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**BEFORE HON'BLE NATIONAL GREEN TRIBUNAL WESTERN ZONE BENCH AT  
PUNE**

**Original Application No. 32 of 2023WZ.**

**Raju Alias Devavappa Anna Shetty & Others. .... } Applicant.**

**VERSUS**

**State of Maharashtra & Others. .... } Respondents.**

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COUNTER AFFIDAVIT TO THE COMPLIANCE-AFFIDAVIT FILED BY R.N.2 IN OA NO 32 OF 2023WZ  
BEFORE HON'BLE NATIONAL GREEN TRIBUNAL WESTERN ZONE BENCH AT  
PUNE

Original Application No. 32 of 2023WZ.

Raju Alias Devavappa Anna Shetty & Others. .... } Applicant.

VERSUS

State of Maharashtra & Others. .... } Respondents.

COUNTER AFFIDAVIT TO THE COMPLIANCE-AFFIDAVIT FILED BY R.N.2 IN OA NO 32 OF 2023WZ

I, Sharad Suresh More, General Manager of Shri Dutt India P Ltd, an Authorized Signatory of the Respondent No.1 is filing this Counter Affidavit to the Compliance-Affidavit filed by & on behalf the MPCB, i.e. the R.N.2 only with a limited purpose of bringing on record that the R.N.2 has not filed on record the exact period for which the violation was committed; the evidence with respect to violation has to be adduced along-with the pagination in order to facilitate this Tribunal to arrive on a conclusion. However, no specific date-wise violations given except reference of the Joint Committee Report & Certain communications like Visit Report followed by Proposed Directions & Other Communications without supported by JVS & Other Documentary Reports. The following are the submissions of the R.N.1.

1. In its Report submitted by the Joint Committee in compliance of the Order passed by this Hon'ble Tribunal dated 31<sup>st</sup> March 2023 has specifically observed that the during the joint committee inspection both of the sugar & distillery industries were not in operation i.e. Sugar industry due to non-crushing season and a distillery industry due to self-closure, after the incidence of pipeline breakage. (Joint Committee Report Conclusion – I) Last 3 Lines.

The Compliance-Affidavit of the MPCB in the Tabular Form mentions at Sr. No. 1 in column 2 at page-3 of the said Affidavit that the period of infringement is the Fishkill incident in Krishna River on 10-03-2023 & period of violation is 28-10-2022 to 14-03-2023 (Total-141 Days). In column-3 it gives evidence of violation from pages 37 to 40 of the Joint Committee Report & Conclusion at Pages-46 to 48. It also refers to the EDC-calculation report & subsequent personal hearing extended on 25-04-2024 by RO, MPCB, and Kolhapur. (Page-269). The R.No.1 attended personal hearing and submitted its prayer for reconsideration of EDC. A copy of the said request submitted in writing is enclosed and marked as an Annexure - A.



The other documents referred as an evidence are MPCB-Visit Report dated 10-03-2023, Proposed Directions dated 10-03-2023, Closure Directions dated 13-03-2023 & Conditional Directions to Re-start the Sugar-Industry dated 04-10-2023. The following are the submissions about the MPCB-Tabular Form period of Violations, Days of Violations and Documentary Evidence.

- 1.1) R.N.1 has already filed a detailed objection to the Reply filed by the MPCB dated 16-02-2024 for imposition of EDC without following the principles of natural justice. It is specifically pointed out that the R.N.1 does not have any provision or arrangement for discharge of treated or untreated effluent outside its disposal area or into environment nor it has done it intentionally. There was no untoward effect on the crops due to disposal, which on the contrary resulted into increase in the yield. It was specifically drawn attention to the factual position of discharge of untreated effluent by the adjoining distillery. (Page 1 to 3 of Objections filed to the MPCB- Affidavit dated 16-02-2024.)
- 1.2) In its Counter-Reply dated 18-05-2024 submitted to the MPCB-Compliance affidavit dated 09-05-2024 at pages-444 at Para-7 (II), (III) & (IV) pointed out that it 100% utilize its sugar-treated effluent after achieving standards for 120 acres of land for irrigation & the crops are found very much in good yield conditions. More particularly it does not generate any yellow colored effluent. Hence it was not correct on the part of R.N.2 to assess any EDC against R.N.1. The R.N.2 has not at all shown any date-wise specific violations duly supported by the substantial documentary evidence like JVS Reports, days of specific violations except visual observations in the visit report & notices issued by it, which are already replied with the compliance report & therefore further restart permissions with the Consent Renewal granted after verification of compliances.
- 1.3) The Compliance-Affidavit simply gives the Days of Violations from 28-10-2022 to 14-03-2023 (Total-141 Days) i.e. the total days for which the Sugar-Industry had been operated without giving specific violation on each day of operation of the sugar factory. It further mentions that the evidence of violation from pages 37 to 40 of the Joint Committee Report & Conclusion at Pages-46 to 48.

However, after perusal of the pages 37 to 40 of the Joint Committee, it has been observed that the pages 37 to 40 are the terms & conditions for compliance of Water Pollution Control (Page-37), Details of BGs. (38), and General Conditions (39 & 40) Conclusions of



*Handwritten signature in blue ink.*

the Joint Committee are at Pages 16 to 20 of the Report. The comments of the R.N.1 on the said conclusions are as below:

- A) It is stated that both the Sugar & Distillery were not in operation at the time of inspection of Joint Committee. [Para-6-I-Conclusions.]
- B) It is also observed that the Distillery started its Trial production activities w. e. f. 22-02-2023 & continued up to 05-03-2023. It is specifically reported that total spent wash generation was 21 lacs liters i. e. 2100 CMD & on 01-03-2023 reportedly ruptured in few of joints of raw spent wash conveyance pipeline (RCC) leading to 5 days raw spent wash storage lagoon. After rectification the Distillery activities completely stopped on 06-03-2023. [Para-6: Conclusions-ii- sub-para-1- Page-16 of 22].
- C) More particularly it is noted that as a result of rupture in spent wash conveyance pipeline, about 21 lacs liters i.e. 2100 CMD of raw spent wash flown into adjacent drain of the sugar industry, which is meant for conveyance of excess condensate water into 15 days treated storage lagoon no 2 (unlined) which already had about 10,000 CMD of excess process condensate water & treated effluent from ETP of Sugar- Industry. Therefore, later on the Sugar-industry started pumping the said effluent into final lift irrigation sump through mixing chamber of ETP for discharge into on land for irrigation (Rusulwadi -Sambarwadi Irrigation Scheme-22 ha land) [Para-6: Conclusions-ii- sub-para-2 – Page- 16 of 22].
- D) It was also observed that at the time of visit the RCC-pipeline meant for conveyance of said effluent had ruptured (reportedly) & flown into adjacent natural drain, carrying untreated domestic sewage from the nearby settlements, which confluences with Madhavnagar nalla & sherin nalla and ultimately Krishna River, for which the R.N.4 -Distillery is responsible. [Para-6: Conclusions-ii- sub-para-2 – Page- 17 of 22].
- E) The JC Report further noted that as per the MPCB-Monitoring done on the date of incidence, the said effluent stream from the final lift irrigation sump of sugar factory was having pH- 5, SS- 154mg/l, TDS- 2208, BOD- 1400mg/l & COD- 6780mg/l respectively. More particularly, it was specifically noted that the mixed streams of wastewater [raw spent wash (it is definitely of distillery), process condensate water (sugar effluent) & untreated domestic sewage (from the nearby settlements- Para- 1 of page- 17 of 22 of the Report)] at natural drain i.e. downstream location of sugar & distillery industry was having concentration of pH 5.6, SS-187 mg/l,



*Aditi V. More*

TDS 2014 mg/l, BOD 1200 mg/l & COD 5648 mg/l respectively. It is further mentioned in the report of JC that the concentration of Ph, SS, TDS, BOD & COD were exceeding before confluence with the Krishna River. In all these exceeding concentration Respondent-Distillery overflow was responsible. [Para-6: Conclusions-iii- sub-para-2 – Page- 17 of 22].

- F) The Report again concludes that the raw spent wash (it is definitely of distillery), process condensate water (sugar effluent) & untreated domestic sewage (from the nearby settlements-Para- 1 of page-17 of 22 of the Report) mixed into K.T. weir (Sangali K. T. weir) of Krishna River resulted into sudden depletion of oxygen due to less volume of water. [Para-6: Conclusions-iv- sub-para-1 – Page- 18 of 22] In all these exceeding concentration Respondent-Distillery overflow was responsible.
- G) The Fisheries Commissioner Report however does not specifically state that the Fishkill was due to discharge of Sugar effluent. The sudden change of temperature can be remote cause but it cannot be attributed to the mixed discharge of process condensate water. The sugar industry & its disposal arrangements at Rusulwadi & Sambar wadi is at a distance of 14 km (upstream/downstream) which never goes to nearby nallas & then to Krishna River.[Para-6: Conclusions-v- sub-para-2 – Page- 18 of 22].
- H) The Report further observed that the Sugar factory has not provided system for management of process condensate water as it is not stipulated in the Consent to Operate. It is suggested that such a condition should be imposed. The objection is taken to proportionating its treated effluent with fresh water. The R.N.1 is ready to comply with whatever specific condition is imposed in respect to irrigation, but it does not cause any stream pollution on account of 100% utilized on land for irrigation purpose without causing any adverse effect on crops. [Para-6: Conclusions-viii- sub-para-2 – Page- 20 of 22].

2. EDC Calculation Report and Personal Hearing extended by Regional Officer, Kolhapur on 25.04.2024 through video conferencing in compliance to the Affidavit dated 09.05.2024 filed before Hon'ble Tribunal. However, in the said compliance affidavit in spite of specific Order passed by this Hon'ble Tribunal dated 06.09.2024, this Hon'ble Tribunal enquired from the learned counsel for R.No.2- MPCB as to where is the proof to prove that during the entire season, the respondent No.1 was in violation, nothing could be shown by him on record.



But the Advocate of R.No.2 stated that there were several inspections conducted during these periods and several test reports of these periods are also there on record to prove that the respondent No.1 was in violation. But nothing could be shown by him at that stage.

Therefore, the R.No.2- MPCB was directed to submit the said details in a tabular form showing therein the name of the respondent, and to show the period for which the violation was committed; and the evidence with respect to violation has to be adduced along-with the pagination in order to facilitate this Tribunal to arrive on a conclusion. However, during the course of hearing, nothing was shown in respect to the period of violation and documentary evidence about all 141 days i.e. date-wise violations except visit report dated 10.03.2023, proposed directions dated 10.03.2023, closure direction dated 13.03.2023 etc. After closure taking into consideration steps taken by the R.No.1 to comply with the points raised in the Joint Committee Report and MPCB-Directions, Conditional direction to restart Sugar Industry has been issued on 04.10.2023. During the said period, Sugar Industry was not in operation. Therefore, at the most these documents only show the specific violation of date 10.03.2023 and no other dates' violation.

The R.No.2 in his affidavit of January 2025 has enclosed the Online Continuous Effluent Quality Monitoring Report (OCEM) of the R.No.1 from 28.10.2022 to 10.03.2023 (141 days- Page 442). However, after going through the Compliance-Affidavit filed by the MPCB-R.N.2 at Pages 465-466, it has been observed that actual monitoring reports are available only for 23 days for BOD, COD, and TSS etc. and not for 141 days for which EDC has been assessed. Here also no exceeding results have been shown in clear-cut terms with respect to the prescribed standards in the consent to Operate for BOD- 100mg/l, COD- 250mg/l, SS- 100mg/l, TDS- 2100mg/l and pH- 5.5-9.0. Therefore, it is highly objectionable to assess EDC for total 141 days. It is therefore necessary to re-assess EDC only with reference to the specific violation date, like 10.03.2023 when the violation was pointed out in the visit report.

In view of above, the R.No.2 has failed to show the specific violations on each day of 141 days for which period, the R.No.1 was in operation and therefore entitled for review of the assessment of EDC as per actual days of violations as stated above.

Solemnly affirmed on 21<sup>th</sup> February 2025 at Sangli, Miraj.



VERIFICATION

I, Sharad Suresh More state that the contents paragraphs 1 & 2 of my Counter-Affidavit are true & correct to the best of my knowledge & belief. Annexure thereto is true office copy which was submitted to the MPCB.

(Sharad Suresh More)  
Authorized Sign

NOTARIAL REGISTER

Vol.No.001...Page No..6..

Sr.No.....1.....Date..21..2.. 2025

शुभ सुभा

BEFORE ME

Adv. Aditi Vikram More  
Advocate and Notary Govt.of India  
Shiroi, Tal. Shiroi, Dist. Kolhapur.  
Reg.No. 30231

21 FEB 2025





# Shri Dutt India Private Limited

(Operator of Vasantdada S.S.S.K. Ltd. Sangli)

Madhavnagar Road, Sangli - 416416. Tel. No. 9112688888, 9112788888

Ref.No. SDIPL/ETP/05/2024-25

Date- 29.04.2024

To,

**THE SUB REGIONAL OFFICER,**

Maharashtra Pollution Control Board,  
Sangli.

**Sub: -Hearing for Punitive action/damages in your office on 25.4.2024**

**Environmental management approach of SHRI DUTT INDIA PVT. LTD**

**(Operator of Vasantdada S.S.K. Ltd. Sangli)**

Respected Sir,

This is with reference to the above mentioned subject and your reference cited above. We would like to respectfully submit the following for your kind consideration: ---

- 1) SHRI DUTT INDIA PVT.LTD. is an industrial group, having establishments in Agro Industrial Sector. The group has Sugar Producing units, and as allied industry Ethanol Manufacturing, which contributes to limit foreign exchange spending of our country, by substituting crude oil import.
- 2) The group is presently running the Sugar Factory division of Vasantdada S.S.K. Ltd as '**OPERATOR**' to ensure due price to their member farmers.
- 3) Alongwith working of the production unit, equal attention is given to Environmental sembalance, and the group has ensured this by providing full fledged Effluent Treatment Plant comprising of Primary, Secondary, and Tertiary Treatment and scrupulously operating the same with vigil. We have taken care that at no point of time, our either untreated or treated effluent enters any water course and the treated effluent with characteristics within consented limits is disposed on the land reserved for irrigation of the same with no untoward effect observed. The above is supported by-
  - A) Results of Online monitoring which is attached as **Annexure- I**
  - B) Results of JVS samples, for the present crushing season 2022-2023, attached as **Annexure-II**
- 4) The Disposal of our treated effluent of quantity of about 750 cum is on land for irrigation under a special scheme named as "Rasulwadi Sambarwadi, wherein, the treated effluent from Karkhana is subjected to crop irrigation scheme of the farmers with a total acreage of about 120 Acres. This scheme and practice is continuing for past about 34 Years and **No untoward effect on the sugar cane crop of the farmers is observed** or reported. This is substantiated by the crop record for the irrigated area for last three years, attached as **Annexure III**. Further,





# Shri Dutt India Private Limited

(Operator of Vasantdada S.S.S.K. Ltd. Sangli)

Madhavnagar Road, Sangli - 416416. Tel. No. 9112688888, 9112788888

- this land is about 14 KM away from Krishna River and therefore there is no possibility of this water reaching river.
- 5) **Since we do not have enough water to be fed to farmer's farms, there is and was never a question of letting out any water in any nalla, and for which, there is no provision in the first place.**
  - 6) The mentioned leakage of untreated/partially treated pale yellow coloured effluent of alleged pH of about 5-6 could not be originated from our industry, since we have maintained treated parameters well within limits and we do not generate any pale yellow coloured treated effluent. Furthermore, all our untreated or treated effluent transfer is by pipeline only, and therefore, could not be entrained in any Nalla. At no point of time therefore, our untreated or treated effluent has caused the said pollution.
  - 7) We have pointed out during the visit of officials that there was a leakage in the pipeline carrying Spentwash from adjoining distillery, and which we had pointed out to their management. However, some Spentwash, entered in adjoining natural drain meant for carrying rain water. Photograph to this effect, already submitted to your office, is attached as **Annexure IV**.
  - 8) **That there is no possibility of this leaked Spentwash entering in our Condensate Lagoon, as there is no entry point for our lagoon from the nalla, where the Spentwash leaked, and also the lagoon levels are at far higher than the nalla bottom. As such, the possibility of any Spentwash, mixing through any of our water body clearly does not arise. Therefore, we have no part of any pollution arising out of any leakage outside our system.**
  - 9) We have a valid Consent to Operate (Copy attached as **Annexure V**) and are scrupulously maintaining the stipulated conditions.
  - 10) We have already completed Upgradation Plan for our existing ETP to further increase the efficiency and the measures fulfilled are:-
    - a) In Plant Control:- Fixing of Mechanized Screen, Sensor based recycles to minimize effluent volume & strength.  
These measures have reduced the quantity and concentration of effluent.
    - b) We have already segregated the condensates and reusing the same after treatment. This system is upgraded with addition of 'Nitrification', which made it possible to reuse the condensate.
    - c) We have scrapped excess quantity treated effluent containing storage lagoon, and restricted the storage lagoon capacity to 15 days storage capacity, wherein, it shall be used for storing of treated effluent, during 'No Irrigation' period, as per stipulation from M.P.C.B. This lagoon is completely leak proof by HDPE membrane lining.
    - d) We have always maintained the ETP and Disposal facility, with continuous monitoring by the Environmental Team.





