

**BEFORE THE NATIONAL GREEN TRIBUNAL  
SOUTHERN ZONE, CHENNAI**

**APPEAL No. 40 OF 2022 (SZ)**

**IN THE MATTER OF:**

Kunal Munindar Narender Goud  
and Others.

....

Appellants

Versus

Union of India  
and Others

....

Respondents

**REPLY OF THE TELANGANA STATE POLLUTION CONTROL BOARD (R2)**

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**Place:** Hyderabad.

**Date:** 28-01-2023.



(1)  
**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL SOUTHERN  
ZONE, CHENNAI**

**Appeal No. 40 of 2022**

Kunal Munindar Narendar Goud  
& ors

...Appellants

-Vs-

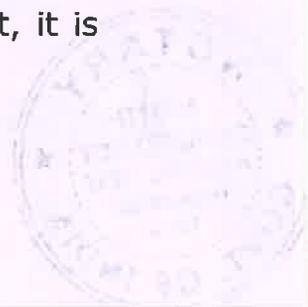
Union of India  
& ors

...Respondents

**REPLY FILED BY THE SECOND RESPONDENT**

The Second Respondent- Telangana State Pollution Control Board states as follows:

1. The Second Respondent denies all the averments, allegations and statements contained in the Appeal excepting those specifically admitted herein as false and incorrect.
2. The above appeal has been preferred as against the Environmental Clearance dated 03.01.2022 granted by the first respondent to the fourth respondent for setting up Grain based Distillery capacity 600 KLPD (1X400 KLPD & 1X200 KLPD) with 15 MW Co-generation Power located at Chittanur Village, Marikal Mandal, Narayanmpet District, Telangana.
3. It is respectfully submitted that, the first respondent had issued clearance to the fourth respondent under B2 Category as per the MoEF& CC Notification S.O. 2339 (E), dated 16<sup>th</sup> June, 2021, wherein a special provision was made in the EIA Notification, 2006 (Schedule 5 (ga), Category B2) through which for all applications for Grain based distilleries with Zero Liquid Discharge producing Ethanol which is to be solely used for Ethanol Blended Petrol Programme of the Government of India shall be considered as B2 Category and the same is appraised at Central Level by Expert Appraisal Committee (EAC) with condition that it shall be only be used for fuel ethanol manufacturing (EBP Programme) as per self-certification in form of an affidavit by the Project Proponent.
4. It is respectfully submitted that, as the project falls under B2 Category as per the Notification dated 16.06.2021 of the first respondent, it is



(2)

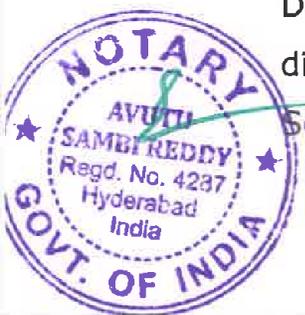
pertinent to note that the Standard ToR and the Public consultation is not applicable. Hence, there is no violation of EIA Notification as alleged by the Appellants.

5. It is respectfully submitted that, as far this respondent is concerned, the fourth respondent applied for CFE before this respondent. While applying for CFE, the Industry has shown the total area as 32.6 acres (1,29,499.52 Sq. Mtrs. as per the TS-iPASS application) and Total Built up area as 76,890.00 Sq. Mtrs (as per the TS-iPASS application).The CFE verification report was forwarded to the Board office on 18.01.2022 as such the respondent Board issued CFE to the fourth respondent by order dated 29.01.2022 for the below mentioned products and production quantity:

S. No.	Product Details	Production quantity
Product		
1	Ethanol	600 KLD
2	Power	15 MW
By product		
1	DDGS	330 TPD
2	CO <sub>2</sub>	340 TPD

6. It is respectfully submitted that, as per the EC, the total water requirement is 2700 m<sup>3</sup>/day will be met from Kolisagar Lift Irrigation Scheme. Effluent of 4240 m<sup>3</sup>/day quantity will be treated quantity will be treated through MEE and Condensate Polishing unit and the plant will be based on Zero Liquid discharge system. As such the respondent board issued CFE for total water consumption of 240 KLD from Kolisagar lift irrigation scheme, out of which, for Process – 1020 KLD, Soft water for Distillation, Cooling Tower make up – 820 KLD, DM water for Boiler makeup & Distillation – 835 KLD and Domestic – 25 KLD as per CFE application filed by the project.

