of production as per the Consent for Establishment (CFE) dated 20.10.2014 **(ANNEXURE-1)** and later extension dated 14.12.2021 **(ANNEXURE-2)** valid upto 20.10.2024 issued by the APPCB is as follows:

Paper production – 593 TPD (2,07,550 TPA)
Pulp Production – 650 TPD (2,27,500 TPA)
Captive Power plant – 46 MW

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The 7th Respondent has obtained the necessary Environment Clearance (EC) from the MOEF dated 31.01.2005, later on 26.02.2010 and 06.03.2014, amended on 12.12.2014 and the same extended up to 05.03.2025 vide its proceedings dated 28.04.2022 and further amended on 24.03.2023 **(ANNEXURE-3)**. The necessary Consent for Operation (CFO) has also been obtained on 02.04.2018 from the APPCB and later amended and validity extended upto to 30.06.2028 **(ANNEXURE-4)**. The 7th Respondent has been strictly compliant with all the directions and guidelines issued by the all the environmental and pollution control/regulatory authorities for carrying out the production process.

6. Production Process:

The processes involved in the production of pulp, paper and treatment of effluents by the 7th Respondent are explained in brief as follows:

Stage-I : Raw material preparation

The 7th Respondent submits that their paper production primarily requires wood pulp as a raw material. The plant employs wood chippers for processing of transported wood blocks. The chips are screened for separation of fines and the sawdust is used as a biofuel in the power boiler to generate power.

Stage-II: Cooking

The screened chips are fed into continuous digesters for cooking. These chips are mixed with recycled caustic soda (known as white liquor) for pulping. This system gives better productivity and more uniform quality of pulp. Out of this process, black liquor which is rich in Lignin is generated and is concentrated through an evaporator and the same is burnt in the recovery boiler to generate power and steam.

Stage-III: Pulp washing

The unbleached pulp produced through the cooking process is subjected to washing through counter current brown stock washers. The washed pulp is then sent for bleaching.

Stage-IV: Oxygen delignification & pulp bleaching:

The unbleached wood pulp is subject to oxygen delignification followed by screening and cleaning through pressure screens. This is followed by ECF bleaching to eliminate residues leaving out the white pulp. The white pulp is stored in towers, which gets diluted before pumping to paper machines.

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Stage-V: Stock preparation & paper making:

The bleached pulp is pumped to the mixing chest where chemicals like filler, starch, sizing chemicals are added as per requirement. The pulp from stock preparation section is diluted with back water and then passed through pressure screens to remove impurities. It then goes to synthetic wire mesh through head box. The water is drained and the fibres are oriented to form sheets. The sheets so produced is picked up and then pressed between rolls to squeeze out water by pressing. The wet paper is then dried and converted into reels/slash sheets and then packed for dispatch.

Stage-VI: Effluent Treatment:

The plant sources its water from Godavari River which after appropriate treatment in the raw water treatment plant is sent to a reservoir. The water from the reservoir is distributed to various process operations as per requirement. The effluent generated from the integrated pulp and paper manufacturing process is treated at Effluent Treatment Plant (ETP). The effluent is segregated in three different streams.

Stream-1: The waste water from paper machines 2, 3, 5 and 6 goes for "Reclamation clarified back water plant". After clarification, the backwater is being reused in pulp mill and paper machines. A part of the generated fiber sludge from this clarification process is supplied to small board and egg tray manufacturers for use as raw material their beneficial use as per Consent permit.

Stream-2 & 3: The wastewater from paper machines 1 and 4, pulp mill, DM plant, recovery boiler, coal fired boilers, Rotary lime kiln and mill domestic wastewater are treated in the ETP having capacity treatment of 45,000 KLD of wastewater. The Effluent pre-treatment system is having mechanical grit and foreign separation system before going to raw effluent collection tanks. The raw effluent is pumped to Primary Clarifier in continuous mode. The underflow of Primary Clarifier is passed through sludge dewatering machines and the resultant sludge cake is sold to egg tray manufacturers and partly burnt in coal fired boilers. The overflow of primary clarifier is passed through cooling tower to reduce effluent temperature.

The effluent is further biologically treated in Aeration tanks 1 and 2 having Diffused Aeration System. Later nutrients are added to aeration tank for growth of microorganism. The overflow of aeration

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tank is further passed through 2 no's of Secondary Clarifiers for removal of suspended active biomass. A part of the Secondary Clarifier underflow is recycled to the aeration tank to maintain a desired level of active biomass and the rest is passed through sludge dewatering machine. The Secondary Clarifier's overflow sent to Tertiary Clarifier and the overflow which is the final treated effluent is disposed of at the sand shoals at Turupulanka Island of Godavari River for percolation. This is done as per the Consent given by APPCB.

A Flow meter is installed at the treated effluent discharge outlet for monitoring of the total effluent flow to final disposal point of the Sand Shoals. The Biochemical Oxygen Demand (BOD), Chemical Oxygen demand and parameters as per consent are being monitored at the exit point of the effluent discharged at the Sand Shoals and the same is well within the stipulated limits. The effluent that is discharged gets percolated beneath this sand shoals over the next few days further reducing its BOD levels and later eventually joins the water stream of the Godavari river. River water is fit for Class – B & C as CPCB guidelines. The entire process explained above is carried out using environmentally sustainable mechanisms and technologies and as such the same is very well compliant with the directions and norms stipulated by the MOEF and APPCB.

7. The 7th Respondent submits that though they have been carrying out their production process in adherence and compliance with all the stipulation under the environmental clearance and consents issued under the Water (prevention and control of pollution) act, 1974, Air (Prevention and control of pollution) act of 1981, environment protection act, 1986, hazardous wastes (Management and Handling and Transboundary movement) Rules, 2008 and other applicable laws and rules, the Applicants herein have come up with the present Application making completely false and baseless allegations against this Respondent with the sole ulterior motive to harass this Respondent and to serve their vested interests.

8. It is necessary here to point out that the 1st Applicant herein, Nukatati Rajasekhar was a contract workman who was employed at the 7th Respondent's very same plant. He worked for a considerable period at the Plant and was removed from service by his contractor, K.Ganesh who is a fabrication contractor for the Plant. The 1st Applicant was removed from service due to his lack of attendance at the work site. Thereafter when he approached this Respondent to report for work, he was not permitted to work since his contractor has issued a written

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instruction to this effect. The letter dated 06.03.2021 issued by K.Ganesh, Fabrication Contractor informing the 7th Respondent that the 1st Applicant has been removed from service and requesting the 7th Respondent to note the same is filed herewith as **ANNEXURE - 5**. It is therefore quite clear that the 1st Applicant has filed this Application with an ulterior motive to avenge his removal from service. The 1st Applicant's sole intention is to harass this Respondent by filing the Present Application. On the factual and legal merits, the paragraph wise rebuttals of the allegations made in the Application are set out as follows.

9. This Respondent denies the allegations contained in the paragraph No.1 of the Application, except those that are specifically admitted hereunder as false and baseless. When this Respondent was initially started in the year 1920, there was no habitation around the plant. Slowly residents and habitation started to come up without considering the necessity to maintain minimum buffer zone around industrial establishments. This respondent is not aware as to whether the residential and other settlements that have now come up near their plant have been duly approved by Authorities. At the time of granting approvals of residential and other settlements in the vicinity of the existing industrial establishment, the approving authorities are bound to insist on the adherence to the applicable minimum buffer distance. The colony area of Kotilingalapeta and other areas as stated by the Complainant is situated on a narrow patch of river bund area running parallel to the river bank and the outline demarcated boundary wall of the respondent Andhra Paper Limited. These river bund areas between the Godavari river bank and the respondent boundary wall are mostly illegal encroachments being close proximity to the river. The residents staying in these areas have built their houses along the boundary compound wall and often trespass causing safety concern to the property.

10. This Respondent vehemently denies the allegations of air, odour and water pollution made by the Applicants. These allegations are separately dealt with under the following heads:

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a. Air Pollution Control :

This Respondent submits that all their source emissions from the stacks are controlled by Electrostatic Precipitators (ESP). The main source of Air pollution, if any is from the stacks of Recovery boiler, Coal fired boiler, Rotary lime kilns – 1 & 2. All these stacks are provided with ESPs for control of air pollution. Air pollution control equipment is well maintained and overhauled from time to time for sustainable performance. This Respondent focuses on sustainable and reliable operation of Air Pollution Control Systems (APCS) and investing on continuous basis year-on-year under preventive maintenance program. During the Financial year 2022-23, this Respondent spent Rs.8.69 crore for renovation of the ESPs. They are operating in an environmentally sustainable and ethical way for controlling the air pollution. All the four stacks fitted with online continuous emission monitoring analysers and the data therefrom are immediately transmitted to the CPCB and the APPCB sites.