# Shri Dutt India Private Limited

(Operator of Vasantdada S.S.S.K. Ltd. Sangali)

Madhavnagar Road, Sangli - 416416. Tel. No. 9112688888, 9112788888

The foregoing clearly reveals our intention of not causing pollution willfully, and we have always abided by guidelines from M.P.C.B. We would like to respectfully submit the following for your kind consideration:-

- A) Neither we have a provision/arrangement for discharge of untreated/treated effluent in outside environment, nor have we intentionally done it at any time, during all these years of operation. We therefore have no role in any pollution arising from any other sources, and would like to firmly deny any role in the same.
- B) We also would like to highlight our record for effluent treatment, which is supported by both online monitoring and also the vigilance sample results.
- C) That there is no untoward effect on crop due to disposal, which is depicted by increased yield for the crop area irrigated.
- D) We have always abided by your directions, and promptly closed operation of our ongoing crushing season, on receiving instructions from your office.

We therefore request you to review our case in the above light, and request you to not to take any action against our unit, and for no fault of ours. We are running this Sugar factory, which benefits thousands of Farmers, who get due, price for their cultivation and have always maintained stipulated conditions with guidance from visiting officials and followed them in TOTO.

We on our part shall assure you of our Best Efforts for betterment of Environmental Management Systems.

Thanking You in Anticipation.

Yours Faithfully

**For Shri Dutt India Pvt. Ltd.**

Copy submitted to -

**I. THE REGIONAL OFFICER,**

Maharashtra Pollution Control Board,  
Kolhapur.



## Annexure I

### AVERAGE ANALYSIS RESULTS FOR ONLINE MONITORING SYSTEM

Month	COD (mg/l)	BOD (mg/l)	TSS (mg/l)	Flow (m <sup>3</sup> /hr.)	pH
January	78.15	27.42	23.59	28.50	7.16
February	71.95	21.86	24.92	27.15	7.41
March	68.40	22.38	23.76	24.65	7.34



**MAHARASHTRA POLLUTION CONTROL BOARD  
REGIONAL LABORATORY, CHIPLUN**

Phone no. : 02355-261970  
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mail : [mpcbchiplunlab@mpcb.gov.in](mailto:mpcbchiplunlab@mpcb.gov.in)



Regional Laboratory, Chiplun,  
Maharashtra Pollution Control Board,  
105,106 Parkar Complex, 1st Floor,  
Behind Nagar Parishad, Chiplun, Dist.  
Ratnagiri. 415 605

NABL Certificate No.:

Validity

Laboratory MoEF Recognition :

Validity

Test Report No.: MPCB/RL-Chiplun/JVS/22-23/02/187

Date: 09/02/2023 07:18 PM

**Analysis Report-Water (JVS)**

<b>Field Sample ID :</b>	BR-0038225		
<b>Name &amp; Address of the Industry</b>	Shri Dutt India Pvt. Ltd (Operator of M/s. Vasantdada Shetkari Sahakari Sakhar Karakhana Ltd.) Sangli R12 Sugar ( excluding Khandsari)		
<b>Sampling Location :</b>	ETP (Outlet)		
<b>Lab code :</b>	MPCB/RL-Chiplun/JVS/22-23/1388		
<b>Sampling Method(s) :</b>		<b>Sample Details (Water/Air/HW) :</b>	Water
<b>Sampling drawn by (Officer name):</b>	FO-Sangli (Shri. Rohidas R. Matkar)	<b>Sample Volume Received :</b>	
<b>Sample submitted by (Name) :</b>	FO-Sangli (Shri. Rohidas R. Matkar) (SRO-Sangli)	<b>Seal No. :</b>	173
<b>Date of Sample Collection.(dd/mm/yyyy) :</b>	31/12/2022 11:50 AM	<b>Date of Sample receipt to Laboratory (dd/mm/yyyy) :</b>	06/01/2023 03:28 PM
<b>Analysis start Date (dd/mm/yyyy) :</b>	06/01/2023 04:27 PM		

**Test Report**

Sr.No	Parameter	Results	Unit	Method Adopted	MU( If required)
1	pH	6.9			
2	Total Dissolved Solids(TDS)	491.0	mg/l		
3	Suspended Solids ( SS )	46.0	mg/l		
4	Biochemical Oxygen Demand (BOD)	60.0	mg/l		



Sr.No	Parameter	Results	Unit	Method Adopted	MU( If required)
5	Chloride	56.88	mg l		
6	Chemical Oxygen Demand (COD)	183.2	mg l		
7	Sulphate	45.80	mg l		
8	Oil & Grease	BDL	mg l		

### End of The Report

Abbreviations: - BDL=Below Detectable limit, N.D.=Not Detected, N.A = Not Analyzed. \* Not covered under NABL scop.

**Comment (if any):**

**Comment for Amended Report:**

**Remark: - Note: This test report refers only to the sample submitted for the testing.**

**Results Compiled by:** Anil N Sandansing

**Results Approved by:** Anil N Sandansing

**Results Reviewed by:** Anil N Sandansing

**Anil N Sandansing**  
I/c Scientific Officer,  
Regional Laboratory,  
Chiplun.

# This is an Electronically generated report does not require signature

**Note :**

1. Results relate only to the sample/s tested, only in case of samples submitted by customer & not drawn by MPCB
2. # indicates paramters are not in scope of NABL(ISO:17025:2017)
3. Samples will be preserved for a period 10 days from the delivery of Test Certificate.
4. Customer complaint register is available at laboratory.
5. The Contents of this Report shall not be reproduced in part or in full without written approval of laboratory.
6. MU values will be reported on request



**MAHARASHTRA POLLUTION CONTROL BOARD  
REGIONAL LABORATORY, CHIPLUN**

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Visit us at : <http://mpcb.gov.in>  
mail : mpcbchiplunlab@mpcb.gov.in



Regional Laboratory, Chiplun.  
Maharashtra Pollution Control Board,  
105,106 Parkar Complex, 1st Floor.  
Behind Nagar Parishad, Chiplun, Dist.  
Ratnagiri. 415 605

NABL Certificate No.:

Validity

Laboratory MoEF Recognition :

Validity

Test Report No.: MPCB/RL-Chiplun/JVS/22-23/03/269

Date: 23/03/2023 02:28 PM

**Analysis Report-Water (JVS)**

<b>Field Sample ID :</b>	BR-0040110		
<b>Name &amp; Address of the Industry</b>	Shri Dutt India Pvt. Ltd (Operator of M/s. Vasantdada Shetkari Sahakari Sakhar Karakhana Ltd.) Sangli R12 Sugar ( excluding Khandsari)		
<b>Sampling Location :</b>	ETP (Outlet)		
<b>Lab code :</b>	MPCB/RL-Chiplun/JVS/22-23/1613		
<b>Sampling Method(s) :</b>		<b>Sample Details (Water/Air/HW) :</b>	Water
<b>Sampling drawn by (Officer name):</b>	FO-Sangli (Shri. Rohidas R. Matkar)	<b>Sample Volume Received :</b>	
<b>Sample submitted by (Name) :</b>	FO-Sangli (Shri. Rohidas R. Matkar) (SRO-Sangli)	<b>Seal No. :</b>	173
<b>Date of Sample Collection.(dd/mm/yyyy) :</b>	27/01/2023 01:05 PM	<b>Date of Sample receipt to Laboratory (dd/mm/yyyy) :</b>	02/02/2023 04:14 PM
<b>Analysis start Date (dd/mm/yyyy) .:</b>	06/02/2023 11:49 AM		

**Test Report**

Sr.No	Parameter	Results	Unit	Method Adopted	MU( If required)
1	pH	7.0			
2	Total Dissolved Solids(TDS)	431.0	mg/l		
3	Suspended Solids ( SS )	19.0	mg/l		
4	Biochemical Oxygen Demand (BOD)	64.0	mg/l		



Sr.No	Parameter	Results	Unit	Method Adopted	MU( If required)
5	Chloride	59.38	mg/l		
6	Chemical Oxygen Demand (COD)	192.0	mg/l		
7	Sulphate	33.39	mg/l		
8	Oil & Grease	BDL	mg/l		

### End of The Report

Abbreviations: - BDL=Below Detectable limit, N.D.=Not Detected, N.A.= Not Analyzed, \* Not covered under NABL scop.

**Comment (if any):**

**Comment for Amended Report:**

**Remark: - Note: This test report refers only to the sample submitted for the testing.**

**Results Compiled by: Anil N Sandansing**

**Results Approved by: Anil N Sandansing**

**Results Reviewed by: Anil N Sandansing**

**Anil N Sandansing**  
I/c Scientific Officer,  
Regional Laboratory,  
Chiplun,

# This is an Electronically generated report does not require signature

**Note :**

1. Results relate only to the sample/s tested, only in case of samples submitted by customer & not drawn by MPCB.
2. # indicates paramters are not in scope of NABL(ISO:17025:2017)
3. Samples will be preserved for a period 10 days from the delivery of Test Certificate.
4. Customer complaint register is available at laboratory.
5. The Contents of this Report shall not be reproduced in part or in full without written approval of laboratory.
6. MU values will be reported on request.



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Regional Laboratory, Chiplun,  
Maharashtra Pollution Control Board,  
105,106 Parkar Complex, 1st Floor,  
Behind Nagar Parishad, Chiplun, Dist.  
Ratnagiri. 415 605

NABL Certificate No.:

Validity

Laboratory MoEF Recognition :

Validity

Test Report No.: MPCB/RL-Chiplun/JVS/22-23/01/27

Date: 18/01/2023 02:56 PM

**Analysis Report-Water (JVS)**

<b>Field Sample ID :</b>	BR-0033125		
<b>Name &amp; Address of the Industry</b>	Shri Dutt India Pvt. Ltd (Operator of M/s. Vasantdada Shetkari Sahakari Sakhar Karakhana Ltd.) Sangli R12 Sugar ( excluding Khandsari)		
<b>Sampling Location :</b>	ETP (Outlet)		
<b>Lab code :</b>	MPCB/RL-Chiplun/JVS/22-23/1142		
<b>Sampling Method(s) :</b>		<b>Sample Details (Water/Air/HW) :</b>	Water
<b>Sampling drawn by (Officer name):</b>	FO-Sangli (Shri Rohidas R. Matkar)	<b>Sample Volume Received :</b>	
<b>Sample submitted by (Name) :</b>	FO-Sangli (Shri. Rohidas R. Matkar) (SRO-Sangli)	<b>Seal No. :</b>	173
<b>Date of Sample Collection.(dd/mm/yyyy) :</b>	29/11/2022 11:25 AM	<b>Date of Sample receipt to Laboratory (dd/mm/yyyy) :</b>	07/12/2022 04:52 PM
<b>Analysis start Date (dd/mm/yyyy). :</b>	08/12/2022 11:40 AM		

**Test Report**

Sr.No	Parameter	Results	Unit	Method Adopted	MU( If required)
1	pH	8.2			
2	Total Dissolved Solids(TDS)	547.0	mg l		
3	Suspended Solids ( SS )	17.0	mg l		
4	Biochemical Oxygen Demand (BOD)	6.0	mg l		



Sr.No	Parameter	Results	Unit	Method Adopted	MU( If required)
5	Chloride	65.38	mg/l		
6	Chemical Oxygen Demand (COD)	52.0	mg/l		
7	Sulphate	87.35	mg/l		
8	Oil & Grease	BDL	mg/l		

### End of The Report

Abbreviations: - BDL=Below Detectable limit, N.D.=Not Detected, N.A.= Not Analyzed, \* Not covered under NABL scop.

**Comment (if any):**

**Comment for Amended Report:**

**Remark: - Note: This test report refers only to the sample submitted for the testing.**

**Results Compiled by:** Anil N Sandansing

**Results Approved by:** Anil N Sandansing

**Results Reviewed by:** Anil N Sandansing

Anil N Sandansing  
I/c Scientific Officer,  
Regional Laboratory,  
Chiplun.

# This is an Electronically generated report does not require signature

Note :

1. Results relate only to the sample's tested, only in case of samples submitted by customer & not drawn by MPCB.
2. # indicates paramters are not in scope of NABL(ISO:17025:2017)
3. Samples will be preserved for a period 10 days from the delivery of Test Certificate.
4. Customer complaint register is available at laboratory.
5. The Contents of this Report shall not be reproduced in part or in full without written approval of laboratory.
6. MU values will be reported on request.



### Annexure III

## Rasulwadi – Sambarwadi Waste Water Scheme cane yield in crushing season

<b>Crushing Season</b>	<b>Total Cane Crop in MT</b>
2020-21	<b>3485</b>
2021-22	<b>3966</b>
2022-23	<b>4430</b>



### Spent wash line leakage





# MAHARASHTRA POLLUTION CONTROL BOARD

Tel: 24010706/24010437  
 Fax: 24023516  
 Website: <http://mpcb.gov.in>  
 Email: [cac-cell@mpcb.gov.in](mailto:cac-cell@mpcb.gov.in)



Kalpataru Point, 2nd and 4th floor, Opp. Cine Planet Cinema, Near Sion Circle, Sion (E), Mumbai-400022

No:- Format1.0/CAC/UAN No.MPCB-  
 CONSENT-0000176314/CR/2311001823

Date: 23/11/2023

To,  
 Shri Dutt India Pvt. Ltd. (Operator of M/s. Vasantdada Shetkari Sahakari Sakhar Karkhana Ltd).  
 173/156/167/188,A/P - Madhavnagar Road,  
 Miraj,Sangli.



**Sub: Renewal of consent for 7500 TCD Sugar Unit**

**Ref: 1. Renewal of consent granted by the Board vide no.Format1.0/CAC/UAN No.MPCB- CONSENT-0000092842/Cr-2011000172 dtd. 04.11.2020. valid up to 31.07.2023.**  
**2. Minutes of CAC Meeting dtd. 06.11.2023.**

Your application No.MPCB-CONSENT-0000176314 Dated 17.07.2023

For: grant of Consent to Renewal under Section 26 of the Water (Prevention & Control of Pollution) Act, 1974 & under Section 21 of the Air (Prevention & Control of Pollution) Act, 1981 and Authorization under Rule 6 and Rule 18(7) of the Hazardous & Other Wastes (Management & Transboundary Movement) Rules 2016 is considered and the consent is hereby granted subject to the following terms and conditions and as detailed in the schedule I, II, III & IV annexed to this order:

- The Consent to Renewal is granted upto: 31.07.2024**
- The capital investment of the industry is Rs.293.7003 Crs. (As per C.A Certificate submitted by industry).**
- Consent is valid for the manufacture of:**

Sr No	Product	Maximum Quantity	UOM
1	Sugar	28125	MT/M
2	Molasses	9000	MT/M
3	Bagasses	52217	MT/M
4	Pressmud	7800	MT/M

- The Cane crushing capacity of Sugar unit shall not exceed 7500 TCD**
- Conditions under Water (P&CP) Act, 1974 for discharge of effluent:**

Sr No	Description	Permitted in CMD	Standards to	Disposal
1.	Trade effluent	750	As per Schedule -I	On land for irrigation
2.	Domestic effluent	40	As per Schedule - I	On land for irrigation.



5. **Conditions under the Air (P& CP) Act, 1981 for air emissions:**

Stack No.	Description of stack / source	Number of Stack	Standards to be achieved
1	Boiler No. 1, 2 & 3	1	As per Schedule -II
2	Boiler No. 4 & 5	1	As per Schedule -II
3	Boiler No. 6, 7 & 8	1	As per Schedule -II

6. **Conditions about Non Hazardous Wastes:**

Sr No	Type of Waste	Quantity	UoM	Treatment	Disposal
1	Boiler Ash	3013	MT/A	NA	Sale to Bricks Manufactures
2	ETP Sludge	10	MT/A	NA	Used as Manure

7. **Conditions under Hazardous & Other Wastes (M & T M) Rules 2008 for treatment and disposal of hazardous waste:**

Sr No	Type of Waste	HW Category.	Quantity & UoM	Treatment	Disposal
1	5.1 Used or spent oil	5.1	2 MT/A	Recycle	Sale to authorizd recycler

The applicant shall ensure disposal to the Actual user having permissions under Rule 9 of Hazardous and other Waste (M & TM) Rules, 2016.

a. The applicant shall properly collect, transport & regularly dispose of the hazardous waste to CHWTSDf, in compliance of the Hazardous & Other Wastes (Management & Transboundry Movement) Rules, 2016 and keep proper manifest thereof.