7. It is submitted that, the fourth respondent generates wastewater of about 4710 KLD out which, from spent wash – 3540 KLD, Spent Lees – 700 KLD, Cooling Tower bleed off & Boiler blow down – 450 KLD and Domestic – 20 KLD. The fourth respondent has proposed to treat and dispose Non process Effluents as "Backwash from DM plant and Softener, Boiler blow down neutralized in neutralization tank and will



(3)

be mixed with cooling tower blow down in CMB and will be utilized for greenbelt development, dust suppression and ash conditioning. The scrubbed water CO<sub>2</sub> recovery plant is utilized in the Fermentation section". Further the Industry proposed to install Coal / Bio mass / Briquette fired boiler of capacity 100 TPH with ESP followed by stack of 83 m height for dispersion of the boiler emissions and DG Set of capacity 2 x 500 KVA with acoustic enclosures.

8. It is further submitted that, the unit generates solid/ hazardous waste viz., waste oil – 500 LPA and proposed to dispose to authorized Re-processors / Recycling units, DDGS - 330 Tons/day proposed to dispose as Cattle feed / Fish Feed / Prawns Feed and Ash – 220 Tons/day proposed to utilize in Brick manufacturing unit. It is submitted that as per the CFE order, the board has directed the fourth respondent not to store ash openly and shall store in silo only. The copy of the CFE issued to the fourth respondent is filed as **ANNEXURE-1.**

9. This respondent therefore prays that such appropriate orders may be passed by this Hon'ble Tribunal and thus render justice.

Dated at Hyderabad on this the Twenty Eighth day January, 2023

Counsel for 2<sup>nd</sup> Respondent

2<sup>nd</sup> Respondent

**VERIFICATION**

**ENVIRONMENTAL ENGINEER**  
Telangana State Pollution Control Board  
Regional Office, Hyderabad  
4th Floor, Podupu Bhavan,  
Hyderabad Collectorate Complex  
N.S. ROAD, HYDERABAD-500 001.

I, Dr. B. Sangeetha, the Environmental Engineer, Regional Office, Hyderabad of the Telangana State Pollution Control Board, the 2<sup>nd</sup> Respondent in the above Appeal do hereby verify that what are all stated above are true and correct to the best of my knowledge, information and belief.

Verified at Hyderabad on this the Twenty Eighth day of January, 2023



2<sup>nd</sup> Respondent  
**ENVIRONMENTAL ENGINEER**  
Telangana State Pollution Control Board  
Regional Office, Hyderabad  
4th Floor, Podupu Bhavan,  
Hyderabad Collectorate Complex  
N.S. ROAD, HYDERABAD-500 001.





**CONSENT ORDER FOR ESTABLISHMENT- RED CATEGORY**

**Order No. 02/TSPCB/CFE/NPT/RO-HYD/HO/2022**

**Dt.29.01.2022**

Sub:	TSPCB – CFE - M/s. Jurala Organic Farms and Agro Industries LLP Unit-1, Sy.No. 278/P,294/P,295/P,296/P, 297/P,298/P,307/P,308/P, Chittanur (V), Marikal (M), Narayanpet District – Application for CFE - Consent for Establishment of the Board under Sec.25 of Water (Prevention & Control of Pollution) Act, 1974 and Under Sec.21 of Air (Prevention & Control of Pollution) Act, 1981 - Issued - Reg.
Ref:	1) Environmental Clearance dt. 03.01.2022, issued by MoEF&CC. 2) Industry's application dt: 10.01.2022 (Application No. 3537990). 3) R.O's verification report dt. 18.01.2022. 4) CFE – CFO Committee meeting held on 20.01.2022. 5) Industry's Ir. dt. 21.01.2022.