The details of ESPs employed are tabled below:

Recovery Boiler -4 stack	ESP – 3 no's	Total : 3+3+5 = 11 fields
Coal Fired Boiler - 6 Stack	ESP -1 No	Total : 3 fields
Rotary lime kilns - 1 stack	ESP -1 No	Total : 2 fields
Rotary lime kilns - 2 stack	ESP -1 No	Total : 3 fields

b. Odour Control:

The odour control systems provided at the Plant is one the best and unique among Indian Paper industry. Other paper industries are visiting this Respondent's Plant to study and adopt this infrastructure for their establishments. In the year 2014–15, the 7th Respondent engaged M/s. Lundberg – USA for evaluation of odour control systems and to suggest best technologies/alternatives and for upgradation requirements of existing systems to address odour. At that time, the US International Paper's (7th respondent's former entity) Subject Matter Experts (SMEs) guided and monitored the execution and commissioning of below projects at a cost of Rs.11.64 crore;

1) Hard Piping System for collection and treatment of Foul streams with hydrogen peroxide.

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2) Up gradation of existing LVHC NCG Incineration System
3) Up gradation of existing HVLC NCG Incineration System

i. A detailed report in this regard was submitted by this Respondent to the APPCB vide letter no: IPAPPM/ENV/2018/12/12-261, dated 22.12.2018 on completion of said projects for compliance. The odour compounds in ambient air is being regularly tested by this Respondent in Rajahmundry city and the values are in the range of Below Detection Limit (BDL) to 1.5 PPM with respect to H2S and all most BDL with respect to Methyl Marcaptane. These values are well below the Thresh hold Limit Value (TLV) as per International standards of American Conference of Governmental Industrial Hygienists (ACGIH) applicable for work zone which is 10 PPM and 0.5 PPM respectively. These reports are being regularly submitted to the APPCB Regional Office.

ii. It is necessary here to note that there are no prescribed limits for H2S and Methyl Marcaptane smell emitting compounds, stipulated under the Indian Law with reference to the National Ambient Air Quality standards Notifications issued by the CPCB dated 18.11.2009 or under any other regulations **[ANNEXURE - 6]**. However, this Respondent follows international standards that are applicable for similar cases. The above facts go to show that this Respondent is maintaining proper odour control system and the habitation area monitoring values are well within acceptable limits with reference to International norms. Therefore there is no impact on health of surrounding habitants.

iii. The physical sampling for Ambient Air Quality monitoring is being done by MOEFCC and NABL accredited 3rd party laboratory at a total of 4 locations of this Respondent's premises, and the reports are being submitted to APPCB and the MOEFCC. These reports are filed for the reference of this Hon'ble Tribunal as **ANNEXURE – 7.**

iv. The periodical monitoring reports of and the report of this Respondent, Report of the APPCB dated 09.05.2023 and 3rd

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party Test reports at the 7th Respondent's Premises as well as in the Rajahmundry city are filed herewith as **ANNEXURES 8**.

v. The details and photographs of odour control infrastructure at the 7th Respondent's Premises are filed herewith for the perusal of this Hon'ble Tribunal as **ANNEXURE 9**.

c. **Water Pollution Control:**

The effluent generated from integrated pulp and paper manufacturing process is treated at Effluent Treatment Plant (ETP) through extended Activated Sludge Process. Effluent are segregated in to three streams, namely:

Stream – 1 : Paper Machines 2,3,5 and 6
Stream – 2 : Paper machines 1& 4
Stream - 3 : Pulp mill, chemical recovery and utilities & other

Collection, Storage, Treatment & Disposal:

Stream – 1

i. The Paper machines 2, 3, 5 & 6 waste water is going to Reclamation Clarified Back Water Plant, through perforated screens. It consists of collection tank, Clarifloulator & treated reclaimed back water collection tank.

ii. The clarified back water is being reused in pulping process, paper machines & other washings. The surplus water is goes to ETP for treatment.

iii. The under flow sludge from Clarifloulator is being sent to White Thickener. Then the bottom white sludge from White Thickener is withdrawn and processed through Dewatering press. The White fiber sludge coming from press is being sold to Egg Trays manufacturer for their use as per CFO.

Stream – 2 & 3

i. The waste water from the paper machines 1 and 4, surplus water from paper machines 2, 3, 5 and 6, Pulp mill, chemical recovery, utilities and other areas are being treated in Effluent Treatment Plant directly.

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ii. The Effluent treatment system consists of primary, secondary & tertiary treatment process.

iii. Effluent / Waste water is being conveyed to ETP from various section is collected in primary collection tanks, this effluent is passed through bar screens and perforated screens to remove all silts and other foreign materials before entering into these collection tanks.

iv. From these primary collection tanks, effluent is being pumped to Primary Clarifier for separation of Suspended and colloidal matter. It works on mechanical scrapper mechanism.

v. The Primary Clarifier underflow sludge is removed from bottom drainage system and passed through Sludge Dewatering Machines and followed by ETP sludge drier. The resulted dried ETP sludge is being disposed to in house coal fired boilers for reuse as per CFO.

vi. The Primary Clarifier overflow effluent goes to Cooling tower to reduce temperature and then passed to Aeration Tanks. There are 2 No's of aeration tanks runs in parallel.

vii. Chemical oxidation and Biological degradation takes place in Aeration tanks which is attached with air blowers & diffusers. Required nutrients is being added to develop microbial population. The over flow of aeration goes to Secondary clarifiers, where biomass solids tend to settle. Part of (MLSS) settled biomass is being recirculated to aeration tank to maintain required microbes in the system and part of dead or aged Biomass is being withdrawn from the system and sent to Sludge dewatering machines and then to drier.

viii. There are two secondary clarifiers being operated in parallel.

ix. Secondary clarifiers overflow goes to Tertiary Clarifier.

x. Polymer dosing is applied in Tertiary clarifier for further setting and polishing. The outlet to Tertiary clarifier is called final treated water.

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xi. The above treated effluent is then subjected to further tertiary treatment through engineered land application for further reduction of BOD at Sand Shoals of Turupulanka Island in Godavari river for percolation as per consent issued by the APPCB. The know-how and designs for this unique initiative was provided by Central Public Health Engineering Research Institute (CPHERI) –now known as CSIR-NEERI.

xii. Daily effluent quality monitoring is being done at company ETP Laboratory and also by external NABL certified agency once in a month. The quality of treated effluent is meeting the stipulated norms and these reports are being submitted to APPCB.

xiii. Online real time effluent quality monitoring is in place for pH, Total Suspended Solids, COD, BOD & Flow rate and is connected to CPCB & APPCB sites.

d. <u>ETP SLUDGE HANDLING SYSTEM:</u>

The 7th Respondent plant has installed one of the best technologies that is superior to any other facility in the Indian paper industry. Infact, this Respondent is the only establishment that has installed the ETP sludge dryer in the Indian paper industry. This ETP sludge handling system of this Respondent comprises the following features:

i. Bellmer Press for handling of Primary and secondary ETP sludge to obtain dryness of 35%.

ii. The above obtained 35 % dried sludge is taken to "SLUDGE DRIER" to obtain 85% dryness and is being fed to coal fired boiler as biofuel as per Consent issued by the APPCB. The Gross Calorific Value (GCV) is around 2000 Kcal/Kg.

iii. Andritz Press for handling Realmation back water system white fiber sludge to obtain 35 % dried cake and is being sold to egg tray manufacturers as per consent.