8. The Board reserves the right to review, amend, suspend, revoke etc. this consent and the same shall be binding on the industry.
9. This consent should not be construed as exemption from obtaining necessary NOC/permission from any other Government authorities.
10. Industry shall connect online CMS data as per CPCB guidelines to CPCB & MPCB Servers.
11. This consent is issued as per the Consent Appraisal Committee meeting dated 06.11.2023.
12. PP shall comply with the all the orders/directions issued by Hon'ble NGT in OA No. 32/2023.
13. PP shall comply with the Conditional restart direction issued on 04.10.2023.
14. The consent is issued subject to the conditions and without prejudice to the orders passed or may be passed by the Hon'ble NGT.
15. PP shall not discharge treated /untreated effluent in any water bodies directly or indirectly.



16. The applicant shall make an application for renewal of the consent at least 60 days before the date of the expiry of the consent.



*Dr. Avinash*

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5774c699  
b4c219cf

Signed by: **Dr. Avinash Dhakne**  
Member Secretary  
For and on behalf of,  
**Maharashtra Pollution Control Board**  
ms@mpcb.gov.in  
2023-11-28 16:42:13 IST

**Received Consent fee of -**

Sr.No	Amount(Rs.)	Transaction/DR.No.	Date	Transaction Type
1	587401.00	TXN2307001864	14/07/2023	Online Payment
2	50000.00	TXN2311003049	22/11/2023	Online Payment

**Copy to:**

1. Regional Officer, MPCB, Kolhapur and Sub-Regional Officer, MPCB, Sangli  
- They are directed to ensure the compliance of the consent conditions.
2. Chief Accounts Officer, MPCB, Sion, Mumbai
3. CC/CAC desk - for record & website updation purposes.



**SCHEDULE-I****Terms & conditions for compliance of Water Pollution Control:**

- 1) A] As per your application, you have Provided Effluent Treatment Plant (ETP) of designed capacity of 1000.00 CMD consisting of Primary, Secondary, Tertiary for the treatment of 750.00 CMD industrial effluent.
- B] Industry shall provide CPU for recycle/reuse of treated effluent.
- C] The Applicant shall operate the effluent treatment plant (ETP) to treat the trade effluent so as to achieve the following standards prescribed by the Board or under EP Act, 1986 and Rules made there under from time to time, whichever is stringent.

Sr. No.	Parameters	Limiting concentration not to exceed in mg/l, except for pH
(1)	pH	5.5-9.0
(2)	Oil & Grease	10
(3)	BOD (3 days 27 <sup>o</sup> C)	100
(4)	Sulphate	1000
(5)	Suspended Solids	100
(6)	COD	250
(7)	Chloride	600
(8)	Total Dissolved Solids	2100

- D] The treated effluent 750.00 CMD shall be disposed on land for irrigation on 22.25 hectares of own land /as per the bilateral agreement with farmers. In no any case treated/untreated effluent shall find its way outside the factory premises directly or indirectly.
- E] Industry shall operate Online Continuous Emission Monitoring System (OCEMS) and shall transmit Online Continuous Emission Monitoring System (OCEMS) data to Board's server directly through the data logger without any intermediate server.
- F] Trade effluent of 0.00 CMD generated from Co-gen shall be 100% recycle in process.
- G] CREP conditions for Sugar Factory
- Operation of ETP shall be started at least one month before starting of cane crushing to achieve desired MLSS. So as to meet prescribed standards from day one the operation of mill.
  - Waste water generation shall be reduced to 100 liters per tone of cane crushed.
  - Industry shall achieve zero discharge into in land surface water bodies.
  - 15 days' storage capacity tank shall be provided for treated effluent to take care during no demand for irrigation.



**H) Industry to make necessary arrangement to cover the effluent collection system and to avoid the ingress of Bagasse and other material.**

**I) The unit shall operate ETP even after completion of the crushing season so that any effluent generated during washing & maintenance activity is to be discharged after proper treatment.**

**J) The unit shall optimize water use in industrial process & maintain records.**

2) **A) As per your application, you have provided septic tank and soak pit for the treatment of 40.00 CMD sewage.**

**B) The applicant shall operate sewage treatment system to treat sewage so as to achieve the following standards/ prescribed under EP Act 1986 and rules made under time to time, whichever is stringent.**

1	Suspended Solids	Not to exceed	100 mg/l
2	BOD 3 days (27°C)	Not to exceed	100 mg/l

**C) The treated sewage shall be 100% reused/recycled for gardening purpose within premise. In no any case, sewage shall find its way outside Company's premises.**

3) The industry shall have bilateral agreement with the farmers on whose land the treated effluent is used for irrigation purposes and a copy of the agreements with validity shall be submitted to the Regional/Sub- Regional Office of the Board.

4) The industry shall create Environmental Cell by appointing an Environmental Engineer, Chemist and Agriculture expert for looking after day to day activities related to Environment and irrigation field where treated effluent is used for irrigation.

5) **CONDITIONS FOR MOLASSES STORAGE:**

(i) The molasses shall be properly collected and stored in steel tanks which shall be leak proof. At no stage of handling of molasses, there shall be leakage or spillage.

(ii) The capacity of tanks for storage of molasses shall be such that it will take care of bumper production of sugar, non-lifting of molasses etc.

(iii) All the area on which molasses are stored and handled should be provided with drain for diverting the spills to the treatment plant/ molasses tank. Suitable arrangements for accidental discharges of molasses from the tanks shall be provided to contain the same within factory premises.

(iv) Destruction of molasses and its disposal shall not be done without specific permission in writing from the authorized officer of the Board. Intimation of intention to destroy or dispose of the molasses shall be given to the Board at least 15 (fifteen) days in advance by registered post under intimation to the Sub-Regional officer and Regional officer of the Board under whose jurisdiction the factory is situated.

(v) The storage tanks shall be kept in good conditions all the year round with adequate maintenance. The tanks size and capacity per cm, height, total capacity in tonnes shall be displayed prominently near /on the tank.

(vi) The above conditions shall be in addition to and not in derogation of the provisions contained in the "Bombay Molasses Rules, 1955" and "Maharashtra Molasses Storage and Supply Regulation, 1965".

6) The Applicant shall provide Specific Water Pollution control system as per the conditions of EP Act, 1986 and rule made there under from time to time/ Environmental Clearance / CREP guidelines if applicable.



- 7) The Board reserves its rights to review plans, specifications or other data relating to plant setup for the treatment of waterworks for the purification thereof & the system for the disposal of sewage or trade effluent or in connection with the grant of any consent conditions. The Applicant shall obtain prior consent of the Board to take steps to establish the unit or establish any treatment and disposal system or an extension or addition thereto.
- 8) The industry shall ensure replacement of pollution control system or its parts after expiry of its expected life as defined by manufacturer so as to ensure the compliance of standards and safety of the operation thereof.
- 9) The Applicant shall comply with the provisions of the Water (Prevention & Control of Pollution) Act, 1974 and as amended, by installing water meters, and other provisions as contained in the said act:

Sr. No.	Purpose for water consumed	Water consumption quantity (CMD)
1.	Industrial Cooling, spraying in mine pits or boiler feed	250.00
2.	Domestic purpose	50.00
3.	Processing whereby water gets polluted & pollutants are easily biodegradable	800.00
4.	Processing whereby water gets polluted & pollutants are not easily biodegradable and are toxic	0.00
5.	Grandening	0

- 10) The Applicant shall provide Specific Water Pollution control system as per the conditions of EP Act, 1986 and rule made there under from time to time/ Environmental Clearance/ CREP guidelines.

#### SCHEDULE-II

##### Terms & conditions for compliance of Air Pollution Control:

- 1) As per your application, you have provided the Air pollution control (APC) system and erected following stack(s) and observe the following fuel pattern-

Stack No.	Stack Attached To	APC System	Height in Mtrs.	Type of Fuel	Quantity & UoM	S%	SO <sub>2</sub>
1	Boiler No. 1, 2 & 3	Venture Wet Scrubber	42	Bagasses	540 MT/Day	0.20	2160.00
2	Boiler No. 4 & 5	Venture Wet Scrubber	62	Bagasses	480 MT/Day	0.20	1920.00
3	Boiler No. 6, 7 & 8	Venture Wet Scrubber	72	Baggages	840 MT/Day	0.20	3360.00

- 2) The Applicant shall provide Specific Air Pollution control equipments as per the conditions of EP Act, 1986 and rule made there under from time to time/ Environmental Clearance / CREP guidelines.

- 1) The Applicant shall provide ESP/ Bag filter/ Wet scrubber to the Bagasse fired boiler and Dust Collector to Sugar bagging section as an Air Pollution control equipments OR as per the conditions of EP Act, 1986 and rule made there under from time to time / Environmental Clearance / CREP guidelines.



2 The applicant shall operate and maintain above mentioned air pollution control system, so as to achieve the level of pollutants to the following standards:

Total Particulate matter	Not to exceed	50 mg/Nm <sup>3</sup>
--------------------------	---------------	-----------------------

- 3 The Applicant shall obtain necessary prior permission for providing additional control equipment with necessary specifications and operation thereof or alteration or replacement/alteration well before its life come to an end or erection of new pollution control equipment.
- 4 The Board reserves its rights to vary all or any of the condition in the consent, if due to any technological improvement or otherwise such variation (including the change of any control equipment, other in whole or in part is necessary).
- 5 Industry should not use auxiliary fuel more than 15 % (as per amendment in EIA Notification 2009, power plant upto 15 MW based on Bio-mass and using auxiliary fuel as coal upto 15% are exempt.) as co-gen capacity is below 15 MW.
- 3) The Applicant shall obtain necessary prior permission for providing additional control equipment with necessary specifications and operation thereof or alteration or replacement/alteration well before its life come to an end or erection of new pollution control equipment.**
- 4) The Board reserves its rights to vary all or any of the condition in the consent, if due to any technological improvement or otherwise such variation (including the change of any control equipment, other in whole or in part is necessary).**

### SCHEDULE-III

#### Details of Bank Guarantees:

Sr. No.	Consent(C2E/C20/C2R)	Amt of BG Imposed	Submission Period	Purpose of BG	Compliance Period	Validity Date
1	C to R	25 lakh	15 days/extended	Towards compliance of Consent conditions & O & M of pollution control system.	31.07.2024	30.11.2024

#### BG Forfeiture History

Srno.	Consent (C2E/C20/C2R)	Amount of BG imposed	Submission Period	Purpose of BG	Amount of BG Forfeiture	Reason of BG Forfeiture
NA						

### SCHEDULE-IV

#### General Conditions:

- 1 The applicant shall provide facility for collection of environmental samples and samples of trade and sewage effluents, air emissions and hazardous waste to the Board staff at the terminal or designated points and shall pay to the Board for the services rendered in this behalf.



- 2 The applicant shall provide ports in the chimney/(s) and facilities such as ladder, platform etc. for monitoring the air emissions and the same shall be open for inspection to/and for use of the Board's Staff. The chimney(s) vents attached to various sources of emission shall be designated by numbers such as S-1, S-2, etc. and these shall be painted/ displayed to facilitate identification.
- 3 Whenever due to any accident or other unforeseen act or even, such emissions occur or is apprehended to occur in excess of standards laid down, such information shall be forthwith Reported to Board, concerned Police Station, office of Directorate of Health Services, Department of Explosives, Inspectorate of Factories and Local Body. In case of failure of pollution control equipment, the production process connected to it shall be stopped.
- 4 The applicant shall provide an alternate electric power source sufficient to operate all pollution control facilities installed to maintain compliance with the terms and conditions of the consent. In the absence, the applicant shall stop, reduce or otherwise, control production to abide by terms and conditions of this consent.
- 5 The firm shall submit to this office, the 30th day of September every year, the Environmental Statement Report for the financial year ending 31st March in the prescribed Form-V as per the provisions of rule 14 of the Environment (Protection) (Second Amendment) Rules, 1992.
- 6 The industry should comply with the Hazardous & Other Wastes (M & TM) Rules, 2016 and submit the Annual Returns as per Rule 6(5) & 20(2) of Hazardous & Other Wastes (M & TM) Rules, 2016 for the preceding year April to March in Form-IV by 30th June of every year.
- 7 An inspection book shall be opened and made available to the Board's officers during their visit to the applicant.
- 8 The industry shall constitute an Environmental cell with qualified staff/personnel/agency to see the day to day compliance of consent condition towards Environment Protection.
- 9 The applicant shall install a separate meter showing the consumption of energy for operation of domestic and industrial effluent treatment plants and air pollution control system. A register showing consumption of chemicals used for treatment shall be maintained.
- 10 The applicant shall bring minimum 33% of the available open land under green coverage/ plantation. The applicant shall submit a yearly statement by 30th September every year on available open plot area, number of trees surviving as on 31st March of the year and number of trees planted by September end.
- 11 The industry shall submit official e-mail address and any change will be duly informed to the MPCB.
- 12 Industry should monitor effluent quality, stack emissions and ambient air quality monthly/quarterly.
- 13 The industry shall recycle/reprocess/reuse/recover Hazardous Waste as per the provision contain in the H&OW(M&TM) Rules 2016, which can be recycled/processed/ reused/ recovered and only waste which has to be incinerated shall go to incineration and waste which can be used for land filling and cannot be recycled/ reprocessed etc. should go for that purpose, in order to reduce load on incineration and landfill site/environment.
- 14 Industry shall strictly comply with the Water (P&CP) Act, 1974, Air (P&CP) Act,1981 and Environmental Protection Act,1986 and industry specific standard under EP Rules 1986 which are available on MPCB website(www.mpcb.gov.in).



- 15 Separate drainage system shall be provided for collection of trade and sewage effluents. Terminal manholes shall be provided at the end of the collection system with arrangement for measuring the flow. No effluent shall be admitted in the pipes/sewers downstream of the terminal manholes. No effluent shall find its way other than in designed and provided collection system.
- 16 Neither storm water nor discharge from other premises shall be allowed to mix with the effluents from the factory.
17. Conditions for D.G. Set
- Noise from the D.G. Set should be controlled by providing an acoustic enclosure or by treating the room acoustically.
  - Industry should provide acoustic enclosure for control of noise. The acoustic enclosure/ acoustic treatment of the room should be designed for minimum 25 dB (A) insertion loss or for meeting the ambient noise standards, whichever is on higher side. A suitable exhaust muffler with insertion loss of 25 dB (A) shall also be provided. The measurement of insertion loss will be done at different points at 0.5 meters from acoustic enclosure/room and then average.
  - Industry should make efforts to bring down noise level due to DG set, outside industrial premises, within ambient noise requirements by proper siting and control measures.
  - Installation of DG Set must be strictly in compliance with recommendations of DG Set manufacturer.
  - A proper routine and preventive maintenance procedure for DG set should be set and followed in consultation with the DG manufacturer which would help to prevent noise levels of DG set from deteriorating with use.
  - D.G. Set shall be operated only in case of power failure.
  - The applicant should not cause any nuisance in the surrounding area due to operation of D.G. Set.
  - The applicant shall comply with the notification of MoEFCC, India on Environment (Protection) second Amendment Rules vide GSR 371(E) dated 17.05.2002 and its amendments regarding noise limit for generator sets run with diesel.
- 18 The industry should not cause any nuisance in surrounding area.
- 19 The industry shall take adequate measures for control of noise levels from its own sources within the premises so as to maintain ambient air quality standard in respect of noise to less than 75 dB (A) during day time and 70 dB (A) during night time. Day time is reckoned in between 6 a.m. and 10 p.m. and night time is reckoned between 10 p.m. and 6 a.m.
- 20 The applicant shall maintain good housekeeping.
- 21 The non-hazardous solid waste arising in the factory premises, sweepings, etc. be disposed of scientifically so as not to cause any nuisance / pollution. The applicant shall take necessary permissions from civic authorities for disposal of solid waste.
- 22 The applicant shall not change or alter the quantity, quality, the rate of discharge, temperature or the mode of the effluent/emissions or hazardous wastes or control equipment provided for without previous written permission of the Board. The industry will not carry out any activity, for which this consent has not been granted/without prior consent of the Board.
- 23 The industry shall ensure that fugitive emissions from the activity are controlled so as to maintain clean and safe environment in and around the factory premises.



24 The industry shall achieve the National Ambient Air Quality standards prescribed vide Government of India, Notification dtd. 16.11.2009 as amended.

This certificate is digitally & electronically signed.