1. M/s. Jurala Organic Farms and Agro Industries LLP Unit-1 obtained EC order vide reference 1<sup>st</sup> cited to establish grain based distillery to produce ethanol and establish captive power plant at Sy.No. 278/P, 294/P, 295/P,296/P, 297/P, 298/P, 307/P, 308/P, Chittanur (V), Marikal (M), Narayanpet District.
2. The industry, vide reference 2<sup>nd</sup> cited, submitted an application to the Board seeking Consent for Establishment (CFE) to produce following products with capacities as mentioned below, with project cost of Rs. 602.5 Crore, in an area of 32.6 Acres.

S.No	Products	Capacity
1.	Ethanol	600 KLD
2.	Coal / Bio-mass / Briquettes based Power plant	15 MW

**By products:**

S.No	By-Products	Quantity
1.	DDGS	330 TPD
2.	CO <sub>2</sub>	340 TPD

3. As per the application, the above activity is to be located at Sy.No. 278/P,294/P,295/P,296/P, 297/P,298/P, 307/P,308/P, Chittanur (V), Marikal (M), Narayanpet District.
4. The above site was inspected by the Asst. Environmental Engineer, Regional Office, Hyderabad, T.S. Pollution Control Board on 11.01.2022 and observed that the site is surrounded by:  
North: 18 m wide approach Road;  
South: 24 m wide approach Road followed by open lands;  
East: Open Land;  
West: Open Land.
5. The Board, after careful scrutiny of the application and additional information submitted by the industry, verification report of the Regional Officer, E.C. Order dated 03.01.2022 issued by MoEF&CC and after examining in the CFE-CFO Committee meeting held on 20.01.2022, hereby issues CONSENT FOR ESTABLISHMENT to your industry under Section 25 of Water (Prevention & Control of Pollution) Act, 1974 and under Section 21 of Air (Prevention & Control of Pollution) Act, 1981 and the rules made there under. This order is issued to the products and capacities as mentioned at Para (2) only.

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6. This Consent Order now issued is subject to the conditions mentioned in Schedule 'A' and Schedule 'B'.
7. This order is issued from pollution control point of view only. Zoning and other regulations are not considered.

Encl: Schedule 'A'  
Schedule 'B'

Sd/-  
MEMBER SECRETARY

To  
M/s. Jurala Organic Farms and Agro Industries LLP Unit-1,  
Sy.No. 278/P,294/P,295/P,296/P, 297/P,298/P, 307/P,308/P,  
Chittanur (V), Marikal (M), Narayanpet District.

// T.C.F.B.O.//

*V. S. Reddy*

Joint Chief Environmental Engineer

**SCHEDULE - A**

(6)

1. This order is valid for a period of 5 years from the date of issue. Progress on implementation of the project shall be reported to the concerned Regional Office, T.S. Pollution Control Board once in six months. The consent of the Board shall be exhibited in the factory premises at a conspicuous place for information of the inspecting officers.
2. The proponent shall obtain Consent for Operation (CFO) from TSPCB, as required Under Sec.25/26 of the Water (Prevention and Control of Pollution) Act, 1974 and under sec. 21/22 of the Air (Prevention and Control of Pollution) Act, 1981, before commencement of the activity.
3. The proponent shall ensure that there shall not be any change in the process technology and scope of working without prior approval from the Board.
4. The industry is liable to pay compensation for any environmental damage caused by it, as fixed by the Hon'ble Courts, Collector and District Magistrate as Civil liability.
5. The rules and regulations notified under Environmental Acts by the MOEF&CC and by the Ministry of Law and Justice, GOI, regarding the Public Liability Insurance Act, 1991 shall be followed.
6. Concealing the factual data or submission of false information / fabricated data and failure to comply with any of the conditions mentioned in this order may result in withdrawal of this order and attract action under the provisions of relevant pollution control Acts.
7. Notwithstanding anything contained in this consent order, the Board hereby reserves the right and powers under Section 27(2) of the Water (Prevention & Control of Pollution) Act, 1974 and under Section 21 of the Air (Prevention & Control of Pollution) Act, 1981 and amendments thereof, to review any and/or all the conditions imposed herein, to modify conditions or stipulate any further conditions and to take action including revocation of this order in the interest of public health and environment.
8. Any person aggrieved by an order made by the State Board under Section 25, Section 26, Section 27 of Water Act, 1974 or Section 21 of Air Act, 1981 may within thirty days from the date on which the order is communicated to him, prefer an appeal as per the State Water Rules, 1976 and Air Rules.1982, to such authority (hereinafter referred to as the Appellate Authority) constituted under Section 28 of Water (Prevention and Control of Pollution) Act, 1974 and Section 31 of the Air (Prevention and Control of Pollution) Act, 1981.