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The flowchart, Photos and technical details of ETP unit operation and the 3rd party effluent analysis reports are filed herewith for the perusal of this Hon'ble Tribunal as **ANNEXURE-9**.

e. GODAVARI RIVER WATER QUALITY

i. This Respondent denies the allegations of discharging untreated chemical waste and effluents into the Godavari River causing pollution as false and misleading. The APPCB has been monitoring the water quality of river under National Water Monitoring Programme on monthly basis at upstream, downstream of Andhra Paper disposal point and other locations. Andhra Paper Limited also collecting and testing the river water samples by NABL accredited third party for once in three months. The water quality is conforming to the CLASS – B as per CPCB criteria.

ii. The APPCB has submitted ACTION PLAN FOR REJUVENATION OF RIVER GODAVARI, RAJAMAHENDRAVARAM, Under PRIORITY – V to CPCB, New Delhi. The concluding remarks by the board is extracted below for easy reference:

"As per the NWMP data for the years from 2014-19, it was observed that F.Coli levels are less than 500 MPN/100 ml. The BOD levels recorded are less than 3 mg/l except in the month of May, 2016. As the BOD and F. Coli levels are within the outdoor bathing standards, during the years 2017, 2018 & 2019, it is requested that Godavari River Stretch may be deleted from the list of 351 Polluted River Stretches identified by CPCB".

iii. The Godavari river Stretch from Rayanpeta (Upstream of Andhra paper Ltd) to Rajamendravaram (Downstream of Andhra Paper Ltd) is comes under the Category – V = Good or Fit for Bathing with the Total score is ≤ 20 as per CPCB guidelines.

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CPCB Classification of Surface waters in India

Designated-Best-Use	Class of water	Criteria
Drinking Water Source without conventional treatment but after disinfection	A	Total Coliforms Organism MPN/100ml shall be 50 or less; pH between 6.5 and 8.5; Dissolved Oxygen 6mg/l or more; Biochemical Oxygen Demand 5 days 20C 2mg/l or less;
Outdoor bathing (Organised)	B	Total Coliforms Organism MPN/100ml shall be 500 or less; pH between 6.5 and 8.5; Dissolved Oxygen 5mg/l or more; Biochemical Oxygen Demand 5 days 20C 3mg/l or less;
Drinking water source after conventional treatment and disinfection	C	Total Coliforms Organism MPN/100ml shall be 5000 or less; pH between 6 to 9; Dissolved Oxygen 4mg/l or more; Biochemical Oxygen Demand 5 days 20C 3mg/l or less;
Propagation of Wild life and Fisheries	D	pH between 6.5 to 8.5 Dissolved Oxygen 4mg/l or more Free Ammonia (as N) 1.2 mg/l or less
Irrigation, Industrial Cooling, Controlled Waste disposal	E	pH betwwn 6.0 to 8.5 Electrical Conductivity at 25C micro mhos/cm Max.2250 Sodium absorption Ratio Max. 26 Boron Max. 2mg/l
	Below-E	Not Meeting A, B, C, D & E Criteria

iv. The Godavari water quality from Rayannapeta (Upstream of this Respondent Plant) to Rajamendravaram (Downstream of this Respondent Plant) is conforming to the CLASS – B as per CPCB criteria.

v. The Action Plan for Rejuvenation of River Godavari, Rajamahendravaram prepared and submitted by APPCB to CPCB as per the directions of this Hon'ble Tribunal is filed herewith as **ANNEXURE-10**.

vi. This fact is further reaffirmed by the statement made by the Minister for Jal Shakti, Government of India, Sri. Bishweswar Tudu at the Rajya Sabha on 03.05.2023 on the Godavari river water

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quality. The Minister stated that there were no plans to initiate "Namami Godavri" scheme. The Minister said there is no pollution in Godavari, responding to a question raised by one of the MP in the Rajya Sabha on 03.04.2023. He added that, while the CPCB report in 2018 had mentioned Godavari was partially polluted from Rayannapet to Rajamhendravaram, this observation was removed from its report in 2022. The news article published in the Indian Express dated 04.04.2023 is filed herewith as **ANNEXURE 11** for reference of this Hon'ble Tribunal. The recent River quality test report conducted by 3rd party labs are is filed herewith as **ANNEXURE-12**

All the above materials and facts clearly indicate that there is no adverse impact on Godavari river water quality due to this Respondent's operations and treated effluent disposal methods which is being scrupulously followed by it since its inception and being enhances further year-on-year moving towards sustainability by investing on environmental pollution abatement.

11. The averments made in paragraph 2 of the OA true except for the misleading allegation on the green cover of the Plant. The details of the green cover is set out as follows:

	TOTAL AREA	
	MANUFACTRUING AREA	**Acres**
1	Total land	**113.33**
2	Rooftop area of buildings/sheds	27.15
3	Road/paved area	8.18
	INSIDE COLONY AREA	
1	Total land	**19.1**
2	Rooftop area of buildings/sheds/ roads	2.07
	WOOD YARD AREA	
1	Total land	**65.66**
2	Rooftop area of buildings/sheds	0.5
3	Road/paved area	2.39
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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12. It can be seen from the above table that the Green belt area coverage is about 33% of the total area as per the prescribed norms. Even during this rainy season from June to August, 2023, approximately 600 saplings have been planted in 1.00 Acre across the premises. It is further submitted that Green cover is also being maintained by this Respondent outside its industrial premises under Social-agro farm forestry programme in various districts of Andhra Pradesh. As of the end of 2022, nearly 1.972 billion saplings have been planted & Covered nearly 6,90,442 acres. A total of 11,947 acres of land has been covered by distributing 61,95,000 Clones and 3,23,49,000 seedlings to farmers during the financial year 2022-23 and the same is a continuous program for circular economy for sustainable wood supplies and also for ecological balance of greenbelt. This supports and helps Improve socio-economic status of the nearby less privileged farming communities.

13. This Respondent vehemently denies the allegations made in paragraph 3 of the OA as false and baseless. This Respondent submits that the expansion of activities in various years as averred in paragraph No. 2 have been obtained with due approval of MOEF CC, SEIAA and the APPCB. All the conditions stipulated under these ECs are being duly complied with by this Respondent.

14. This Respondent submits that they are not releasing or discharging polluted water or any type of chemical waters into River Godavari. As explained in the above paragraphs in detail, all the waste waters or rejected chemicals from manufacturing operations are properly treated in an effective Effluent Treatment Plant consisting of Primary, Secondary and tertiary unit processes and the final treated water after meeting stipulated norms is being discharged under closed pipe line into sand Shoals of Turupulanka Island which is in the middle of the Godavari river as per the APPCB consent. The disposal point and method is approved and designed by then NEERI – Nagpur. This Sand

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Shoals further act as a tertiary treatment point. It involves engineered land treatment with Phytoremediation technique by using plants and associated soil microbes to reduce the concentrations or toxic effects of contaminants further in the treated water. This is a unique disposal method to discharge into sand shoals of river rather direct discharge to river stream unlike other paper industry in India. Infact, the treated effluent even if directly discharged into the river rather than the sand shoals, the same satisfies the prescribed BOD levels 30 mg/l that is prescribed under the CFO by the APPCB. However, this Respondent implements an additional process of discharging into the sand shoals so that the BOD levels are further brought down to less than 3 mg/l before joining the river water stream. The detailed ETP process and monitoring mechanism have been sufficiently explained above. Moreover, the water quality of the Godavari river is discerned from the CPCB reports published in 2022 and the same has also been endorsed by Minister for Jal Shakti, in the parliament.

15. As regards the allegations of the storage tankers and liquor boilers affecting human health, this respondent denies the same and submits that the installation of Chemical Recovery Boiler (Liquor Boiler) for reuse of Black Liquor generated from pulping process is an upgraded technology in Indian Paper Industry and is mandated as per Corporate Responsibilities for Environmental Protection (CREP). The CREP was formulated jointly by CPCB and the Ministry of Environment & Forests (Govt of India) in close association with Industries Associations, SPCBs and experts in March 2003 to mitigate the environmental problems caused by pulp and paper industries. One of the action plans as per CREP is to reuse and recycle Black Liquor by installation of evaporators, Chemical recovery boilers and lime kilns to produce reusable products like steam, captive Power, white liquor and week white liquor in order to utilize back in the processes as an input raw materials. Due to this process being implemented at this Respondent's plant, there is absolutely no impact on human health in surrounding habits. On the contrary, it is an

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environmental friendly and positive aspect reducing fossil fuel consumption to generate captive power and supports natural resource conservation. The related storage tanks are fully closed and vents are connected to incineration system to eliminate any fugitive emissions.