# Maharashtra Pollution Control Board

## 5fa27038ecca0968bddd5ad0

### MAHARASHTRA POLLUTION CONTROL BOARD

Tel: 24010706/24010437  
 Fax: 24023516  
 Website: <http://mpcb.gov.in>  
 Email: [cac-cell@mpcb.gov.in](mailto:cac-cell@mpcb.gov.in)



Kalpataru Point, 2nd and 4th  
 floor, Opp. Cine Planet Cinema,  
 Near Slon Circle, Slon (E),  
 Mumbai-400022

No:- Format1.0/CAC/UAN No.MPCB-  
 CONSENT-0000092842/CR - 2011000172

Date: 04/11/2020

To,  
 Shri Dutt India Pvt. Ltd. (Operator of M/s. Vasantdada Shetkari Sahakari Sakhar  
 Karkhana Ltd).  
 173/156/167/188,A/P - Madhavnagar Road,  
 Miraj,Sangli.

**Sub: Renewal of 7500 TCD sugar unit. Under M.S.I RED Category**

**Ref: 1. Renewal of consent granted by the Board vide no. CAC/UAN NO.  
 MPCBCONSENT-0000076217/CR-2002001163 dtd. 26.02.2020.  
 2. Minutes of CAC Meeting dtd. 11.09.2020**

Your application No.MPCB-CONSENT-0000092842 Dated 30.06.2020

For: grant of Consent to Renewal under Section 26 of the Water (Prevention & Control of  
 Pollution) Act, 1974 & under Section 21 of the Air (Prevention & Control of Pollution) Act,  
 1981 and Authorization under Rule 6 of the Hazardous & Other Wastes (Management &  
 Transboundary Movement) Rules 2016 is considered and the consent is hereby granted  
 subject to the following terms and conditions and as detailed in the schedule I, II, III & IV  
 annexed to this order:

1. **The Consent to Renewal is granted upto: 31.07.2023**
2. **The capital investment of the industry is Rs.280.6229 Crs. (As per C.A  
 Certificate submitted by industry).**
3. **Consent is valid for the manufacture of:**

Sr No	Product	Maximum Quantity	UOM
1	Sugar	28125	MT/M
2	Molasses	9000	MT/M
3	Bagasses	52217	MT/M
4	Pressmud	7800	MT/M

**The Cane crushing capacity of Sugar unit shall not exceed 7500 TCD**

4. **Conditions under Water (P&CP) Act, 1974 for discharge of effluent:**

Sr No	Description	Permitted in CMD	Standards to	Disposal
1.	Trade effluent	750	As per Schedule -I	On land for irrigation
2.	Domestic effluent	40	As per Schedule - I	onland for gardening / irrigation

Shri Dutt India Pvt. Ltd. (Operator of M/s. Vasantdada Shetkari Sahakari Sakhar Karkhana Ltd.)/CR/UAN  
 No.MPCB-CONSENT-0000092842





**5. Conditions under the Air (P& CP) Act, 1981 for air emissions:**

Stack No.	Description of stack / source	Number of Stack	Standards to be achieved
1	Boiler No. 1, 2 & 3	1	As per Schedule -II
2	Boiler No. 4 & 5	1	As per Schedule -II
3	Boiler No. 6, 7 & 8	1	As per Schedule -II

**6. Conditions about Non Hazardous Wastes:**

Sr No	Type of Waste	Quantity	UoM	Treatment	Disposal
1	Boiler Ash	3013	MT/A	NA	Sale to Bricks Manufactures
2	ETP Sludge	10	MT/A	NA	Used as Manure

**7. Conditions under Hazardous & Other Wastes (M & T M) Rules 2008 for treatment and disposal of hazardous waste:**

Sr No	Type of Waste	HW Category	Quantity & UoM	Treatment	Disposal
1	5.1 Used or spent oil	5.1	2 MT/A	Recycle	Sale to authorizd recycler

The applicant shall ensure disposal to the Actual user having permissions under Rule 9 of Hazardous and other Waste (M & TM) Rules, 2016.

a. The applicant shall properly collect, transport & regularly dispose of the hazardous waste to CHWTSDf, in compliance of the Hazardous & Other Wastes (Management & Transboundry Movement) Rules, 2016 and keep proper manifest thereof.

8. The Board reserves the right to review, amend, suspend, revoke etc. this consent and the same shall be binding on the industry.
9. This consent should not be construed as exemption from obtaining necessary NOC/permission from any other Government authorities.
10. Industry shall connect online CMS data as per CPCB guidelines to CPCB & MPCB Servers.
11. This consent is issued as per the Consent Appraisal Committee meeting dated 11.09.2020.
12. To improve water economy, PP shall submit detail water budget along with proposal towards recycling of treated effluent to the maximum extent including excess condensate into the process to reduce fresh water consumption, within a period of 3 months with activity bar chart
13. As JVS of source emission are exceeding, PP shall submit adequacy report of Air pollution control systems with improvement plan for O & M within period of 2 months
14. The applicant shall make an application for renewal of the consent at least 60 days before the date of the expiry of the consent.

For and on behalf of the  
Maharashtra Pollution Control Board.

  
(Ashok Shingare IAS),  
Member Secretary





**Received Consent fee of -**

Sr.No	Amount(Rs.)	Transaction/DR.No.	Date	Transaction Type
1	1683737.00	TXN2006001834	30/06/2020	Online Payment

**Copy to:**

1. Regional Officer, MPCB, Kolhapur and Sub-Regional Officer, MPCB, Sangli  
- They are directed to ensure the compliance of the consent conditions.  
- They are directed to forfeit the bank guarantee of Rs.5 Lakh & obtain top up BG of Rs. 15 Lakh from the industry
2. Chief Accounts Officer, MPCB, Sion, Mumbai
3. CC/CAC desk - for record & website updation purposes.

*Aditi Y. Mere*





**SCHEDULE-I**

**Terms & conditions for compliance of Water Pollution Control:**

- 1) **A) As per your application, you have Provided Effluent Treatment Plant (ETP) of designed capacity of 1000.00 CMD consisting of Primary, Secondary, Tertiary for the treatment of 750.00 CMD industrial effluent**
- B) The Applicant shall operate the effluent treatment plant (ETP) to treat the trade effluent so as to achieve the following standards prescribed by the Board or under EP Act, 1986 and Rules made there under from time to time, whichever is stringent.**

Sr. No.	Parameters	Limiting concentration not to exceed in mg/l, except for pH
(1)	pH	5.5-9.0
(2)	Oil & Grease	10
(3)	BOD (3 days 27°)	100
(4)	Sulphate	1000
(5)	Suspended Solids	100
(6)	COD	250
(7)	Chloride	600
(8)	Total Dissolved Solids	2100

- C) The treated effluent 750.00 CMD shall be disposed on land for irrigation on 22.25 hectares of own land /as per the bilateral agreement with farmers. In no any case treated/untreated effluent shall find its way outside the factory premises directly or indirectly.**
- D) Trade effluent of 0.00 CMD generated from Co-gen shall be 100% recycle in process.**
- E) CREP conditions for Sugar Factory**
- i. Operation of ETP shall be started at least one month before starting of cane crushing to achieve desired MLSS. So as to meet prescribed standards from day one the operation of mill.
  - ii. Waste water generation shall be reduced to 100 liters per tone of cane crushed.
  - iii. Industry shall achieve zero discharge into in land surface water bodies.
  - iv. 15 days' storage capacity tank shall be provided for treated effluent to take care during no demand for irrigation.
- F) Industry to make necessary arrangement to cover the effluent collection system and to avoid the ingress of Bagasse and other material.**
- G) The unit shall operate ETP even after completion of the crushing season so that any effluent generated during washing & maintenance activity is to be discharged after proper treatment.**
- H) The unit shall optimize water use in industrial process & maintain records.**

Shri Dutt India Pvt. Ltd. (Operator of M/s. Vasantdada Shelkari Sahakari Sakhar Karkhana Ltd.)/CR/UAAN  
No.MPCB-CONSENT-0000092842





- 2) A) As per your application, you have provided septic tank and soak pit for the treatment of 40.00 CMD sewage.
- B) The applicant shall operate sewage treatment system to treat sewage so as to achieve the following standards/ prescribed under EP Act 1986 and rules made under time to time, whichever is stringent.

1	Suspended Solids	Not to exceed	100 mg/l
2	BOD 3 days (27°C)	Not to exceed	100 mg/l

- C) The treated sewage shall be 100% reused/recycled for gardening purpose within premise. In no any case, sewage shall find its way outside Company's premises.
- 3) The industry shall have bilateral agreement with the farmers on whose land the treated effluent is used for irrigation purposes and a copy of the agreements with validity shall be submitted to the Regional/Sub- Regional Office of the Board.
- 4) The industry shall create Environmental Cell by appointing an Environmental Engineer, Chemist and Agriculture expert for looking after day to day activities related to Environment and irrigation field where treated effluent is used for irrigation.
- 5) CONDITIONS FOR MOLASSES STORAGE:
- (i) The molasses shall be properly collected and stored in steel tanks which shall be leak proof. At no stage of handling of molasses, there shall be leakage or spillage.
- (ii) The capacity of tanks for storage of molasses shall be such that it will take care of bumper production of sugar, non-lifting of molasses etc.
- (iii) All the area on which molasses are stored and handled should be provided with drain for diverting the spills to the treatment plant/ molasses tank. Suitable arrangements for accidental discharges of molasses from the tanks shall be provided to contain the same within factory premises.
- (iv) Destruction of molasses and its disposal shall not be done without specific permission in writing from the authorized officer of the Board. Intimation of intention to destroy or dispose of the molasses shall be given to the Board at least 15 (fifteen) days in advance by registered post under intimation to the Sub-Regional officer and Regional officer of the Board under whose jurisdiction the factory is situated.
- (v) The storage tanks shall be kept in good conditions all the year round with adequate maintenance. The tanks size and capacity per cm, height, total capacity in tonnes shall be displayed prominently near /on the tank.
- (vi) The above conditions shall be in addition to and not in derogation of the provisions contained in the "Bombay Molasses Rules, 1955?? and "Maharashtra Molasses Storage and Supply Regulation, 1965??.
- 6) The Applicant shall provide Specific Water Pollution control system as per the conditions of EP Act, 1986 and rule made there under from time to time/ Environmental Clearance / CREP guidelines if applicable.
- 7) The Board reserves its rights to review plans, specifications or other data relating to plant setup for the treatment of waterworks for the purification there of & the system for the disposal of sewage or trade effluent or in connection with the grant of any consent conditions. The Applicant shall obtain prior consent of the Board to take steps to establish the unit or establish any treatment and disposal system or an extension or addition thereto.



*Aditi V. More*



- 8) The industry shall ensure replacement of pollution control system or its parts after expiry of its expected life as defined by manufacturer so as to ensure the compliance of standards and safety of the operation thereof.
- 9) The Applicant shall comply with the provisions of the Water (Prevention & Control of Pollution) Act, 1974 and as amended, by installing water meters, and other provisions as contained in the said act:

Sr. No.	Purpose for water consumed	Water consumption quantity (CMD)
1.	Industrial Cooling, spraying in mine pits or boiler feed	250.00
2.	Domestic purpose	50.00
3.	Processing whereby water gets polluted & pollutants are easily biodegradable	800.00
4.	Processing whereby water gets polluted & pollutants are not easily biodegradable and are toxic	0.00
5.	Grandening	0

- 10) The Applicant shall provide Specific Water Pollution control system as per the conditions of EP Act, 1986 and rule made there under from time to time/ Environmental Clearance/ CREP guidelines.

*Arigano*





**SCHEDULE-II**

**Terms & conditions for compliance of Air Pollution Control:**

- 1) **As per your application, you have provided the Air pollution control (APC) system and erected following stack(s) and observe the following fuel pattern-**

Stack No.	Stack Attached To	APC System	Height in Mtrs.	Type of Fuel	Quantity & UoM	SO <sub>2</sub>	SO <sub>x</sub>
1	Boiler No. 1, 2 & 3	Venture Wet Scrubber	42	Bagasses	540 MT/Day	0.20	2160.00
2	Boiler No. 4 & 5	Venture Wet Scrubber	62	Bagasses	480 MT/Day	0.20	1920.00
3	Boiler No. 6, 7 & 8	Venture Wet Scrubber	72	Baggages	840 MT/Day	0.20	3360.00

- 2) **The Applicant shall provide Specific Air Pollution control equipments as per the conditions of EP Act, 1986 and rule made there under from time to time/ Environmental Clearance / CREP guidelines.**

1 The Applicant shall provide ESP/ Bag filter/ Wet scrubber to the Bagasse fired boiler and Dust Collector to Sugar bagging section as an Air Pollution control equipments OR as per the conditions of EP Act, 1986 and rule made there under from time to time / Environmental Clearance / CREP guidelines.

2 The applicant shall operate and maintain above mentioned air pollution control system, so as to achieve the level of pollutants to the following standards:

Total Particulate matter	Not to exceed	50 mg/Nm <sup>3</sup>
--------------------------	---------------	-----------------------

- 3 The Applicant shall obtain necessary prior permission for providing additional control equipment with necessary specifications and operation thereof or alteration or replacement/alteration well before its life come to an end or erection of new pollution control equipment.
- 4 The Board reserves its rights to vary all or any of the condition in the consent, if due to any technological improvement or otherwise such variation (including the change of any control equipment, other in whole or in part is necessary).
- 5 Industry should not use auxiliary fuel more than 15 % (as per amendment in EIA Notification 2009, power plant upto 15 MW based on Bio-mass and using auxiliary fuel as coal upto 15% are exempt.) as co-gen capacity is below 15 MW.
- 3) **The Applicant shall obtain necessary prior permission for providing additional control equipment with necessary specifications and operation thereof or alteration or replacement/alteration well before its life come to an end or erection of new pollution control equipment.**
- 4) **The Board reserves its rights to vary all or any of the condition in the consent, if due to any technological improvement or otherwise such variation (including the change of any control equipment, other in whole or in part is necessary).**



*Aditi V. More*



**SCHEDULE-III  
Details of Bank Guarantees:**

Sr. No.	Consent(C2E/C2O/C2R)	Amt of BG Imposed	Submission Period	Purpose of BG	Compliance Period	Validity Date
1	C to R	1500000	15 days/extended	Towards compliance of Consent conditions & O & M of pollution control system.	31.07.2023	30.11.2023
2	C to R	500000	15 days/extended	industry shall not operate stand by Boilers (3 nos.) unless their Air Pollution Control Systems are upgraded to Wet scrubber/ ESP	31.07.2023	30.11.2023

**BG Forfeiture History**

Srno.	Consent (C2E/C2O/C2R)	Amount of BG imposed	Submission Period	Purpose of BG	Amount of BG Forfeiture	Reason of BG Forfeiture
1	C to R	1000000	----	Towards compliance of Consent conditions & O & M of pollution control system.	500000	Exceedance of Source emission.

*Rangamp*





**SCHEDULE-IV**

**General Conditions:**

- 1 The applicant shall provide facility for collection of environmental samples and samples of trade and sewage effluents, air emissions and hazardous waste to the Board staff at the terminal or designated points and shall pay to the Board for the services rendered in this behalf.
- 2 The applicant shall provide ports in the chimney/(s) and facilities such as ladder, platform etc. for monitoring the air emissions and the same shall be open for inspection to/and for use of the Board's Staff. The chimney(s) vents attached to various sources of emission shall be designated by numbers such as S-1, S-2, etc. and these shall be painted/ displayed to facilitate identification.
- 3 Whenever due to any accident or other unforeseen act or even, such emissions occur or is apprehended to occur in excess of standards laid down, such information shall be forthwith Reported to Board, concerned Police Station, office of Directorate of Health Services, Department of Explosives, Inspectorate of Factories and Local Body. In case of failure of pollution control equipment, the production process connected to it shall be stopped.
- 4 The applicant shall provide an alternate electric power source sufficient to operate all pollution control facilities installed to maintain compliance with the terms and conditions of the consent. In the absence, the applicant shall stop, reduce or otherwise, control production to abide by terms and conditions of this consent.
- 5 The firm shall submit to this office, the 30th day of September every year, the Environmental Statement Report for the financial year ending 31st March in the prescribed Form-V as per the provisions of rule 14 of the Environment (Protection) (Second Amendment) Rules, 1992.
- 6 The industry should comply with the Hazardous & Other Wastes (M & TM) Rules, 2016 and submit the Annual Returns as per Rule 6(5) & 20(2) of Hazardous & Other Wastes (M & TM) Rules, 2016 for the preceding year April to March in Form-IV by 30th June of every year.
- 7 An inspection book shall be opened and made available to the Board's officers during their visit to the applicant.
- 8 The industry shall constitute an Environmental cell with qualified staff/personnel/agency to see the day to day compliance of consent condition towards Environment Protection.
- 9 The applicant shall install a separate meter showing the consumption of energy for operation of domestic and industrial effluent treatment plants and air pollution control system. A register showing consumption of chemicals used for treatment shall be maintained.
- 10 The applicant shall bring minimum 33% of the available open land under green coverage/ plantation. The applicant shall submit a yearly statement by 30th September every year on available open plot area, number of trees surviving as on 31st March of the year and number of trees planted by September end.
- 11 The industry shall submit official e-mail address and any change will be duly informed to the MPCB.
- 12 Industry should monitor effluent quality, stack emissions and ambient air quality monthly/quarterly.