**SCHEDULE - B**

**Water:**

1. The source of water is Koilsagar lift irrigation scheme. The maximum total water consumption shall not exceed 2700 KLD. The industry shall comply with the following:

S. No.	Purpose	Quantity (KLD)
1.	Process	1020
2.	Soft water for distillation, Cooling tower Makeup	820
3.	DM Water for Boiler makeup & Distillation dilution	835
4.	Domestic	25
<b>Total</b>		<b>2700 KLD</b>

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2. The total fresh water requirement shall not exceed 2400 KLD (@ 4.0 KL/KL of ethanol production), as stipulated in the EC order.
3. Industry shall provide water storage pond of 60 days capacity and the accumulated water shall be used as fresh water thereby reducing fresh water consumption, as stipulated in the EC order.
4. The maximum Waste Water Generation (KLD) shall not exceed the following:

S. No	Source	Quantity (KLD)
1	Spent wash	3540
2	Spent Lees	700
3	CT & Boiler blow down	450
4	Domestic	20
Total		4710 KLD

5. Effluent Treatment & Disposal: Industry shall comply with the following:

S. No.	Description	Max Daily Discharge	Method of treatment & Point of Disposal
1	Spent wash,	3540 KLD	Spent wash through centrifuge decanters for separation of suspended solids and then treated in MEE followed by DWGS dryer to obtain DDGS.
2	Spent Lees	700 KLD	Spent Lees and MEE condensate are treated in CPU consisting of aeration, clarification, sand filtration and activated charcoal filtration followed by RO plant. RO permeate for reuse in process & cooling and RO rejects to MEE.
3	CT & Boiler blow down	450 KLD	Neutralized in a neutralization tank and will be mixed with cooling tower blow down in the CMB followed by RO plant. RO permeate for reuse in process & cooling and RO rejects to MEE.
4	Domestic	20 KLD	STP
Total		4710 KLD	

6. The industry shall provide MEE, Effluent Treatment Plant (ETP) consisting of Equalisation, Cooling & pH Adjustment, Nutrient dosing, Anaerobic Treatment, Degasification, Addition of Spent Leese and Dilute WW, Extended Aeration with diffused aeration, Secondary Clarifier, Pressure Sand Filter, Ozonation, Activated Carbon Filter followed by RO plant. The MEE, ETP and RO plant shall be constructed and commissioned along with the commissioning of the activity. All the units of the ETP shall be impervious to prevent ground water pollution. Industry shall install RO plant of capacity 3600 KLD as committed vide letter dt. 21.01.2022.
7. The industry shall treat and reuse the treated water within the factory and no waste or treated water shall be discharged outside the premises.
8. The industry shall provide separate water meters for recording water consumption for process, washings, boiler feed & utilities and domestic purposes and also maintain daily records.
9. The industry shall provide digital flow meters for recording the quantity effluent generation, quantity of treated effluents at ETP outlet, MEE feed & MEE condensate utilized for cooling tower makeup / plantation.

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10. The industry shall install IP camera with PAN, TILT Zoom, 5x or above focal length, with night vision capability at MEE as per CPCB norms and connect the data to the CPCB & TSPCB servers as stipulated in EC order.
11. The industry shall provide real time effluent quality monitoring system for outlet of ETP for the parameters: flow, pH, COD, BOD, TSS as per CPCB directions and connect the data to the CPCB & TSPCB servers as stipulated in EC order.
12. The industry shall maintain electronic data logging flow totalisers and maintain records of water consumption, spent wash generation, CO<sub>2</sub> generation. The above flow meter readings shall be integrated to PLC system. The consolidated records shall be submitted to the RO, every month.