16. The allegations that the unit has been releasing black smoke and chemical gases into open atmosphere are totally denied as baseless and misleading. As explained in detail in paragraphs above, this Respondent is not releasing smoke and chemical gases into open atmosphere. The stack emission is controlled by ESPs and all other process gases are collected in closed piping system for incineration either in Chemical Recovery Boiler or in Rotary Lime Kilns. The stack emission is monitored by NABL certified third Party and also online monitoring analysers installed and connected to CPCB and APPCB. The Fugitive emission monitored from the ambient air quality of Rajamhendravarm city shows that the values are well within norms. All the above facts clearly goes to establish the fact that there is no environmental pollution and no health effects caused by this Respondent in the vicinity.

17. The allegations made by the Applicants in paragraph 3 of the application are once again absolutely false and misleading. In this regard, a comparison of the conditions of the EC dated 06.03.2014 and the compliance report filed by this Respondent dated 29.11.2021, will go to show that this Respondent is in compliance of the conditions of the EC dated 06.03.2014. The details are as set out in the table here below:

Conditions of MoEFCC	**Alleged Violation/compliance by Unit**	**Compliance by the 7th Respondent**
General Condition (iv) of EC Industrial waste water shall be properly collected, treated	Industrial effluents are being treated in ETP consists of Primary and Secondary	**1)** Industrial effluents are being treated in ETP consists of Primary, Secondary & Tertiary processes & further land treatment for percolation in Sand shoals of Turupulanka

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<td>so as to conform to the standards prescribed under GSR 422 (E) dated 19th May, 1993 and 31st December, 1993 or amended from time to time. The treated wastewater shall be utilized for plantation purpose. Specific Conditions:</td>
<td>processes. The treated effluent is partly used for green belt and washing within the premises and remaining is being discharged into Turupulanka sand shoals of Godavari river as per APPCB Consent norms</td>
<td>Island of River Godavari spread over 150 acres as per APPCB CFO permit. This engineered land application is being act as tertiary polishing treatment. This was designed as recommend by NEERI.

2) The treated effluent is partly used for green belt and washings within the premises an average of 395 KLD during FY 2022-23 and remaining is being discharged into Turupulanka Sand shoals of Godavari river as per APPCB Consent norms. Treated effluent supply pipe line laid along the entire plant to use it for plantation purposes.

3) <u>ETP consists of:</u>
<table>
<tr><td>Influent collection tanks</td><td>1 no</td></tr>
<tr><td>Reclaimed Back water & collection, reuse system</td><td>2 Collection tanks with clarifloculator.</td></tr>
<tr><td>Primary Clarifiers</td><td>1 no</td></tr>
<tr><td>Cooling tower</td><td>1 no</td></tr>
<tr><td>Aeration tanks</td><td>2 no's</td></tr>
<tr><td>Secondary clarifiers</td><td>2 no's</td></tr>
<tr><td>Tertiary Clarifier</td><td>1 no</td></tr>
<tr><td>ETP Sludge dewatering presses for Primary, secondary clarifiers & for Thickener.</td><td>2 no's</td></tr>
<tr><td>ETP Sludge drier</td><td>1 no</td></tr>
<tr><td>White sludge thickener</td><td>1 no</td></tr>
<tr><td></td><td></td></tr>
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</td>
</tr>
<tr>
<td>Specific Conditions:
ii. The project authority shall install multi</td>
<td>Gaseous emission generated from both process and flue gas stacks of Recovery Boiler</td>
<td>1) Multi cyclones and wet scrubbers are not technically feasible for high pressure and high capacity boilers which cater the needs of high pressure</td>
</tr>
</table>

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cyclones, wet scrubbers with boilers to achieve the particulate emission below 50 mg/Nm3. The emissions from chemical recovery section shall be controlled through primary and secondary venture scrubbers	(RB-4), Coal fire Boiler (CF-6), Rotary Lime Kilns (RLK) No. 1 & 2 are being controlled through ESPs.	steam and captive power generation for manufacturing operations. 2) Venturi Scrubbers are also not feasible for chemical recovery boiler and lime kilns. 3) Electrostatic Precipitators (ESP) are the best technology to control stack dust emission and is the superior than multi cyclone, Wet scrubbers & Venturi scrubbers. 4) All the stacks are provided with ESPs for control of emission. Air pollution control equipment is well maintained and overhauled from time to time for sustainable performance. Andhra Paper focusing sustainable & reliable operation of Air Pollution Control systems and investing on continues basis year on year under preventive maintenance program. During FY 2022-23, we incurred Rs.8.69 cores for renovation of ESPs. We are operating in good sprit and ethical way for control of air emission. 5) All the four stacks fitted with online continues emission monitoring analyzers and data transmitted to CPCB & APPCB sites. 6) Details of ESPs are tabled below:

Coal fired Boiler (CF.6)	ESP – 1 No	3 Fields
Recovery Boiler (RB.4)	ESP – 3 Nos	3+3+5 = 11 Fields
Rotary Lime Kiln (RLK.1)	ESP – 1 No	2 Fields
Rotary Lime Kiln (RLK.2)	ESP – 1 No	3 Fields

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		7) Monthly monitoring is being done by MOEFCC & NABL approved external third party laboratory. These reports are being submitted to SPCB on monthly basis and half-yearly basis to MOEFCC. 8) Emission is well within the prescribed norms. During maintenance, there are some peaks in the emission values and overall day averages are well within the norms.
iv. In case of treatment process disturbances/failure of pollution control equipment adopted by the unit, the respective unit shall be shut down and shall not be restarted until the control measures are rectified to achieve the desired efficiency.	All processes are DCS controlled operational and monitored. All processes including pollution control systems are either interlocking arrangement or manual controls. If the pollution control equipment fails to perform, related processes is being slow down or stopped based on impact and compliance rate. In case of ETP units break downs, Effluents are diverted and stored in buffer storage Lagoon till it is rectified. Lagoon storage capacity is approximately 9000 m3.	It can be seen that there are sufficient back up processes implemented by the 7th Respondent in the event of any disturbances failure of the pollution control equipment. All such above scenarios are being intimated to APPCB.
xi. The company shall develop green belt in 33% of the total	Project Proponent states that Green Belt is 65 Aces, Wood Yard is	1) Green Belt is around 33%. 2) The land details are given below:

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land as per the CPCB guidelines to mitigate the effect of fugitive emissions.	86.34 acres. But the total area of the Unit is 123.86 acres only.	<table><tr><td>**Total Plant Area (Mill + Inside Colony)**</td><td>**198.09 Acres**</td></tr><tr><td>**Roads & Build Up area**</td><td>**40.29 Acres**</td></tr><tr><td>**Wood Yard, Truck Parking, Open area**</td><td>**91.8 Acres**</td></tr><tr><td>**Green Belt (33%)**</td><td>**66.0 Acres**</td></tr></table> 3) Green cover is also being maintained outside industrial premises under Social agro farm forestry programs in various district of Andhra Pradesh to sustain wood raw material without adverse impact on environment: <table><tr><td>Year</td><td>Acres covered</td><td>Clones distributed To farmers</td><td>Seedlings distributed farmers</td></tr><tr><td>**FY 2022-23**</td><td>**11,847**</td><td>**61,95,000**</td><td>**23,49,000**</td></tr></table>
xv. All the commitments made to the public during the Public Hearing/Public Consultation meeting held on 21.9.2011 shall be satisfactorily implemented and a separate budget for implementing the same shall be allocated and information submitted to the Ministry's Regional Office at Bangalore.	Commitments made in the public hearing are being implemented. There is a CSR wing with a separate budget as per companies Act. (That the company assured the applicants & public on 04.10.2022 to reduce the smell nuisance and water pollution. But it is not complied.)	Commitments made during public hearing dated 21.09.2011 has been completed. **The point wise details are given below:** 1) **Drinking water supply to surrounding Communities of Kotilingalapeta, Mallayapeta, Ananda Nagar etc.** Safe Drinking Water supply through closed pipe line with various user tap points in kotilingalapet has provided. There are twenty (20) user tap points were arranged in kotilingalapet at various locations for residential use. Which includes Kailash Bhoomi, Shivalayam & Vedhapatsala also. Apart from Kotilingalapeta,