*Aditi V. More*



- 13 The industry shall recycle/reprocess/reuse/recover Hazardous Waste as per the provision contain in the H&OW(M&TM) Rules 2016, which can be recycled/processed/ reused/ recovered and only waste which has to be incinerated shall go to incineration and waste which can be used for land filling and cannot be recycled/ reprocessed etc. should go for that purpose, in order to reduce load on incineration and landfill site/environment.
- 14 Industry shall strictly comply with the Water (P&CP) Act, 1974, Air (P&CP) Act,1981 and Environmental Protection Act,1986 and industry specific standard under EP Rules 1986 which are available on MPCB website(www.mpcb.gov.in).
- 15 Separate drainage system shall be provided for collection of trade and sewage effluents. Terminal manholes shall be provided at the end of the collection system with arrangement for measuring the flow. No effluent shall be admitted in the pipes/sewers downstream of the terminal manholes. No effluent shall find its way other than in designed and provided collection system.
- 16 Neither storm water nor discharge from other premises shall be allowed to mix with the effluents from the factory.
17. Conditions for D.G. Set
  - a) Noise from the D.G. Set should be controlled by providing an acoustic enclosure or by treating the room acoustically.
  - b) Industry should provide acoustic enclosure for control of noise. The acoustic enclosure/ acoustic treatment of the room should be designed for minimum 25 dB (A) insertion loss or for meeting the ambient noise standards, whichever is on higher side. A suitable exhaust muffler with insertion loss of 25 dB (A) shall also be provided. The measurement of insertion loss will be done at different points at 0.5 meters from acoustic enclosure/room and then average.
  - c) Industry should make efforts to bring down noise level due to DG set, outside industrial premises, within ambient noise requirements by proper siting and control measures.
  - d) Installation of DG Set must be strictly in compliance with recommendations of DG Set manufacturer.
  - e) A proper routine and preventive maintenance procedure for DG set should be set and followed in consultation with the DG manufacturer which would help to prevent noise levels of DG set from deteriorating with use.
  - f) D.G. Set shall be operated only in case of power failure.
  - g) The applicant should not cause any nuisance in the surrounding area due to operation of D.G. Set.
  - h) The applicant shall comply with the notification of MoEFCC, India on Environment (Protection) second Amendment Rules vide GSR 371(E) dated 17.05.2002 and its amendments regarding noise limit for generator sets run with diesel.
- 18 The industry should not cause any nuisance in surrounding area.
- 19 The industry shall take adequate measures for control of noise levels from its own sources within the premises so as to maintain ambient air quality standard in respect of noise to less than 75 dB (A) during day time and 70 dB (A) during night time. Day time is reckoned in between 6 a.m. and 10 p.m. and night time is reckoned between 10 p.m. and 6 a.m.
- 20 The applicant shall maintain good housekeeping.
- 21 The non-hazardous solid waste arising in the factory premises, sweepings, etc. be disposed of scientifically so as not to cause any nuisance / pollution. The applicant shall take necessary permissions from civic authorities for disposal of solid waste.
- 22 The applicant shall not change or alter the quantity, quality, the rate of discharge, temperature or the mode of the effluent/emissions or hazardous wastes or control equipment provided for without previous written permission of the Board. The industry will not carry out any activity, for which this consent has not been granted/without prior consent of the Board.



*Signature*



- 23 The industry shall ensure that fugitive emissions from the activity are controlled so as to maintain clean and safe environment in and around the factory premises.
- 24 The industry shall achieve the National Ambient Air Quality standards prescribed vide Government of India, Notification dtd. 16.11.2009 as amended.

*Aditi V. More*



**LAGOON**



**MECHANIZED SCREEN**



**OIL SKIMMER**



STP



ANAEROBIC BIO MEDIA FILTER



**SUGAR CPU REACTOR**



**SUGAR CPU FILTER UNIT**



**REQUEST PRAYER FOR  
RECONSIDERATION OF DIRECTION  
ISSUED UNDER SECTION 33A**

**SHRI DUTT INDIA PVT. LTD.  
(OPERATOR OF VASANTDADA S.S.S.K. LTD)  
SANGLI**





## Shri Dutt India Private Limited

(Operator of Vasantdada S.S.S.K. Ltd. Sangli)

Madhavnagar Road, Sangli - 416416. Tel. No. 9112688888, 9112788888

**THE MEMBER SECRETARY,**  
Maharashtra Pollution Control Board,  
Mumbai.

**Sub: -Request Prayer for Reconsideration of Section 33 A.**

**Respected Sir,**

This is with reference to the above mentioned subject . We would like to respectfully submit the following for your kind consideration: ---

- 1) SHRI DUTT INDIA PVT.LTD. is an industrial group, having establishments in Agro Industrial Sector. The group has Sugar Producing units, and as allied industry Ethanol Manufacturing, which contributes to limit foreign exchange spending of our country, by substituting crude oil import.
- 2) The group is presently running the **Sugar Factory division** of Vasantdada S.S.K. Ltd as '**OPERATOR**' to ensure due price to their member farmers.

Regd. Office : No. 205, Second Floor, P S Aviator, New Town Road,  
Alghora Chinar Park, Rajarhat, Kolkata WB 700136 India  
Email : office@shridutt.com, Tel.: 033 4005 1466 CIN : U15100WB2012PTC184651





## Shri Dutt India Private Limited

(Operator of Vasantdada S.S.S.K. Ltd. Sangali)

Madhavnagar Road, Sangli - 416416. Tel. No. 9112688888, 9112788888

3) Alongwith working of the production unit, equal attention is given to Environmental sembalance, and the group has ensured this by providing full fledged Effluent Treatment Plant comprising of Primary, Secondary, and Tertiary Treatment and scrupulously operating the same with vigil. We have taken care that at no point of time, our either untreated or treated effluent enters any water course and the treated effluent with characteristics within consented limits is disposed on the land reserved for irrigation of the same with no untoward effect observed. The above is supported by-

- A) Results of Online monitoring which is attached as **Annexure- I**
- B) Results of JVS samples, for the present crushing season 2022-2023, attached as **Annexure-II**

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Madhavnagar Road, Sangli - 416416. Tel. No. 9112688888, 9112788888

- 4) The Disposal of our treated effluent of quantity of about 450 cum is on land for irrigation under a special scheme named as "Rasulwadi Sambarwadi, wherein, the treated effluent from Karkhana is subjected to crop irrigation scheme of the farmers with a total acreage of about 55 Acres. This scheme and practice is continuing for past about 34 Years and **No untoward effect on the sugar cane crop of the farmers is observed** or reported. This is substantiated by the crop record for the irrigated area for last three years, attached as **Annexure III**.

Further, this land is about 4 KM away from Krishna River and therefore there is no possibility of this water reaching river.

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(Operator of Vasantdada S.S.S.K. Ltd. Sangli)

Madhavnagar Road, Sangli - 416416, Tel. No. 9112688888, 9112788888

- 5) **Since we do not have enough water to be fed to farmer's farms, there is and was never a question of letting out any water in any nalla, and for which, there is no provision in the first place.**
- 6) The mentioned leakage of untreated/partially treated pale yellow coloured effluent of alleged pH of about 5-6 could not be originated from our industry, since we have maintained treated parameters well within limits and we do not generate any pale yellow coloured treated effluent. Furthermore, all our untreated or treated effluent transfer is by pipeline only, and therefore, could not be entrained in any Nalla. At no point of time therefore, our untreated or treated effluent has caused the said pollution.
- 7) We have pointed out during the visit of officials that there was a leakage in the pipeline carrying Spentwash from adjoining distillery, and which we had pointed out to their management. However, some Spentwash, entered in adjoining natural drain meant for carrying rain water. Photograph to this effect, already submitted to your office, is attached as **Annexure IV**.
- 8) We have a valid Consent to Operate (Copy attached as **Annexure V**) and are scrupulously maintaining the stipulated conditions.

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## Shri Dutt India Private Limited

(Operator of Vasantdada S.S.S.K. Ltd. Sangali)

Madhavnagar Road, Sangli - 416416. Tel. No. 9112688888, 9112788888

- 9) We have already undertaken Upgradation Plan for our existing ETP to further increase the efficiency and the measures initiated are:-
- In Plant Control:- Fixing of Mechanized Screen, Sensor based recycles to minimize effluent volume & strength.**  
These measures shall reduce the quantity and concentration of effluent and shall be completed before start of next season.
  - We have already segregated the condensates and reusing the same after partial treatment. This system is being upgraded with addition of 'Nitrification', which shall polish it further.
  - We have initiated scrapping of excess quantity treated effluent containing storage lagoon, and the same shall be restricted to 15 days storage capacity, wherein, it shall be used for storing of treated effluent, during 'No Irrigation' period, as per stipulation from M.P.C.B.
  - We have always maintained the ETP and Disposal facility, with continuous monitoring by the Environmental Team.

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## Shri Dutt India Private Limited

(Operator of Vasantdada S.S.S.K. Ltd. Sangli)

Madhavnagar Road, Sangli - 416416, Tel. No. 9112688888, 9112788888

The foregoing clearly reveals our intention of not causing pollution willfully, and we have always abided by guidelines from M.P.C.B. We would like to respectfully submit the following for your kind consideration:-

A) Neither we have a provision/arrangement for discharge of untreated/treated effluent in outside environment, nor have we intentionally done it at any time, during all these years of operation.

B) We also would like to highlight our record for effluent treatment, which is supported by both online monitoring and also the vigilance sample results.

C) That there is no untoward effect on crop due to disposal, which is depicted by increased yield for the crop area irrigated.

D) We have always abided by your directions, and promptly closed operation of our ongoing crushing season, on receiving instructions from your office.

Regd. Office : No. 205, Second Floor, P S Aviator, New Town Road,  
Atghora Chinar Park, Rajarhat, Kolkata WB 700136 India

Email : office@shridutt.com, Tel.: 033 4005 1466 CIN : U15100WB2012PTC184651





## Shri Dutt India Private Limited

(Operator of Vasantdada S.S.S.K. Ltd. Sangali)

Madhavnagar Road, Sangli - 416416. Tel. No. 9112688888, 9112788888

We therefore request you to review our case in the above light, and request you to reconsider the action taken under section 33A, and grant us permission for restarting the production at the unit. We are running this Sugar factory, which benefits thousands of Farmers, who get due, price for their cultivation and have always maintained stipulated conditions with guidance from visiting officials and followed them in TOTO.

We on our part shall assure you of our Best Efforts for betterment of Environmental Management Systems.

Thanking You in Anticipation

Yours Faithfully

For Shri Dutt India Pvt. Ltd.

Regd. Office : No. 205, Second Floor, P S Aviator, New Town Road,  
Atghora Chinar Park, Rajarhat, Kolkata WB 700136 India  
Email : oifce@shridutt.com, Tel.: 033 4005 1466 CIN : U15100WB2012PTC184651



### ● **SALIENT POINTS FOR CONSIDERATION**

- ✱ In view of difficulties faced by surrounding farmers, due to working financial difficulties of M/S Vasantdada S.S.K. Ltd., Shri Dutt India Pvt. Ltd. has taken the lead for effective working of the sugar factory ,thereby, enabling proper price for sugar cane for member farmers.
- ✱ The Factory is effectively working for past 6 years and with proper management practices, the production as well as environmental sem balance is maintained.
- ✱ Due to accidental failure of pipeline carrying Spent wash from adjoining distillery, which lead to natural drain near our sugar factory, pollution of water resources occurred.
- ✱ **HOWEVER ,IT IS SUBMITTED THAT THERE WAS NO INVOLVEMENT OF ANY OF OUR EFFLUENT STREAMS WHICH DID NOT CONTRIBUTE TO THIS OCCURANCE.**



## Annexure - I


**● AVERAGE ANALYSIS RESULTS OF ONLINE MONITORING SYSTEM**

Month	COD (mg/l)	BOD (mg/l)	TSS (mg/l)	FLOW (m <sup>3</sup> /hr)	pH
January	78.15	27.42	23.59	28.50	7.16
February	71.95	21.86	24.82	27.15	7.41
March	68.40	22.38	23.76	24.65	7.34



## Annexure - II

● ANALYSIS REPORTS OF JVS SAMPLES

<b>MAHARASHTRA POLLUTION CONTROL BOARD REGIONAL LABORATORY, CHIPLUN</b>					
Phone no. : 02355-261970 Visit us at : <a href="http://mpcbb.gov.in">http://mpcbb.gov.in</a> mail : <a href="mailto:mpcbb@chiplunlab@mpcbb.gov.in">mpcbb@chiplunlab@mpcbb.gov.in</a>		 "Your Service is our Duty"		Regional Laboratory, Chiplun, Maharashtra Pollution Control Board, 105,106 Parkar Complex, 1st Floor, Behind Nagar Parishad, Chiplun, Dist Ratnagiri. 415 805	
SABL Certificate No.:			Validity:		
Laboratory MofF Recognition :			Validity:		
Test Report No.: MPCB/RL-Chiplun JVS/22-23/01/27			Date: 18/01/2023 02:56 PM		
<b>Analysis Report-Water (JVS)</b>					
Field Sample ID :		BR-0033125			
Name & Address of the Industry		Shri Dutt India Pvt. Ltd (Operator of M/s. Vasantdada Shetkar Sahakar Sakhar Karakhana Ltd.) Sangli R12 Sugar ( including Khandari)			
Sampling Location :		ETP (Outlet)			
Lab code :		MPCB/RL-Chiplun JVS/22-23/1142			
Sampling Methods :		Sample Details (W ater/Air/IIW) :		Water	
Sampling drawn by (Officer name):		Sample Volume Received :			
Sample submitted by (Name) :		Seal No. :		173	
Date of Sample Collection (dd/mm/yyyy) :		Date of Sample receipt to Laboratory (dd/mm/yyyy) :		07/12/2022 04:52 PM	
Analysis start Date (dd/mm/yyyy) :		08/12/2022 11:49 AM			
<b>Test Report</b>					
Sr.No	Parameter	Result	Unit	Method Adopted	ML (if required)
1	pH	8.2			
2	Total Dissolved Solids(TDS)	547	mg/l		
3	Suspended Solids (SS)	170	mg/l		
4	Biological Oxygen Demand (BOD)	6.0	mg/l		



## ● ANALYSIS REPORTS OF JVS SAMPLES

Sr.No	Parameter	Result	Limit	Method Adopted	ML (if required)
5	Chloride	65.38	mg/l		
6	Chemical Oxygen Demand (COD)	52.0	mg/l		
7	Sulphate	97.35	mg/l		
8	Oil & Grease	BDL	mg/l		

End of The Report

Abbreviations: - BDL=Below Detectable limit, N.D=Not Detected, N.A=Not Analyzed, \* Not covered under NABL scope

Comment (if any):  
 Comment for Attached Report:  
 Remarks:- Note: This test report refers only to the sample submitted for the testing.  
 Results Compiled by: Anil N. Sandasing  
 Results Approved by: Anil N. Sandasing  
 Results Reviewed by: Anil N. Sandasing

Anil N. Sandasing  
 I.e. Scientific Officer,  
 Regional Laboratory,  
 Chiplun.

\* This is an Electronically generated report does not require signature

---


Note

1. Results relate only to the sample tested, only in case of samples submitted by customer & not drawn by MPCB
2. \* indicates parameters are not in scope of NABL: ISO:17025:2017
3. Samples will be preserved for a period 10 days from the delivery of Test Certificate.
4. Customer complaint register is available at Laboratory.
5. The Contents of this Report shall not be reproduced in part or in full without written approval of Laboratory.
6. ML values will be reported on request.