**Air:**

13. The proponent shall comply with the following for controlling air pollution.

S. No	Source of air pollution	Control Equipment
i)	Coal / Biomass/ Briquettes fired boiler of capacity 100 TPH	ESP followed by stack of 83 m height
ii)	DG Sets of capacities – 2 x 500 KVA	Acoustic enclosures.

14. Industry shall install ESP for the boiler as stipulated in the EC order.
15. The industry shall install separate energy meters for recording energy consumption for APCE and maintain record for daily energy consumption.
16. The industry shall provide interlocking system to the APCE, so that in case of failure of APCE, the complete process shall be shut down.
17. A sampling port with removable dummy of not less than 15 cm diameter shall be provided in the stack at a distance of 8 times the diameter of the stack from the nearest constraint such as bends etc. A platform with suitable ladder shall be provided below 1 meter of sampling port to accommodate three persons with instruments. A 15 AMP 250 V plug point shall be provided on the platform.
18. The generators shall be installed in a closed area with a silencer and suitable noise absorption systems. The ambient noise level shall not exceed 75 dB(A) during day time and 70 dB(A) during night time.
19. Raw materials shall be stored in silos or in covered areas to prevent dust pollution and fugitive emissions. Industry shall provide closed sheds for storage of coal and husk.
20. Industry shall take following mitigation measures to control air pollution, as proposed:
  - Raw material/fuel unloading areas provided with dust suppression system.
  - All material transfer points provided with dust extraction system with bag filters.
  - All the conveyers covered with sheets to prevent the fly-off of fugitive dust.
  - All internal roads are made pucca to prevent the fugitive dust to vehicular movement.
  - No open storage of ash and the ash is being stored in silo only.
21. Industry shall install online stack monitoring system and connect the same to CPCB and SPCB servers as stipulated in EC order.

(9)

Solid Waste

22. The proponent shall comply with the following:

S. No.	Description	Quantity	Mode of Disposal
1.	Waste oil	500 LPA	Shall be sent to Authorized Re-processors / Recyclers.
2.	ETP sludge	≈16 kg/day	Shall be reused as manure.
3.	Ash	220 TPD	To Brick Manufacturing unit within the plant premises.

23. Industry shall install brick manufacturing unit within the plant premises for utilization of fly ash, as stipulated in the EC order.

24. The following rules and regulations notified by the MoEF&CC, GoI shall be implemented.

- Solid Waste Management Rules, 2016.
- Construction and Demolition Waste Management Rules, 2016.
- Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.
- The Plastic Waste Management Rules, 2016.
- Batteries (Management & Handling) Rules, 2001 and its Amendment Rules, 2010.
- E-Waste (Management) Rules, 2016 and its Amendment Rules, 2018.
- Bio-Medical Waste Management Rules, 2016 and its Amendment Rules, 2018.

Other Conditions:

- Greenbelt of atleast 5-10 m width shall be developed in nearly 33% of the total project area, mainly along the plant periphery, as stipulated in EC order.
- Industry shall utilize solar / wind power to meet atleast 10% of total power requirement. as stipulated in the EC order.
- Adequate measures should be taken to prevent odour problem from solid waste processing plant and STP.
- A separate Environment Management cell (having qualified person with Environmental Science / Environmental Engineering / specialization in the project area) equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring function.
- CO<sub>2</sub> generated from the process shall be bottled / made ice and utilized / sold to authorized vendors.
- The proponent shall comply with the provisions laid under Fly ash Notification No.S.O.763 (E), dt. 14.09.1999 and Amendments thereof.
- The proponent shall comply with all the directions issued by the Board from time to time.

Sd/-  
MEMBER SECRETARY

To  
M/s. Jurala Organic Farms and Agro Industries LLP Unit-1,  
Sy.No. 278/P,294/P,295/P,296/P, 297/P,298/P, 307/P,308/P,  
Chittanur (V), Marikal (M), Narayanpet District.

// T.C.F.B.O.//



Joint Chief Environmental Engineer