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		Andhra Paper has been supplying Safe Drinking Water to surrounding villages of Mallaiahpeta, Katheru, Anand Nagar by closed pipe line. **2) Katheru Village :** Permeant Drinking water supply with 300 M3 capacity storage tank along with close pipe line from factory made at cost of around Rs.135 Lakhs. **3) Kadiyam Village :** Construction of water sump & pipeline at a cost of Rs.135 Lakhs for safe drinking water supply. **4) Qualified local people be given priority in employment opportunities:** 95% of employees working in Andhra Paper Ltd., belong to local area only. This clearly indicate Andhra Paper vision & responsible care. It was certified by Dy. Commissioner Of Labour letter dated 11.01.2022. Copy of the letter is filed herewith as **ANNEXURE-13** for reference of this Hon'ble Tribunal. On 01.12.2011, Andhra paper has given employment to 19 people from Kotilingalapeta as committed in Public hearing. Another 14 persons already in 7th Respondent's rolls. List of employees is filed herewith as **ANNEXURE- 14** for reference of this Hon'ble Tribunal. 5) Industry is allocating funds under CSR as prevailing rules & these funds are used for the needy and less privileged in areas of Education, Health,

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		Community welfare, women empowerment, upskilling etc: The details are CSR spending from last 5 years is tabled hereinafter: FY 2022-23: Rs.304.21 Lacs spent against CSR obligation of Rs. 279.4 lacs. Excess spent by Rs.24.71 lacs. Detailed break up of various Socio Economic developments undertaken with CSR funding is filed herewith as **ANNEXURE-15** for reference of this Hon'ble Tribunal. As for the Letter dated 04.10.2023 issued by the representative of this Respondent, it is necessary here to clarify that the meeting was not related to alleged pollution. The unemployed in that area surrounding the Plant had demanded employment, CSR activities and Drinking water taps for each street. The respondent Company has made provisions for supply of clean drinking water on daily basis to all the neighbouring areas including Kotilingalpeta to overcome shortage during summer. Particularly for this colony dedicated pipe lines for drinking water have been laid by this Respondent. This issue is being manipulated by the Applicants and as such misleading.

	Financial year (Rs. In Lacs)				
Particulars	**2018-19**	**2019-20**	**2020-21**	**2021-22**	**2022-23**
Opening Balance	0.000	0.000	129.06	230.00	165.00
CSR Obligation for the year	111.32	287.02	418.00	367.00	279.50
Amount commited for	111.32	287.02	418.00	367.00	279.50

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the year					
Expenditure incurred	0.00	157.96	188.00	202.00	304.21
Expenditure incurred (Prev Yr Project)	0.00	0.00	129.06	230.00	166.34
Unspent Carried Forward to next year	0.00	129.06	230.00	165.00	-24.71

18. As regards, the allegations made in paragraph 5 of the Application, this Respondent denies the same and submits its defense and details of its compliances to the Directions issued under the MOEF's order dated 27.07.2015, in the table as follows:

S.No	Direction of MOEF	Compliance by 7th Respondent
1	The industry shall undertake study of alternate discharge option perfectly into sea directly and feasibility by 31.12.2015.	M/s. CII- Triveni Water Institute completed "Feasibility study for Exploring the alternative options for effluent discharge" on 20.01.2017 and the same was submitted to APPCB on 22.04.2017. **The chronological events and status as per the APPCB as on 04.08.2022** is filed herewith as **ANNEXURE-16** for reference of this Hon'ble Tribunal. **Latest Status :** • The APPCB External Advisory Committee (EAC - Task Force) reviewed the feasibility during meeting on 13.01.2023. • APPCB EAC committee noticed that the 7th respondent identified professional agency and forwarded the profile of that agency to APPCB for review and suggestions. • Environmental Engineer, APPCB, Kakinada was directed to verify the competence of professional agency M/s. GSI Planning and management – New Delhi for preparation of DPR and tender document within a period of three (3) months for marine discharge pipe line. Further he was also directed to submit data within 15 days, on all industries having potential to discharge into surface water courses, located in the

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	The industry shall furnish lease agreement for renewal of Turupulanka and sand shoals the river Godavari till the alternative discharge is taken up.	down stream of the 7th Respondent to from a consortium for laying marine discharge pipe line into the Bay of Bengal 1) Pursuant to the lease period **1999-2009, a further period of 33 years Lease recommended on 14.08.2014:** The Chief Commissioner of Land Administration & Special Chief Secretary to Govt. Of A. P recommended Turupulanka Island lease renewal from 1999 to till 2009 and for a further period of 33 years and forwarded recommendation to Government on 14.08.2014 for further action **(ANNEXURE – 17).** The same is pending action from the Government. 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 (ANNEXURE – 18)** subject to enhancement of 10% of present market value as lease amount with provision for enhancement of lease amount in a block period of 5 years. 3) The District Collector, East Godavari communicated vide ref. E1/495/2016, dated 04.2016 **(ANNEXURE – 19)**, stating that the matter is referred to Sub – Collector, Rajahmahendravaram 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.** 4) **Committee headed by Sub-Collector inspected** Turupulanka on **28.09.2016**. Currently the matter is under process with District Administration. 5) **<u>20.03.2023</u>** : Turupulanka land survey conducted by Office of Tahsildar

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		– Rajamahendravarm Urban on 20.03.2023 so as to submit report to DRO & District Collector to move on land lease. The Tahsildar has also requested the 7th Respondent to make arrangements for their survey team to conduct the survey of the Turupulanka land **(ANNEXURE-20)** vide letter dated 18.03.2023. This has also been duly obliged by this Respondent. 6) Even recently, during a personal hearing on 25.07.2023, the APPCB directed the 7th Respondent to pursue the issue of lease renewal with the District Collector, and pursuant to the same, this Respondent has issued a letter dated 29.07.2023 to the District Collector, East Godavari District **(ANNEXURE- 21)** requesting him to renew the lease. In this respect, this Respondent is pursuing the District administration for further action.
2	Based on above study report comprehensive action plan shall be submitted within four months of completion of study	Awaiting the response of the Government.
3	<u>The above study report shall incorporate the following issues:</u> *Explore feasibility of drains closer to the mill which are already discharging into the sea *Join the scheme if APIIC / other government body lays out dedicated effluent conveyance to Sea. Work with other industries / Municipal Corporation for a pipe line up to dedicated drain / discharge post	The 7th respondent has identified professional agency and forwarded the profile of that agency to APPCB for review and suggestions. The Environmental Engineer, APPCB, Kakinada has been directed to verify the competence of professional agency M/s. GSI Planning and management – New Delhi for preparation of DPR and tender document within a period of three (3) months for marine discharge pipe line. The **letter dated 30.01.2023 issued by the APPCB to the EE, APPCB, RO, Kakinada** is filed herewith as **ANNEXURE-22.** This Respondent submits that they are willing to opt for the "Alternative discharge direct to sea by using existing

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	drinking water intake point of RMC.	natural drains" in the east Godavari district for combined industrial treated effluents, rural / urban sewage and agricultural runoff to be initiated under cluster project by involving all stake holders like en-route industries, local panchâyat, municipalities & irrigation. Such a project will give a permanent solution for industrial effluents discharge without adverse impact on human health and environment, so that there is a scope for development of Industrial corridor in this region.
	*Work with NEERI in upgrading the Turpulanka sand shoals / lagoons for further polishing.	As a socially responsible company, the 7th Respondent is ready to join hands with such scheme that is initiated by the Government. 1) Engaged NEERI for Performance evaluation of ETP including disposal system study. The said report was submitted to board vide Lr. No: IPAPPM/ENV/2017/04-152, dated 22.04.2017 2) Recommendation of NEERI are being implemented and complied with. 3) Turupulanka Sand Shoals system was designed by NEERI at the time of the Plant inception. The Scheme of this system is set out in **ANNEXURE -23.** 4) 81 number of workmen are working in TurupuLanka to perform various actives like adjusting effluents in various lagoons, strengthening of bunds, removal of vegetation and removal of bottom slit on daily basis for effective functioning and maintenance of sand shoals. 5) High level renovation, slit removal and strengthening of lagoons is being done once in year from December to February by engaging more than 400 nos. of workmen along with mechanized systems. The 7th Respondent generates employment to tune of 63,000 man days per annum to local villagers.