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## ANALYSIS REPORTS OF JVS SAMPLES

<b>MAHARASHTRA POLLUTION CONTROL BOARD REGIONAL LABORATORY, CHIPLUN</b>					
Phone no. : 02355-281470 Visit us at : <a href="http://mpcb.gov.in">http://mpcb.gov.in</a> mail : <a href="mailto:mpcb@iplunlab&amp;mpcb.gov.in">mpcb@iplunlab&amp;mpcb.gov.in</a>		 "Your Service is our Duty"		Regional Laboratory, Chiplun, Maharashtra Pollution Control Board, 1/5, 1/6 Parkar Complex, 1st Floor, Bhind Nagar Parishad, Chiplun, Dist Ratnagiri - 415 605	
NABL Certificate No.:			Validity		
Laboratory NABL Recognition :			Validity		
Test Report No. : MPCB/RL-Chiplun/JVS/22-23/02-187			Date: 02/02/2023 07:18 PM		
<b>Analysis Report-Water (JVS)</b>					
Field Sample ID :		BR-0038225			
Name & Address of the Industry		Shri Datt India Pvt Ltd (Operator of M/s. Vasandala Sherkari Sahakari Sakhar Karakhana Ltd.) Sangli R12 Sugar (excluding Khandsari)			
Sampling Location :		ETP (Outlet)			
Lab code :		MPCB/RL-Chiplun/JVS/22-23/1388			
Sampling Methods :		Sample Details (Water, Air, etc.) :		Water	
Sampling drawn by (Officer name):		FO-Sangli (Shri. Rohidas R. Markar)		Sample Volume Received :	
Sample submitted by (Name) :		FO-Sangli (Shri. Rohidas R. Markar) (SRO-Sangli)		Seal No. : 173	
Date of Sample Collection (dd/mm/yyyy) :		31/12/2022 11:50 AM		Date of Sample receipt to Laboratory (dd/mm/yyyy) :	
Analysis start Date (dd/mm/yyyy) :		06/01/2023 04:27 PM		06/01/2023 03:28 PM	
<b>Test Report</b>					
Sr.No	Parameter	Results	Unit	Method Adopted	MU (If required)
1	pH	6.9			
2	Total Dissolved Solids (TDS)	491.0	mg/l		
3	Suspended Solids (SS)	46.0	mg/l		
4	Biochemical Oxygen Demand (BOD)	69.0	mg/l		



## ● ANALYSIS REPORTS OF JVS SAMPLES

Sr.No	Parameter	Results	Unit	Method Adopted	ML (if required)
5	Chloride	56.88	mg/l		
6	Chemical Oxygen Demand (COD)	183.2	mg/l		
7	Sulphate	45.80	mg/l		
8	Oil & Grease	BDL	mg/l		

**End of The Report**

Abbreviations: - BDL=Below Detectable limit, N D=Not Detected, N A= Not Analyzed, \* Not covered under NABL scope

**Comment (if any):**  
**Comment for Amended Report:**  
**Remark:** - Note: This test report refers only to the sample submitted for the testing.  
**Results Compiled by:** Anil N. Sandansing  
**Results Approved by:** Anil N. Sandansing  
**Results Reviewed by:** Anil N. Sandansing

Anil N Sandansing  
 U. Scientific Officer,  
 Regional Laboratory,  
 Chiplun.

*\* This is an Electronically generated report does not require signature*


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**Note:**  
 1. Results relate only to the sample tested, only in case of samples submitted by customer & not drawn by MPCB  
 2. \* indicates parameters are not in scope of NABL ISO 17025:2017  
 3. Samples will be preserved for a period 30 days from the delivery of Test Certificate  
 4. Customer complaint register is available at laboratory  
 5. The Contents of this Report shall not be reproduced in part or in full without written approval of laboratory  
 6. ML values will be reported on request

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## ● ANALYSIS REPORTS OF JVS SAMPLES

MAHARASHTRA POLLUTION CONTROL BOARD REGIONAL LABORATORY, CHIPLUN					
Phone no.: 02355-261970 Visit us at : <a href="http://mpcb.gov.in">http://mpcb.gov.in</a> Email : <a href="mailto:mpcbchiplun@mpcb.gov.in">mpcbchiplun@mpcb.gov.in</a>		 "Your Service is our Duty"		Regional Laboratory, Chiplun, Maharashtra Pollution Control Board, 105/106 Parkar Complex, 1st Floor, Bhind Nagar Parishad, Chiplun, Dist. Ratnagiri. 415 605	
NABL Certificate No.:			Validity:		
Laboratory MoEF Recognition :			Validity:		
Test Report No.: MPCB RL-Chiplun JVS/22-23/03-269			Date: 23/03/2023 02:28 PM		
<b>Analysis Report-Water (JVS)</b>					
Field Sample ID :	HR-0040110				
Name & Address of the Industry :	Shri Dutt India Pvt. Ltd ( Operator of NE's Vasantdada Shetkari Sahakar Sakhar Karakhana Ltd.) Sangli R 12 Sugar ( including Khambhan)				
Sampling Location :	ETP (Outlet)				
Lab code :	MPCB/RL-Chiplun JVS/22-23/1613				
Sampling Methods :		Sample Details (Water/Air/HW) :	Water		
Sampling drawn by (Officer name) :	FO-Sangli (Shri. Rohidas R. Markar)	Sample Volume Received :			
Sample submitted by (Name) :	FO-Sangli (Shri. Rohidas R. Markar (SRO-Sangli)	Seal No. :	J#3		
Date of Sample Collection (dd/mm/yyyy) :	27/01/2023 01:05 PM	Date of Sample receipt to Laboratory (dd/mm/yyyy) :	02/02/2023 04:14 PM		
Analysis start Date (dd/mm/yyyy) :	06/02/2023 11:49 AM				
<b>Test Report</b>					
Sr.No	Parameter	Result	Unit	Method Adopted	ML (if required)
1	pH	7.0			
2	Total Dissolved Solids(TDS)	431.0	mg/l		
3	Suspended Solids (SS)	19.0	mg/l		
4	Biochemical Oxygen Demand (BOD)	64.0	mg/l		

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## ● ANALYSIS REPORTS OF JVS SAMPLES

Sr.No	Parameter	Results	Unit	Method Adopted	ML (If required)
5	Chloride	59.35	mg/l		
6	Chemical Oxygen Demand (COD)	192.0	mg/l		
7	Sulphate	33.39	mg/l		
8	Oil & Grease	BDL	mg/l		

End of The Report

Abbreviations: - BDL=Below Detectable limit, N.D.=Not Detected, N.A.= Not Analyzed, \* Not covered under NABL scope

Comment (If any):  
 Comment for Amended Report:  
 Remark: - Note: This test report refers only to the sample submitted for the testing.  
 Results Compiled by: Anil N. Sandansing  
 Results Approved by: Anil N. Sandansing  
 Results Reviewed by: Anil N. Sandansing

Anil N. Sandansing  
 I/c Scientific Officer,  
 Regional Laboratory,  
 Chiplun.

*\* This is an Electronically generated report does not require signature*

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Note

1. Results relate only to the sample tested, only in case of samples submitted by customer & not drawn by MPCB
2. \* indicates parameters are not in scope of NABL ISO 17025:2017.
3. Samples will be preserved for a period 10 days from the delivery of Test Certificate
4. Customer complaint registers available at laboratory
5. The Contents of this Report shall not be reproduced in part or in full without written approval of laboratory
6. ML values will be reported on request

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**Annexure - III****● CANE YIELD IN CRUSHING SEASON- RUSULAWADI SAMBARWADI.**

<b>CRUSHING SEASON</b>	<b>TOTAL CANE CROP IN MT</b>
2020-21	3485
2021-22	3966
2022-23	4430




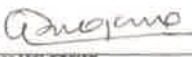
**Annexure - IV**

● **SPENTWASH LINE LEAKAGE**



# M.P.C.B. CONSENT

## Annexure - V

MAHARASHTRA POLLUTION CONTROL BOARD																							
Tel: 24010706/24010437 Fax: 24023816 Website: <a href="http://mpcb.gov.in">http://mpcb.gov.in</a> Email: cac-cat@mpcb.gov.in																							
		Kajpetaru Point, 2nd and 6th floor, Opp. Cine Planet Cinema, Near Sion Circle, Sion (E), Mumbai-400022																					
No:- Format1.0/CAC/UAN No.MPCB-CONSENT-0000092842/CR - 2011000172		Date: 04/11/2020																					
To, Shri Dutt India Pvt. Ltd. (Operator of M/s. Vasantdada Shetkari Sahakari Sakhar Karkhana Ltd), 173/156/167/188,A/P - Madhavnagar Road, Mira,Sangli.																							
Sub: Renewal of 7500 TCD sugar unit. Under M.S.I RED Category																							
Ref: 1. Renewal of consent granted by the Board vide no. CAC/UAN NO. MPCB-CONSENT-0000076217/CR-2002001163 dtd. 26.02.2020. 2. Minutes of CAC Meeting dtd. 11.09.2020																							
Your application No.MPCB-CONSENT-0000092842 Dated 30.06.2020 For: grant of Consent to Renewal under Section 26 of the Water (Prevention & Control of Pollution) Act, 1974 & under Section 21 of the Air (Prevention & Control of Pollution) Act, 1981 and Authorization under Rule 6 of the Hazardous & Other Wastes (Management & Transboundary Movement) Rules 2016 is considered and the consent is hereby granted subject to the following terms and conditions and as detailed in the schedule I, II, III & IV annexed to this order:																							
1. The Consent to Renewal is granted upto: 31.07.2023																							
2. The capital investment of the industry is Rs.280.6229 Crs. (As per C.A Certificate submitted by industry).																							
3. Consent is valid for the manufacture of:																							
<table border="1"> <thead> <tr> <th>Sr No</th> <th>Product</th> <th>Maximum Quantity</th> <th>UOM</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Sugar</td> <td>28125</td> <td>MT/M</td> </tr> <tr> <td>2</td> <td>Molasses</td> <td>9000</td> <td>MT/M</td> </tr> <tr> <td>3</td> <td>Bagasses</td> <td>52217</td> <td>MT/M</td> </tr> <tr> <td>4</td> <td>Pressmud</td> <td>7800</td> <td>MT/M</td> </tr> </tbody> </table>				Sr No	Product	Maximum Quantity	UOM	1	Sugar	28125	MT/M	2	Molasses	9000	MT/M	3	Bagasses	52217	MT/M	4	Pressmud	7800	MT/M
Sr No	Product	Maximum Quantity	UOM																				
1	Sugar	28125	MT/M																				
2	Molasses	9000	MT/M																				
3	Bagasses	52217	MT/M																				
4	Pressmud	7800	MT/M																				
The Cane crushing capacity of Sugar unit shall not exceed 7500 TCD																							
4. Conditions under Water (P&CP) Act, 1974 for discharge of effluent:																							
<table border="1"> <thead> <tr> <th>Sr No</th> <th>Description</th> <th>Permitted in CMD</th> <th>Standards to</th> <th>Disposal</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Trade effluent</td> <td>750</td> <td>As per Schedule - I</td> <td>On land for Irrigation</td> </tr> <tr> <td>2.</td> <td>Domestic effluent</td> <td>40</td> <td>As per Schedule - I</td> <td>onland for gardening / Irrigation</td> </tr> </tbody> </table>				Sr No	Description	Permitted in CMD	Standards to	Disposal	1.	Trade effluent	750	As per Schedule - I	On land for Irrigation	2.	Domestic effluent	40	As per Schedule - I	onland for gardening / Irrigation					
Sr No	Description	Permitted in CMD	Standards to	Disposal																			
1.	Trade effluent	750	As per Schedule - I	On land for Irrigation																			
2.	Domestic effluent	40	As per Schedule - I	onland for gardening / Irrigation																			
																							
<small>Shri Dutt India Pvt. Ltd. (Operator of M/s. Vasantdada Shetkari Sahakari Sakhar Karkhana Ltd),C/UA No.MPCB-CONSENT-0000092842</small>																							
Page 1 of 11																							



## M.P.C.B. CONSENT

### 5. Conditions under the Air (P&CP) Act, 1981 for air emissions:

Stack No.	Description of stack / source	Number of Stack	Standards to be achieved
1	Boiler No. 1, 2 & 3	1	As per Schedule -II
2	Boiler No. 4 & 5	1	As per Schedule -II
3	Boiler No. 6, 7 & 8	1	As per Schedule -II

### 6. Conditions about Non Hazardous Wastes:

Sr No.	Type of Waste	Quantity	UoM	Treatment	Disposal
1	Boiler Ash	3013	MT/A	NA	Sale to Bricks Manufactures
2	ETP Sludge	10	MT/A	NA	Used as Manure

### 7. Conditions under Hazardous & Other Wastes (M & T M) Rules 2008 for treatment and disposal of hazardous waste:


Sr No.	Type of Waste	HW Category.	Quantity & UoM	Treatment	Disposal
1	5.1 Used or spent oil	5.1	2 MT/A	Recycle	Sale to authorized recycler

The applicant shall ensure disposal to the Actual user having permissions under Rule 9 of Hazardous and other Waste (M & TM) Rules, 2016.

a. The applicant shall properly collect, transport & regularly dispose of the hazardous waste to CHWTSDF, in compliance of the Hazardous & Other Wastes (Management & Transboundary Movement) Rules, 2016 and keep proper manifest thereof.

8. The Board reserves the right to review, amend, suspend, revoke etc. this consent and the same shall be binding on the industry.
9. This consent should not be construed as exemption from obtaining necessary NOC/permission from any other Government authorities.
10. Industry shall connect online CMS data as per CPCB guidelines to CPCB & MPCB Servers.
11. This consent is issued as per the Consent Appraisal Committee meeting dated 11.09.2020.
12. To improve water economy, PP shall submit detail water budget along with proposal towards recycling of treated effluent to the maximum extent including excess condensate into the process to reduce fresh water consumption, within a period of 3 months with activity bar chart
13. As JVS of source emission are exceeding, PP shall submit adequacy report of Air pollution control systems with improvement plan for O & M within period of 2 months
14. The applicant shall make an application for renewal of the consent at least 60 days before the date of the expiry of the consent.

For and on behalf of the  
Maharashtra Pollution Control Board.



(Ashok Shingare IAS),  
Member Secretary



## ● M.P.C.B. CONSENT

Received Consent fee of -				
Sr. No.	Amount (Rs.)	Transaction/DR. No.	Date	Transaction Type
1	1683737.00	TXN2006001834	30/06/2020	Online Payment

**Copy to:**

1. Regional Officer, MPCB, Kolhapur and Sub-Regional Officer, MPCB, Sangli  
 - They are directed to ensure the compliance of the consent conditions.  
 - They are directed to forfeit the bank guarantee of Rs.5 Lakh & obtain top up BG of Rs. 15 Lakh from the industry
2. Chief Accounts Officer, MPCB, Sion, Mumbai
3. CC/CAC desk - for record & website updation purposes.

*Aditya V. More*

MPCB

SHRI DUTY BILL'S PVT. LTD. (Operator of M/S. Vasantibai Shukkar Sahakar Sakhar Karkhana Ltd), CRUWAN  
 No.MPCB-CONSENT-000002542

Page 3 of 11



## M.P.C.B. CONSENT

### SCHEDULE-I

Terms & conditions for compliance of Water Pollution Control:

- 1) **A] As per your application, you have Provided Effluent Treatment Plant (ETP) of designed capacity of 1000.00 CMD consisting of Primary, Secondary, Tertiary for the treatment of 750.00 CMD industrial effluent**
- B] The Applicant shall operate the effluent treatment plant (ETP) to treat the trade effluent so as to achieve the following standards prescribed by the Board or under EP Act, 1986 and Rules made there under from time to time, whichever is stringent.**

Sr. No.	Parameters	Limiting concentration not to exceed in mg/l, except for pH
(1)	pH	5.5-9.0
(2)	Oil & Grease	10
(3)	BOD (3 days 27°)	100
(4)	Sulphate	1000
(5)	Suspended Solids	100
(6)	COD	250
(7)	Chloride	600
(8)	Total Dissolved Solids	2100

**C] The treated effluent 750.00 CMD shall be disposed on land for irrigation on 22.25 hectares of own land /as per the bilateral agreement with farmers. In no any case treated/untreated effluent shall find its way outside the factory premises directly or indirectly.**

**D] Trade effluent of 0.00 CMD generated from Co-gen shall be 100% recycle in process.**

**E] CREP conditions for Sugar Factory**

- i. Operation of ETP shall be started at least one month before starting of cane crushing to achieve desired MLSS. So as to meet prescribed standards from day one the operation of mill.
- ii. Waste water generation shall be reduced to 100 liters per tone of cane crushed.
- iii. Industry shall achieve zero discharge into in land surface water bodies.
- iv. 15 days' storage capacity tank shall be provided for treated effluent to take care during no demand for irrigation.

**F] Industry to make necessary arrangement to cover the effluent collection system and to avoid the ingress of Bagasse and other material.**

**G] The unit shall operate ETP even after completion of the crushing season so that any effluent generated during washing & maintenance activity is to be discharged after proper treatment.**

**H] The unit shall optimize water use in Industrial process & maintain records.**

*Adeganie*



## M.P.C.B. CONSENT

2) A) As per your application, you have provided septic tank and soak pit for the treatment of 40.00 CMD sewage.

B) The applicant shall operate sewage treatment system to treat sewage so as to achieve the following standards/ prescribed under EP Act 1986 and rules made under time to time, whichever is stringent.

1	Suspended Solids	Not to exceed	100 mg/l
2	BOD 3 days (27°C)	Not to exceed	100 mg/l

C) The treated sewage shall be 100% reused/recycled for gardening purpose within premise. In no any case, sewage shall find its way outside Company's premises.

3) The industry shall have bilateral agreement with the farmers on whose land the treated effluent is used for irrigation purposes and a copy of the agreements with validity shall be submitted to the Regional/Sub-Regional Office of the Board.