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		6) Under CSR the 7th Respondent adopted Venkatanagaram village and created infrastructure development like cement road, drainage, street lights and Safe drinking water RO systems. 7) Under CSR, the 7th Respondent established Safe drinking water supply scheme @ 3,50,000 liters / day in Katheru.
4	Regarding odor problem the foul condensate collection and treatment shall be commissioned by August 2015	Complied with As stated above, the odor control systems provided at the 7th Respondent is one the best and unique among Indian Paper industry. Other paper industries are visiting its Plant to study and adopt the infrastructure provided therein. In 2014–15, the 7th Respondent engaged M/s. Lundberg – USA for evaluation of odor control systems and to suggest best technologies / alternatives and for upgradation requirements of existing systems to address odour. The US International Paper Subject Matter Experts (SMEs) guided and monitored the execution and commissioning of below projects at a cost of Rs.11.64 cores. This system includes: 1) Hard Piping System for collection and treatment of Foul streams with hydrogen peroxide. 2) Up gradation of existing Low Volume High Concentration (LVHC) Non Condensable Gases (NCG) Incineration System 3) Up gradation of existing High Volume High Concentration (HVHC) Non Condensable Gases (NCG) Incineration System A detailed report was submitted by the 7th Respondent to APPCB vide letter no: IPAPPM/ENV/2018/12/12-261, dated 22.12.2018 on completion of said projects for compliance. Regularly odor

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		compounds in ambient air is being tested by Andhra Paper in Rajahmundry city and the values are in the range of Below Detection Limit (BDL) – 1.5 PPM with respect to H2S and all most BDL with respect to Methyl Marcaptane. These values are well below the Threshold Limit Value (TLV) limits as per International standards of American Conference of Governmental Industrial Hygienists (ACGIH) applicable for work Zone, i.e., 10 PPM & 0.5 PPM respectively. These reports are being submitted to APPCB Regional Office. There are no limits prescribed under the Law with reference to National Ambient Air Quality standards Notification of the CPCB dated 18.11.2009 or in any other forms.

19. This Respondent has also duly complied with the directions issued by the APPCB dated 30.01.2017 and the Applicants are attempting to distort the facts to suit their interests. The compliance report is filed herewith as **ANNEXURE-24**. The tabular column showing the compliances made by this Respondent is as below:

S.No	Direction conditions	Compliance Status
1	The industry may be directed to lift the dumped solid waste at Venkatanagaram for safe disposal and also the stagnated leached effluents for further treatment form this place.	***Complied with*** Restorative measures completed by removing wastes from site to authorized egg tray manufacturers and site cleaning activities done as a part of restorative measures. After clearing the waste & debris, toped up with black soil and developed vegetation. ***<u>Action Plans & Compliance:</u>*** *1)* ***ETP sludge dryer installed in Nov. 2019****. ETP sludge is being dewatered in belt presses (Bellmer press) and resultant 60 % moisturized sludge is being fed to dryer to further achieve 10-15 % moisture.* ***The final dried ETP sludge is reused along with coal in the boiler as per Consent.***

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		2) White fibrous ETP sludge is being directly disposed to egg try manufactures for reuse. *3)* ***Monthly Waste disposal details*** *with copies of waste transport manifest are being* ***submitting to APPCB – Regional Office Kakinada.***
2	The industry is not meeting the recommendations of expert committee in respect of temperature of 35 deg.c at the inlet of aeration tank. The industry shall improve the cooling system attached to ETP.	Existing Cooling Tower is being renovated 100 % which includes strengthening of civil infrastructure and replacement with enhanced engineering equipment i.e. internals, drip eliminators, Gear box, fan wings to meet < 35 Deg.c temperature of the effluent outlet which will be fed to Aeration tank. Estimated Cost: Rs.73.714 Lacs. Civil mechanical works have been completed and was commissioned in the 3rd week of August, 2023. Earlier to this action plan, Andhra Paper initiated below actions and completed: 1) <u>Refurbishment of Cooling Tower</u> – Compliance update submitted to PCB on 29.07.2019. • Replaced existing internals with new • New Fan Gear box installed • New FRP Fan wings installed • Structural Beams strengthened • Effluent distribution spray nozzles replaced with new in order to have more surface area contact and increased heat transfer. **<u>Relevant technical data on effluent temperature is given below :</u>** **<u>1) CPPRI Assessment Study</u>** Engaged "Central Pulp and Paper Research Institute" Saharanpur, Uttar Pradesh (U.P), which is a nodal institution under Ministry of Commerce & Industry, Govt. Of India, for "Assessment of Adequacy and Performance Evaluation of Existing Effluent Treatment (ETP)". Cooling tower

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		and Aeration tank biological processes have been found adequate. **2) Bacterial temperatures ref. METCAFF & EDDY publication – Waste Water Engineering** Type of Bacteria / Temp. range for best function / Optimum range of temperature Psychrophilic: 10-30 deg.c / 12-18 deg.c Mesophilic: 20-50 deg.c / 25-40 deg.c Thermophilic: 35-75 deg.c / 55-65 deg.c Mesophilic type of bacteria, which is predominant in activated sludge processes for decomposition of organics present in the waste wasters. Growth rates double with approximately every 10 deg.c increase in temperatures up to Optimum.
3	The industry shall take necessary measures to control fugitive emissions near lime kiln 1 and 2 area.	**Complied with** The following dust control measures / systems installed and commissioned @ Project cost of : Rs.2.84 Cores • **Total 5 no's (DCC.1,1.A,2,3,4) of Closed Drag Chain Conveyors installed** in place of old open conveyors for transportation of lime in chemical recovery process. • **2 No's of New Bag filters for dust Extraction** installed in addition to existing 1 no of Bag Filters – **3 No's are in operation**. • New bucket elevator for transportation of lime to conveyers in place of old one to reduce dust. • Modification / relocation and additional ducting to collect fugitive lime dust from various areas to Bag Filters. • 145 no's of Water Sprinklers PROVIDED roads and various locations as per directed by APPCB.

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4	The industry shall install web cameras at outlet of ETP and connect to APPCB & CPCB website.	**Complied with** Web Camera installed at outlet of ETP treated water and is connected with APPCB & CPCB for monitoring.
5	The industry shall explore the possibility of providing dedicated draining facility to discharge the treated effluent of paper mill directly into sea, instead of storing in the lagoons at Turpulanka sand shoals of Godavari river	The status is sufficiently explained in detail in the above table.
6	The industry shall operate NCG system continuously to reduce smell nuisance mainly in winter season.	**Complied with** The status has been sufficiently explained in the above paragraphs pertaining to odour management
7	The industry shall comply all the directions issued by the board vide order dated 21.06.2016.	**Complied with** **Compliance Status is attached under ANNEXURE 25**
8	The industry shall ensure continuous compliance of the conditions stipulated in the CFO and HWA order obtained from the board.	Half year Compliance Status of CFO and HWA is being submitting to APPCB.

As can be seen from the above table, this Respondent has duly and promptly complied with the above directions issued by the APPCB, and the allegations of violations as claimed by the Applicants are totally false and frivolous.

20. This Respondent submits that the committee of the APPCB officials visited the 7th Respondent plant on 30.03.2017 on a randomized risk based inspection which is a routine exercise carried out by the APPCB

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on a regular basis. Pursuant to this inspection, the APPCB on 19.09.2017, recommended to issue certain directions to be complied by this Respondent. The compliance report is filed herewith as **ANNEXURE-26**. These directions have also been promptly complied with by this Respondent and the status of the same is set out in the tabular column below:

S.No	Direction conditions	Compliance Status
1.	The industry shall restrict the temperature of waste water to below 35°C at inlet of ETP. The plan of action to restrict the temperature of waste water at inlet ETP within 2 months shall be furnished to RO Kakinada and ZO Visakhapatnam	**Current Status** : Existing Cooling Tower is being renovated 100% which includes strengthening of civil infrastructure and replacement with enhanced engineering equipment i.e. internals, drip eliminators, Gear box, fan wings to meet < 35 Deg.c temperature of the effluent outlet which will be fed to Aeration tank. Estimated Cost: Rs.73.714 Lacs. Civil mechanical works have been completed and was commissioned in the 3rd week of August, 2023. Earlier to this action plan, Andhra Paper initiated below actions and completed : 1) <u>Refurbishment of Cooling Tower</u> – Compliance update submitted to PCB on 29.07.2019. • Replaced existing internals with new • New Fan Gear box installed • New FRP Fan wings installed • Structural Beams strengthened • Effluent distribution spray nozzles replaced with new in order to have more surface area contact and increased heat transfer. **<u>However Some technical data on effluent temperature is given below :</u>** **<u>1) CPPRI Assessment Study</u>** Engaged "Central Pulp and Paper Research Institute" Saharanpur, Uttar Pradesh (U.P), which is a nodal institution under Ministry of Commerce & Industry, Govt. Of India,

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<table>
<tr><td></td><td></td><td>for "Assessment of Adequacy and Performance Evaluation of Existing Effluent Treatment (ETP)". Cooling tower and Aeration tank biological processes have been found adequate.

<u>2) Bacterial temperatures ref. METCAFF & EDDY publication – Waste Water Engineering</u>
<table>
<tr><td>Type of Bacteria</td><td>Temp. range for best function</td><td>Optimum range of temperature</td></tr>
<tr><td>Psychrophilic</td><td>10-30 deg.c</td><td>12-18 deg.c</td></tr>
<tr><td>Mesophilic</td><td>20-50 deg.c</td><td>25-40 deg.c</td></tr>
<tr><td>Thermophilic</td><td>35-75 deg.c</td><td>55-65 deg.c</td></tr>
</table>
Mesophilic type of bacteria, which is predominant in activated sludge processes for decomposition of organics present in the waste wasters. Growth rates double with approximately every 10 deg.c increase in temperatures up to Optimum.</td></tr>
<tr><td>2.</td><td>The industry shall implement recommendation of NEERI to operate ETP to achieve prescribed discharge standards. Further they shall furnish implementation progress of NEERI recommendations for operation of ETP to RO, Kakinada and ZO, Visakhapatnam every month along with consolidated data on power consumption for operation of ETP, waste water generated, treated and disposed for streams wise.</td><td>Complied with

All the recommendations of NEERI are being implemented and are being followed for reliable operation of ETP.</td></tr>
<tr><td>3.</td><td>The industry shall</td><td>M/s. CII- Triveni Water Institute</td></tr>
</table>

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	expedite plan of action to establish alternative disposal mode of treated waste water along with sewage of Rajamahendravaram. The recommendations of the feasibility study carried out in consultation with M/s. CII Triveni Water Institute, New Delhi shall be taken up with RMC and District administration to prepare joint action plan. They shall obtain CFE from the Board prior to establishment of alternative disposal mode of treated waste water / change of present disposal mode. The progress shall be reported to RO Kakinada and ZO Visakhapatnam regularly.	**completed** "Feasibility study for Exploring the alternative options for effluent discharge" **on 20.01.2017** and the same was **submitted to APPCB on 22.04.2017.** Chronological events and current status as explained in above paragraphs and **ANNEXURE-16**
4.	The industry shall regularly monitor odor at Mallayapeta, main entrance gate, near ETP and in the surrounding villages. They shall expedite plan of action presented during EAC (TF) meeting held on 10.08.2017 to mitigate odor nuisance in the surroundings and they shall contain odor at source of generation.	**Complied with** **1) Conducting monthly testing for Hydrogen sulfide**, Methyl Mercaptan & Dimethyl Disulphide in **twenty (20) locations of Rajahmundry city** and the readings are **well within Standards as per US ACGIH & UK NIOSH**. The same reports are being submitted to APPCB. **2) Action plans presented in EAC (TF) on 10.08.2017 and Status:** Engaged M/s. Lundberg – USA for evaluation of odor control systems and to suggest best technologies / alternatives. The following action plans derived to address the odor issue: • Installation of Hard Piping System for collection and treatment of Foul streams with H2O2 treatment.
5.	The industry has to upgrade the NCG system and to operate the same continuously to mitigate smell nuisance	

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		• Up gradation of existing LVHC NCG Incineration System • Up gradation of existing HVLC NCG Incineration System All above projects have **been installed, commissioned and are in operation** and the update submitted to APPCB on 22.12.2018. **Total Project cost: Rs.11.64 crores** The same is explained in detail in previous sections.
6.	The industry shall implement adequate dust containment cum extraction measures near lime kiln 1 & 2 to mitigate fugitive emission and shall report compliance to RO, Kakinada and ZO, Visakhapatnam within one month.	**Complied with** The following dust control measures / systems installed and commissioned @ Project cost of : Rs.2.84 Cores • **Total 5 Nos. (DCC.1,1.A,2,3,4) of Closed Drag Chain Conveyors installed** in place of old open conveyors for transportation of lime in chemical recovery process. • **2 Nos. of New Bag filters for dust Extraction** installed in addition to existing 1 no of Bag Filters – **3 No's are in operation**. • New bucket elevator for transportation of lime to conveyers in place of old one to reduce dust. • Modification / relocation and additional ducting to collect fugitive lime dust from various areas to Bag Filters provided. • 145 No's of Water Sprinklers installed as per APPCB directions.
7.	The Industry shall expedite to furnish lease agreement for transit storage of treated waste water at Thurupulanka from competent authorities. The progress shall be reported by RO, Kakinada and ZO, Visakhapatnam within 15 days.	1) **1999-2009 & further 33 years Recommended on 14.08.2014:** The Chief Commissioner of Land Administration & Special Chief Secretary to Govt. Of A. P recommended Turupulanka Island lease renewal from 1999 to till 2009 and for a further period of 33 years and forwarded recommendation to Government on 14.08.2014 **(ANNEXURE – 17)** for further action.

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		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 (ANNEXURE – 18)** subject to 10% of present market value as lease amount with provision for enhancement of lease amount in a block period of 5 years. 3) District Collector, East Godavari communicated vide ref.E1/495/2016, dated 04.2016 **(ANNEXURE – 19)**, 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.** 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 so as to submit report to DRO & District Collector to move on land lease. The Tahsildar has also requested the 7th Respondent to make arrangements for their survey team to conduct the survey of the Turupulanka land **(ANNEXURE-20)** vide letter dated 18.03.2023. This has also been duly obliged by this Respondent. 5) Even recently, during a personal hearing on 25.07.2023, the APPCB directed the 7th Respondent to pursue the issue of lease renewal with the District Collector, and pursuant to the same, this Respondent has issued a letter dated 29.07.2023 to the District Collector, East Godavari District

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		(**ANNEXURE-21**) requesting him to renew the lease. This Respondent is awaiting response from the District Administration.
8.	The Industry shall dispose the solid waste generated from process & ETP in environmental sound manner. The details of solid waste generation for stream wise and disposal mode shall be reported to RO, Kakinada and ZO, Visakhapatnam for every 3 months.	**Complied with** 1) Solid waste generated from processes and ETP are being disposed to authorized end users as per Hazardous waste Authorization. 2) Statement in tabular form with details of various waste generated and disposed with quantities are being submitting to APPCB on monthly basis.
9.	The industry shall comply all the directions issued by the board vide order dated 27.07.2015, 21.06.2016 and 30.01.2017	Compliance status of various orders are attached under **ANNEXURES-27 (27.07.2015)** **ANNEXURE-25 (21.06.2016)** **ANNEXURE-24 (30.01.2017)**
10.	The Industry shall ensure continuous compliance of the conditions stipulated in the CFO and HWA order obtained from the board.	Half year Compliance Status of CFO and HWA is being submitting to PCB.