4) The industry shall create Environmental Cell by appointing an Environmental Engineer, Chemist and Agriculture expert for looking after day to day activities related to Environment and Irrigation field where treated effluent is used for Irrigation.

5) CONDITIONS FOR MOLASSES STORAGE:

(i) The molasses shall be properly collected and stored in steel tanks which shall be leak proof. At no stage of handling of molasses, there shall be leakage or spillage.

(ii) The capacity of tanks for storage of molasses shall be such that it will take care of bumper production of sugar, non-lifting of molasses etc.

(iii) All the area on which molasses are stored and handled should be provided with drain for diverting the spills to the treatment plant/ molasses tank. Suitable arrangements for accidental discharges of molasses from the tanks shall be provided to contain the same within factory premises.

(iv) Destruction of molasses and its disposal shall not be done without specific permission in writing from the authorized officer of the Board. Intimation of intention to destroy or dispose of the molasses shall be given to the Board at least 15 (fifteen) days in advance by registered post under intimation to the Sub-Regional officer and Regional officer of the Board under whose jurisdiction the factory is situated.

(v) The storage tanks shall be kept in good conditions all the year round with adequate maintenance. The tanks size and capacity per cm, height, total capacity in tonnes shall be displayed prominently near /on the tank.

(vi) The above conditions shall be in addition to and not in derogation of the provisions contained in the "Bombay Molasses Rules, 1955" and "Maharashtra Molasses Storage and Supply Regulation, 1965".

6) The Applicant shall provide Specific Water Pollution control system as per the conditions of EP Act, 1986 and rule made there under from time to time/ Environmental Clearance / CREP guidelines if applicable.

7) The Board reserves its rights to review plans, specifications or other data relating to plant setup for the treatment of waterworks for the purification thereof & the system for the disposal of sewage or trade effluent or in connection with the grant of any consent conditions. The Applicant shall obtain prior consent of the Board to take steps to establish the unit or establish any treatment and disposal system or an extension or addition thereto.

*Adugane*



## M.P.C.B. CONSENT

- 8) The Industry shall ensure replacement of pollution control system or its parts after expiry of its expected life as defined by manufacturer so as to ensure the compliance of standards and safety of the operation thereof.
- 9) The Applicant shall comply with the provisions of the Water (Prevention & Control of Pollution) Act, 1974 and as amended, by installing water meters, and other provisions as contained in the said act:

Sr. No.	Purpose for water consumed	Water consumption quantity (CMD)
1.	Industrial Cooling, spraying in mine pits or boiler feed	250.00
2.	Domestic purpose	50.00
3.	Processing whereby water gets polluted & pollutants are easily biodegradable	800.00
4.	Processing whereby water gets polluted & pollutants are not easily biodegradable and are toxic	0.00
5.	Landening	0

- 10) The Applicant shall provide Specific Water Pollution control system as per the conditions of EP Act, 1986 and rule made there under from time to time/ Environmental Clearance/ CREP guidelines.

*Anugamo*



## M.P.C.B. CONSENT

### SCHEDULE-II

#### Terms & conditions for compliance of Air Pollution Control:

- 1) As per your application, you have provided the Air pollution control (APC) system and erected following stack(s) and observe the following fuel pattern-

Stack No.	Stack Attached To	APC System	Height in Mtrs.	Type of Fuel	Quantity & UoM	S%	SO <sub>2</sub>
1	Boiler No. 1, 2 & 3	Venture Wet Scrubber	42	Bagasses	540 MT/Day	0.20	2160.00
2	Boiler No. 4 & 5	Venture Wet Scrubber	62	Bagasses	480 MT/Day	0.20	1920.00
3	Boiler No. 6, 7 & 8	Venture Wet Scrubber	72	Bagasses	840 MT/Day	0.20	3360.00

- 2) The Applicant shall provide Specific Air Pollution control equipments as per the conditions of EP Act, 1986 and rule made there under from time to time/ Environmental Clearance / CREP guidelines.

1) The Applicant shall provide ESP/ Bag filter/ Wet scrubber to the Bagasse fired boiler and Dust Collector to Sugar bagging section as an Air Pollution control equipments OR as per the conditions of EP Act, 1986 and rule made there under from time to time / Environmental Clearance / CREP guidelines.

2) The applicant shall operate and maintain above mentioned air pollution control system, so as to achieve the level of pollutants to the following standards:

Total Particulate matter	Not to exceed	50 mg/Nm <sup>3</sup>
--------------------------	---------------	-----------------------

3) The Applicant shall obtain necessary prior permission for providing additional control equipment with necessary specifications and operation thereof or alteration or replacement/alteration well before its life come to an end or erection of new pollution control equipment.

4) The Board reserves its rights to vary all or any of the condition in the consent, if due to any technological improvement or otherwise such variation (including the change of any control equipment, other in whole or in part is necessary).

5) Industry should not use auxiliary fuel more than 15 % (as per amendment in EIA Notification 2009, power plant upto 15 MW based on Bio-mass and using auxiliary fuel as coal upto 15% are exempt.) as co-gen capacity is below 15 MW.

3) The Applicant shall obtain necessary prior permission for providing additional control equipment with necessary specifications and operation thereof or alteration or replacement/alteration well before its life come to an end or erection of new pollution control equipment.

4) The Board reserves its rights to vary all or any of the condition in the consent, if due to any technological improvement or otherwise such variation (including the change of any control equipment, other in whole or in part is necessary).

*Rangam*



## ● M.P.C.B. CONSENT

**SCHEDULE-III**  
**Details of Bank Guarantees:**

Sr. No.	Consent (C/E/C 20/C2R)	Amt of BG Imposed	Submission Period	Purpose of BG	Compliance Period	Validity Date
1	C to R	1500000	15 days/extended	Towards compliance of Consent conditions & O & M of pollution control system.	31.07.2023	30.11.2023
2	C to R	500000	15 days/extended	Industry shall not operate stand by Boilers (3 nos.) unless their Air Pollution Control Systems are upgraded to Wet scrubber/ ESP	31.07.2023	30.11.2023

**BG Forfeiture History**

Srno.	Consent (C20/C20/C2R)	Amount of BG Imposed	Submission Period	Purpose of BG	Amount of BG Forfeiture	Reason of BG Forfeiture
1	C to R	1000000	—	Towards compliance of Consent conditions & O & M of pollution control system.	500000	Exceedance of Source emission.

*Signature*

Sri Dutt India PVE. Ltd. (Operator of M/L. Vasantnagar Shikhar Sahakar Karkhana Ltd), CR/UM/ No.MPCB-CONSENT-0000092842

Page 8 of 11



## ● M.P.C.B. CONSENT

### SCHEDULE-IV

#### General Conditions:

- 1 The applicant shall provide facility for collection of environmental samples and samples of trade and sewage effluents, air emissions and hazardous waste to the Board staff at the terminal or designated points and shall pay to the Board for the services rendered in this behalf.
- 2 The applicant shall provide ports in the chimney(s) and facilities such as ladder, platform etc. for monitoring the air emissions and the same shall be open for inspection to/and for use of the Board's Staff. The chimney(s) vents attached to various sources of emission shall be designated by numbers such as S-1, S-2, etc. and these shall be painted/ displayed to facilitate identification.
- 3 Whenever due to any accident or other unforeseen act or even, such emissions occur or is apprehended to occur in excess of standards laid down, such information shall be forthwith Reported to Board, concerned Police Station, office of Directorate of Health Services, Department of Explosives, Inspectorate of Factories and Local Body. In case of failure of pollution control equipment, the production process connected to it shall be stopped.
- 4 The applicant shall provide an alternate electric power source sufficient to operate all pollution control facilities installed to maintain compliance with the terms and conditions of the consent. In the absence, the applicant shall stop, reduce or otherwise, control production to abide by terms and conditions of this consent.
- 5 The firm shall submit to this office, the 30th day of September every year, the Environmental Statement Report for the financial year ending 31st March in the prescribed Form-V as per the provisions of rule 14 of the Environment (Protection) (Second Amendment) Rules, 1992.
- 6 The industry should comply with the Hazardous & Other Wastes (M & TM) Rules, 2016 and submit the Annual Returns as per Rule 6(5) & 20(2) of Hazardous & Other Wastes (M & TM) Rules, 2016 for the preceding year April to March in Form-IV by 30th June of every year.
- 7 An inspection book shall be opened and made available to the Board's officers during their visit to the applicant.
- 8 The industry shall constitute an Environmental cell with qualified staff/personnel/agency to see the day to day compliance of consent condition towards Environment Protection.
- 9 The applicant shall install a separate meter showing the consumption of energy for operation of domestic and industrial effluent treatment plants and air pollution control system. A register showing consumption of chemicals used for treatment shall be maintained.
- 10 The applicant shall bring minimum 33% of the available open land under green coverage/ plantation. The applicant shall submit a yearly statement by 30th September every year on available open plot area, number of trees surviving as on 31st March of the year and number of trees planted by September end.
- 11 The industry shall submit official e-mail address and any change will be duly informed to the MPCB.
- 12 Industry should monitor effluent quality, stack emissions and ambient air quality monthly/quarterly.

*Adugamp*



## M.P.C.B. CONSENT

- 13 The industry shall recycle/reprocess/reuse/recover Hazardous Waste as per the provision contain in the H&OW(M&TM) Rules 2016, which can be recycled/processed/ reused/ recovered and only waste which has to be incinerated shall go to incineration and waste which can be used for land filling and cannot be recycled/ reprocessed etc. should go for that purpose, in order to reduce load on incineration and landfill site/environment.
- 14 Industry shall strictly comply with the Water (P&CP) Act, 1974, Air (P&CP) Act, 1981 and Environmental Protection Act, 1986 and Industry specific standard under EP Rules 1986 which are available on MPCB website(www.mpcb.gov.in).
- 15 Separate drainage system shall be provided for collection of trade and sewage effluents. Terminal manholes shall be provided at the end of the collection system with arrangement for measuring the flow. No effluent shall be admitted in the pipes/sewers downstream of the terminal manholes. No effluent shall find its way other than in designed and provided collection system.
- 16 Neither storm water nor discharge from other premises shall be allowed to mix with the effluents from the factory.
- 17 Conditions for D.G Set
  - a) Noise from the D.G Set should be controlled by providing an acoustic enclosure or by treating the room acoustically.
  - b) Industry should provide acoustic enclosure for control of noise. The acoustic enclosure/ acoustic treatment of the room should be designed for minimum 25 dB (A) insertion loss or for meeting the ambient noise standards, whichever is on higher side. A suitable exhaust muffler with insertion loss of 25 dB (A) shall also be provided. The measurement of insertion loss will be done at different points at 0.5 meters from acoustic enclosure/room and then average.
  - c) Industry should make efforts to bring down noise level due to DG set, outside industrial premises, within ambient noise requirements by proper siting and control measures.
  - d) Installation of DG Set must be strictly in compliance with recommendations of DG Set manufacturer.
  - e) A proper routine and preventive maintenance procedure for DG set should be set and followed in consultation with the DG manufacturer which would help to prevent noise levels of DG set from deteriorating with use.
  - f) D.G Set shall be operated only in case of power failure.
  - g) The applicant should not cause any nuisance in the surrounding area due to operation of D.G. Set.
  - h) The applicant shall comply with the notification of MoEFCC, India on Environment (Protection) second Amendment Rules vide GSR 371(E) dated 17.05 2002 and its amendments regarding noise limit for generator sets run with diesel.
- 18 The industry should not cause any nuisance in surrounding area.
- 19 The industry shall take adequate measures for control of noise levels from its own sources within the premises so as to maintain ambient air quality standard in respect of noise to less than 75 dB (A) during day time and 70 dB (A) during night time. Day time is reckoned in between 6 a.m. and 10 p.m. and night time is reckoned between 10 p.m. and 6 a.m.
- 20 The applicant shall maintain good housekeeping.
- 21 The non-hazardous solid waste arising in the factory premises, sweepings, etc. be disposed of scientifically so as not to cause any nuisance / pollution. The applicant shall take necessary permissions from civic authorities for disposal of solid waste.
- 22 The applicant shall not change or alter the quantity, quality, the rate of discharge, temperature or the mode of the effluent/emissions or hazardous wastes or control equipment provided for without previous written permission of the Board. The industry will not carry out any activity, for which this consent has not been granted/without prior consent of the Board.

*Prakash*



### ● M.P.C.B. CONSENT

- 23 The industry shall ensure that fugitive emissions from the activity are controlled so as to maintain clean and safe environment in and around the factory premises.
- 24 The industry shall achieve the National Ambient Air Quality standards prescribed vide Government of India, Notification dtd. 16.11.2009 as amended.

*Adhigam*



● **COMPLIANCE OF WORKS SUGGESTED BY M.P.C.B.**

<b>Sr. No.</b>	<b>Work</b>	<b>Compliance</b>
1)	Upgradation of ETP	Although, all results confirm to stipulated limits, we have taken in plant control in form of Mechanised Screen & Skimmers to reduce quantity and concentration of effluent also the anaerobic stage is being added.
2)	Condensate polishing unit	Already all the excess condensate is reused additional nitrification is being installed to further enhance quality.
3)	Round the clock monitoring of ETP	Necessary workforce in place. Also, continuous monitoring system is in operation.
4)	Provision of STP	Provided septic tank filtration system is being installed. All treated effluent is used for gardening
5)	Reporting Compliance	Already reported compliance wide our letter no . SDIPL /ETP / 43/ 2023-24 Date- 19.06 .2023 to R.O.M.P.C.B Kolhapur



## ● WATER MASS BALANCE

Sr. No.	Particulars	Water Consumption CMD	Effluent Generation CMD	Treatment System	Disposal Method
1	Domestic Purpose	50	40	Septic Tank	On Land For Gardening
2	Processing Whereby Water Gets Polluted And Pollutants Are Biodegradable	700	450	Primary As Diffused Aeration System & Secondary (Multi grade Filter)	On Land For Ferti Irrigation (55 Acres)
3	Processing Whereby Water Gets Polluted, Pollutants Are Not Biodegradable And Toxic	0	0		
4	Industrial Cooling Spraying In Mine Pits Or Boiler feed	250	10	Cooling Tower	
5	Other (Excess Condensate Water)	0	500		On Land For Ferti Irrigation (55 Acres)



## ● TREATMENT APPROACH - INPLANT CONTROL SYSTEM

The sugar factory effluent emanates mainly from washing, cleaning operation thereby entraining organic load and suspended solids load in the form of sugar juice, sugar particles, bagasse etc. in the wash waters leading to effluent generation. The first step that will be taken for prevention of unnecessary hydraulic and organic loading shall be in plant control by minimizing water use and thereby effluent generation, effecting partial recycle of streams like condensates and cooling waters.

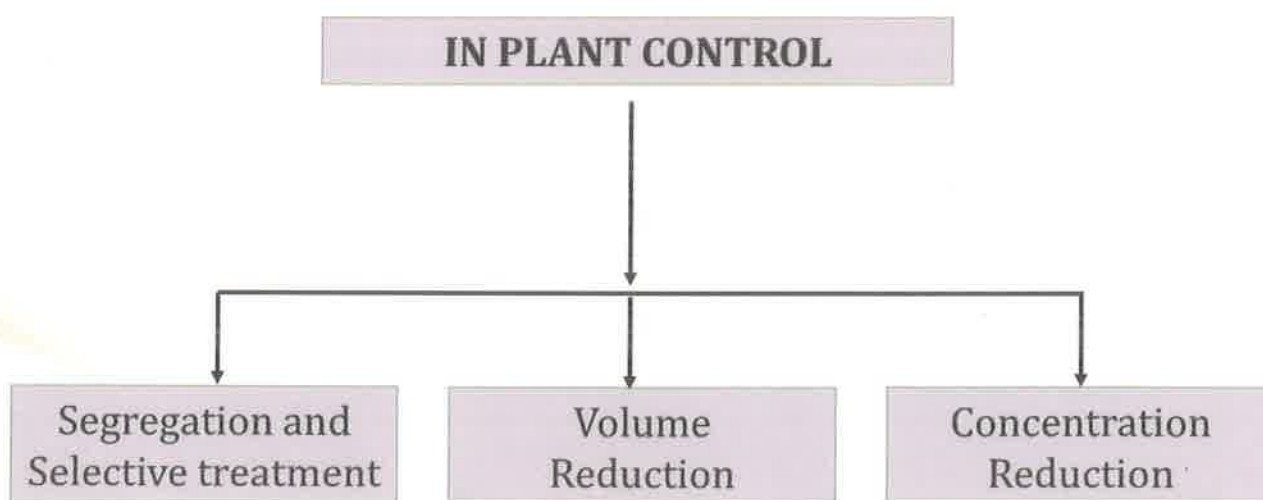
Segregation and selective treatment of effluent sub-streams shall also be implemented.