NEERI recommendations for operation of ETP

Recommendations	Compliance Status
Ensure proper and optimum conditions as per the designed specifications and manufacturer's instructions.	Complied with Being followed all the conditions and parameters in line with design specifications and instructions.
Avoid fluctuation in effluent flow and pollution load so as reduce the shock load to biomass and the system as a whole.	Complied with Constant flow & load is being maintained, there is no much variations as the manufacturing operations are constant and continues operational mode. **Average flows are being maintained at 1250 KL/ hr.**
Ensure Proper addition of	Complied With

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nutrients.	Required nutrients are being fed to aeration system to supplement Nitrogen and Phosphorus. Chemical consumption records are available and are relevant log sheets are maintained on daily basis.
Maintain required MLSS / MLVSS concentration during biological treatment.	Complied With Day to day sampling and monitoring is being done & records are being maintained. **An average of 4000 - 5000 mg/lt MLSS, which is the best range for performance for extended type of aeration system.**
Maintain Desired level of DO in the aeration tank	Complied with Desired level of Dissolved Oxygen is being maintained in aeration tanks. Day to day sampling and monitoring is being done.
Ensure periodic and timely withdrawal of sludge from the clarifiers.	Complied with An average of **500 KL/ day secondary sludge** is being removed from the system. Primary sludge is being removed from time to time without accumulation in the bottom of primary clarifiers. Related records are maintained.
Proper maintenance of electric motors and pumps etc..	Complied with Engineering team attends regular maintenance, repairs and preventive maintenance. Overhauling of equipment is being done on regular basis. Repairs and maintenance works are attended as per ETP requirements. Dedicated Mechanical & Electrical Managers with crew are available for ETP operations. **Standby equipment in place**.
Regular monitoring of ETP, Upstream and downstream of river Godavari should be carried out with respect to secondary treatment and treated discharge from land treatment system.	Complied with ETP performance is monitored on daily basis at our laboratory. NABL approved third party carries once in a month for **ETP sampling and testing**. Once in quarter, Upstream and downstream of **river Godavari sampling** and testing is being done by NABL approved third party and **reports are being submitted to APPCB.**

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21. This Respondent ardently denies the allegations made in paragraphs 9 and of the Application as false and baseless. This respondent is being continuously monitored by the APPCB on real time live tracking of the pollution parameters through the systems implemented at the 7th Respondent's Plant. This Respondent is being routinely inspected by the APPCB officials and additional directions that are given for better mitigation of pollution are being scrupulously complied with by this Respondent on an immediate basis.

22. This Respondent submits that the photographs submitted by the Applicants of the smoke emission and the Godavari river, are once again misleading and manipulative. This respondent is taking utmost care and has installed state-of-art technologies and facilities for the purpose of achieving the best ETP mechanism available in the industry and for upholding the environmental sustainability of the production process. All the above stated facts and documents furnished with this reply statement will unequivocally establish the fact that there is no adverse impact on river water quality due to the operations of this Respondent and that the pollution mitigation measures adopted by this Respondent are environmentally sustainable. Infact, the Assessment of Adequacy and performance evaluation of the existing ETP undertaken by Central Pulp and Paper Research Institute (CPPRI) on December 2019 clearly states that on analysis of the samples collected by the CPPRI, the performance of the ETP installed by this Respondent is satisfactory. The copy of report is furnished herewith as **ANNEXURE – 28.**

23. The allegations contained in paragraph 11 of the Application are denied by this Respondent as false and vexatious. The matter of fact is that on 04.10.2022, a huge gathering of people from Kotilingalapeta gathered at river water intake pump house of this Respondent at Godavari Bund, on the instigation of certain vested interests. They stopped the pumping station by forcibly entering into this Respondent's premises. As a result this Respondent's operations was put to a dangerous risk due to insufficient or lack of water supplies to the running high Boiler and other continues process operations. Therefore this Respondent took a decision to safely shut down of its

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operations to avoid any potential mishap. About 5 persons who lead this gathering are affiliated to various political parties.

24. One among them, J.B.Giridhar is a History Sheeter having 8 criminal cases pending against him at the local police station. He has been categorized as a "Rowdy" by the police. According to the report dated 22.04.2022 sent by the Superintendent of Police, East Godavari District to the Director, National Commission for Scheduled Castes, it can be seen that he is in the practice of lodging false complaints against this Respondent's management alleging discrimination against Scheduled Caste Employees. In this report, it is stated that he has mislead the legal and investigation agencies with a dishonest intention of getting personal favours and benefits illegally, and that his character and attitude has already been proved as untrustworthy. This report will go to show that the gathering lead by the aforesaid said persons, is purely motivated with an ulterior motive to get their personal favours done. This Report of the SP, East Godavari is filed herewith as **ANNEXURE-29.**

25. A Police complaint was lodged by this Respondent in respect of this incident. A copy of this Police complaint is filed herewith as **ANNEXURE-30**. When this Respondent's representatives went to spot with support of government officials and Police to resolve the issue, the agitating people demanded additional jobs and CSR activities to be done for their locality. In order to diffuse the situation, this Respondent's representatives gave an assurance letter to schedule a meeting with top management to discuss the demands made by the agitated group of people. It is necessary here to clarify that no commitment to accept the demands made by the agitators was given by this Respondent and the same is amply clear from the letter. A copy of this letter issued by this Respondent's representatives is filed herewith as **ANNEXURE 31**.

26. As promised under the letter dated 04.10.2022 a meeting was held by the management of this Respondent on 15.10.2022 with the 5 persons who lead the gathering. Pursuant to the demand of these people, this Respondent has agreed to organize medical camps twice a year to the local Kotilingapeta people, to provide nominally required medicines, to extend the existing drinking water facilities to 7 streets

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of Kotilingapeta, to impart skill development programs to local women, to consider local women for employment on contract basis. In addition to these commitments, this Respondent reiterates that they have been undertaking numerous CSR initiatives bringing about a positive change to the lives of the people living nearby. In the financial year 2022-23 alone this Respondent has spent Rs.304.5 Lacs against its CSR obligation of Rs. 279.4 lacs, thereby spending an excess of about Rs.24.7 lacs. However, notwithstanding the same, this Respondent is committed to further CSR initiatives to contribute to the society.

27. This Respondent submits that in view of the above facts and submissions, it is amply clear that the grounds raised by the Applicants in the above OA seeking to close down this Respondent unit is absolutely, false, baseless, frivolous and bereft of any factual or legal merit. This Respondent further reiterates that it has adopted and implemented numerous state-of-the-art technologies and facilities at their plant to achieve an environmentally sustainable production process not only at present but also to maintain the same even in the future. This respondent has been a pioneer in implementing the first in the industry processes and technologies that contributes towards its sustainable manufacturing process. This respondent, over the years has voluntarily implemented many systems and practices that is in addition to the directions given by the APPCB and the MOEF for operating the industry.

28. The operations of this Respondent are strictly in compliance with all the applicable Laws, Rules, the Consents, ECs and other directions issued by the Authorities, and the very fact that the APPCB and the MOEFCC have been granting and renewing all the required statutory consents to this respondent goes to establish the fact that this Respondent has fully complied with all the directions issued to them. These directions issued and compliances made clearly shows that this respondent is being continuously monitored by the 3rd and 4th Respondents for all the environmental and pollution control measures.

29. This Respondent submits that they are also filing periodical compliance reports to the 3rd Respondent CPCB with regard to the

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conditions stipulated under its EC and the CFO granted to this Respondent. The latest compliance report submitted to the CPCB in respect of the EC for the period October 2022 to March 2023 is filed herewith as **ANNEXURE 32**. The latest compliance report submitted to the CPD in respect of the CFO for the period January 2023 to June 2023 is filed herewith as **ANNEXURE 33**.

30. This Respondent submits that it is highly committed to values such as respect for people, communities, cultures and environment. Their CSR activities promote environmentally and socially responsible business practices by assessing and mitigating the environmental and social impacts on sustainable economic growth. The 7th Respondent through its CSR initiatives promotes literacy by developing, assisting and supporting educational institutions in order to impart quality education. It also has greater contribution to the society by promoting traditional and new learning skills in formal & non formal institutions, imparting training and education in all areas including scientific, cultural, traditional and ethnic art & craft.

31. This Respondent submits that the Applicants, being fully aware of the due compliances by this Respondent is deliberately to mulcting false allegations. The above application lacks merits as this respondent is carrying on paper and pulp manufacturing operations and other allied activities in strict compliance with the prescribed procedures and directions issued from time to time by the authorities. The operation of this Respondent has not caused any pollution, whatsoever as alleged by the Applicants.

32. The 7th Respondent submits that the above application is bereft of any factual or legal merit, and has misrepresented various material particulars that are germane to this issue. The Applicants are attempting to use this Hon'ble Tribunal as a means to settle scores with this Respondent. Therefore, the Applicants deserves no indulgence from this Hon'ble Tribunal and the Application is liable to be dismissed with costs.

33. In the light of the above submissions and the supporting documents furnished this Respondent therefore humbly prays that this Hon'ble

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& Mill Manager

Tribunal may be pleased to dismiss the above application as bereft of any merit and thus render justice.

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 33 have been explained to me and are affirmed to be true to the best of my knowledge, belief and information.

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

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