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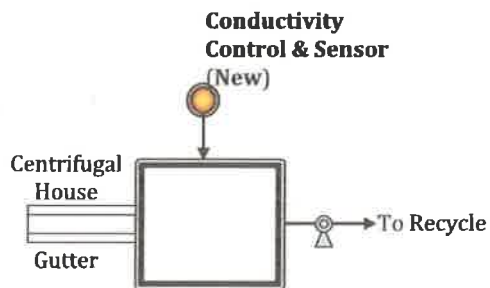
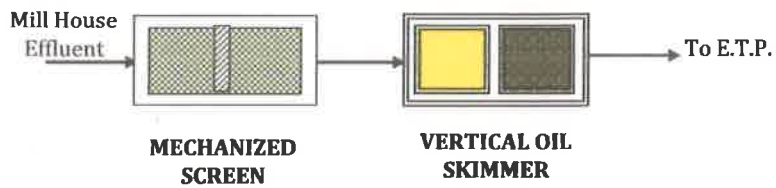
## ● STRATEGY OF IN PLANT CONTROL



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## ● SCHEMATIC PROCESS FLOW DIAGRAM



**INPLANT CONTROL SYSTEM FOR  
SHREE DUTT INDIA PVT. LTD., (SANGLI UNIT.)**



## ● Segregation and Selective Treatment

### 1) Mechanized Screen



Auto bagasse removal Screen in Mill section helps to remove bagasse from Mill house effluent, thereby reducing suspended and organic matter pollution load to Effluent Treatment Plant.



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## ● Segregation and Selective Treatment

### 2) Vertical Oil Skimmer



Presence of oil and grease in the effluent can severely affect the biological mode of treatment. A Mechanized Oil and Grease Removal Mechanism is therefore proposed to separate out the oil and grease content of the effluent before subjection to the biological treatment mode.



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## ● Volume and Concentration Reduction



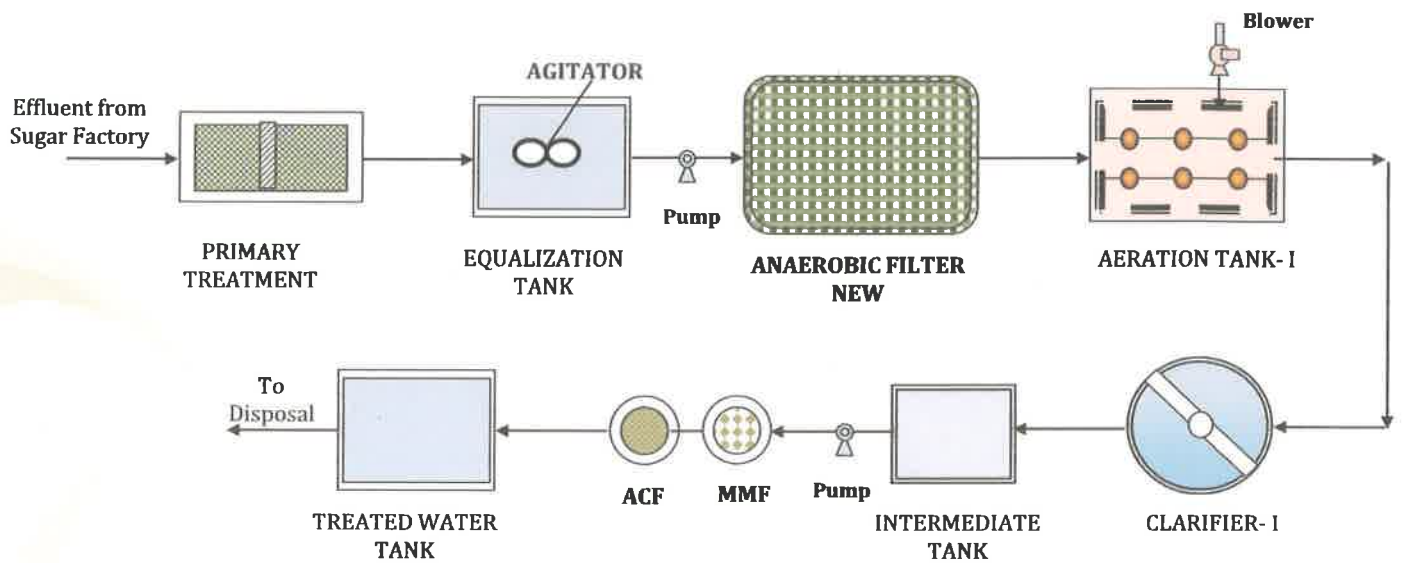
Arrangement for segregation and reutilization of effluent having probability of accidental entrainment of juice or syrup shall be made. Provision of this has proven to result in reduced organic matter concentration in the effluent to be treated.



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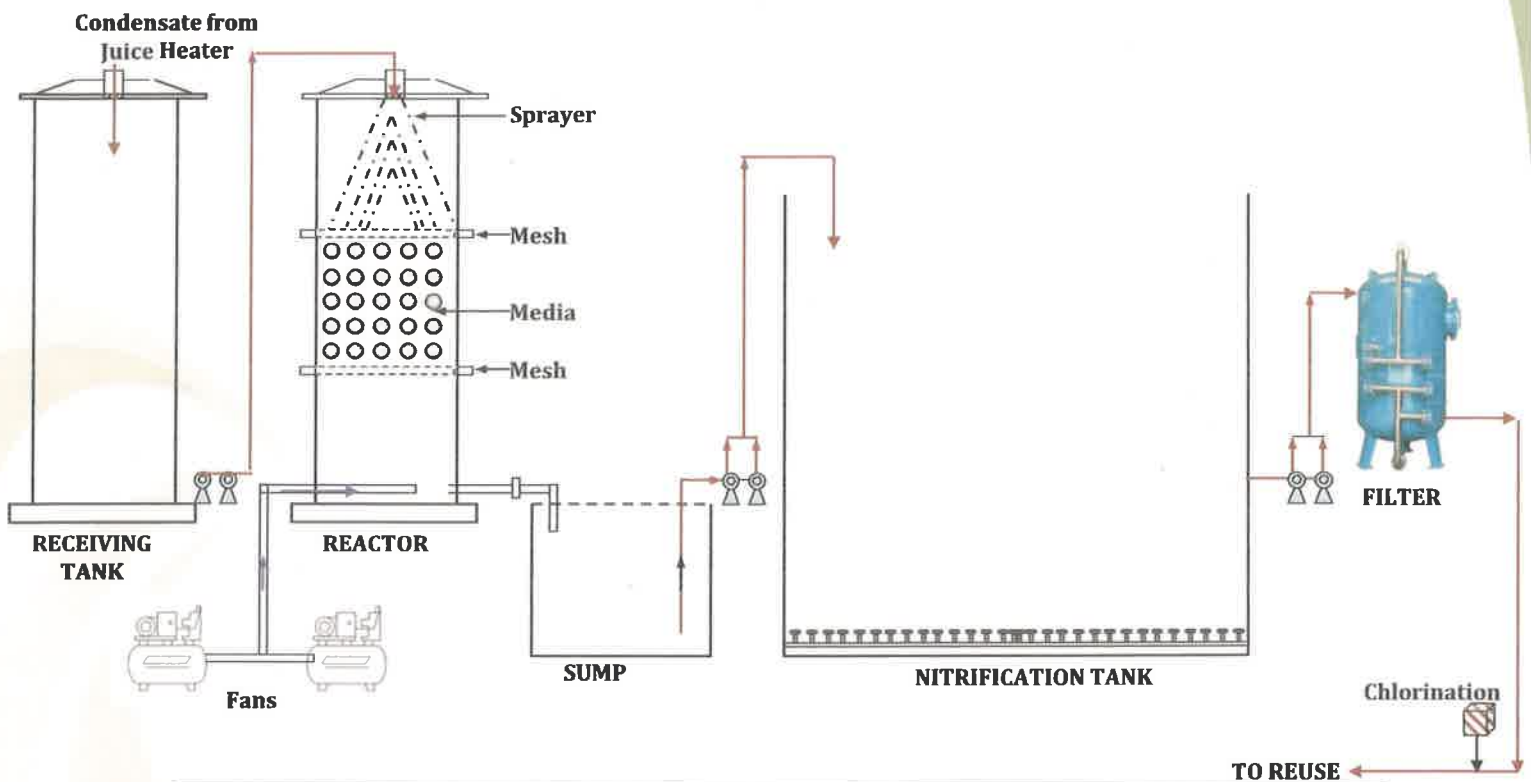
## ● MODIFICATION PROPOSED IN EFFLUENT TREATMENT PLANT



**SCHEMATIC PROCESS FLOW DIAGRAM FOR E.T.P.  
AT SHRI DUTT INDIA PVT. LTD., (SANGLI UNIT.)**



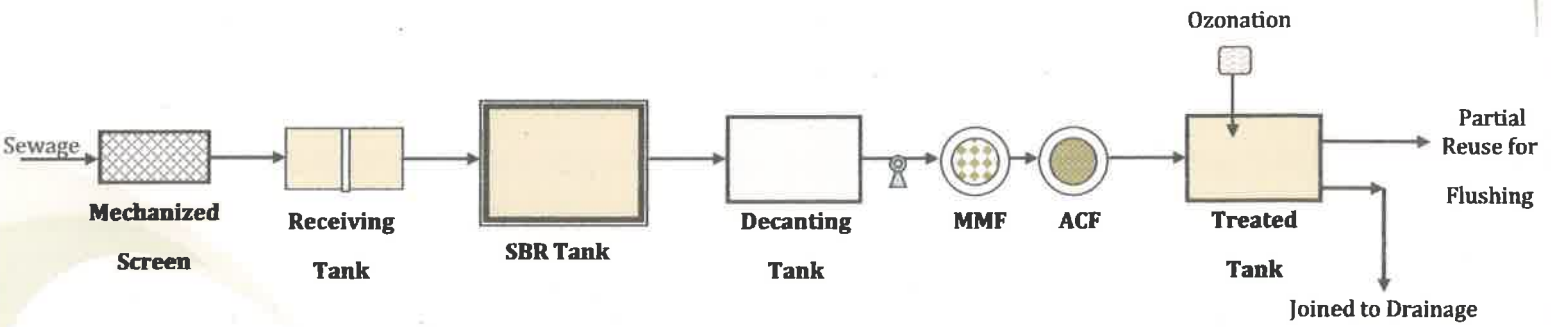
## ● SCHEMATIC PROCESS FLOW DIAGRAM FOR SUGAR C.P.U.



**SCHEMATIC PROCESS FLOW DIAGRAM FOR SUGAR C.P.U.  
AT SHRI DUTT INDIA PVT. LTD., (SANGLI UNIT)**



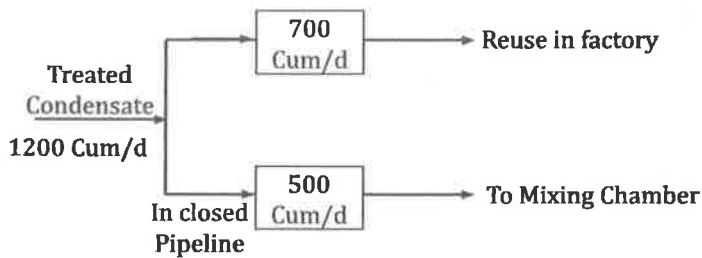
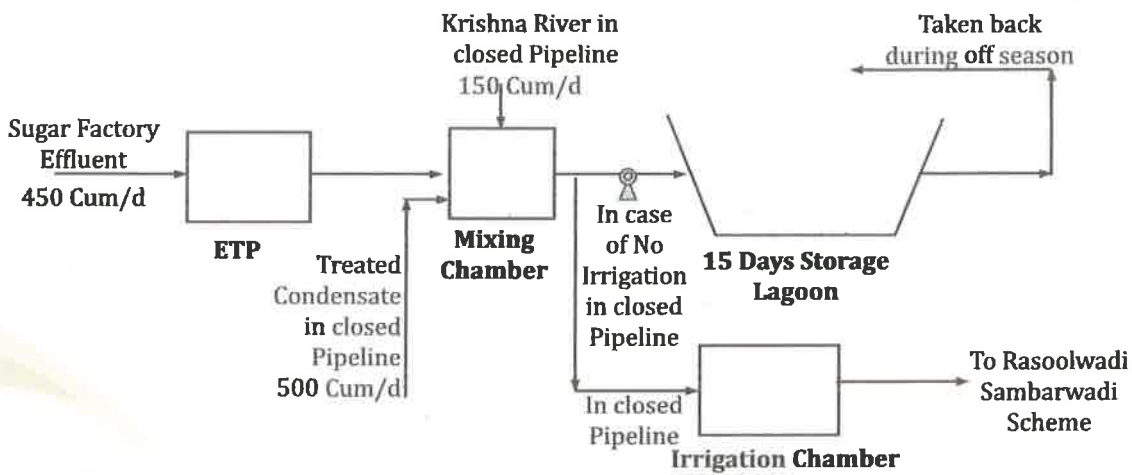
**● SCHEMATIC PROCESS FLOW DIAGRAM FOR S.T.P.**



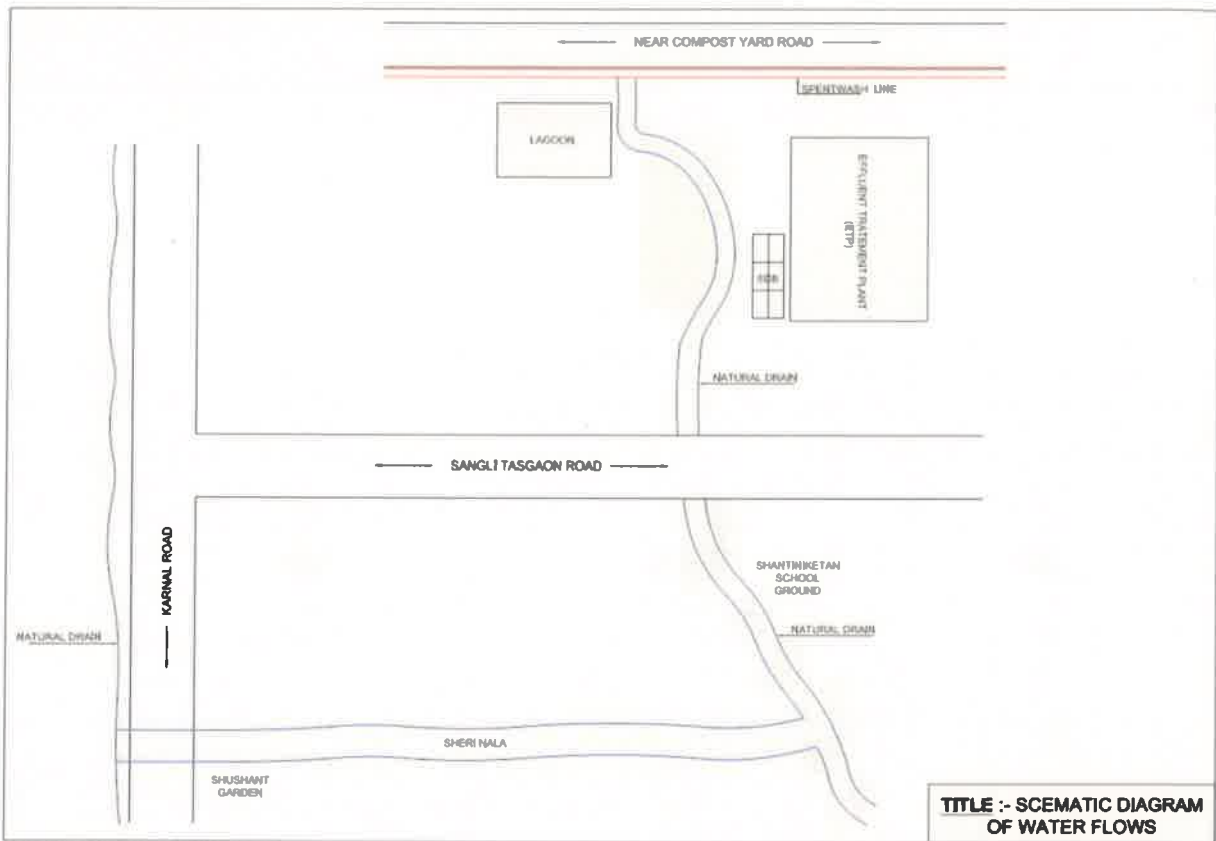
**SCHEMATIC PROCESS FLOW DIAGRAM FOR S.T.P.  
AT SHRI DUTT INDIA PVT. LTD., (SANGLI UNIT)**



**● SCHEMATIC WASTEWATER DISPOSAL PLAN AT SHRI DUTT INDIA PVT. LTD., SANGLI**



### ● SCHEMATIC DIAGRAM FOR WATER FLOWS



# ● LAYOUT RASULWADI SAMBARWADI DISTRIBUTION SCHEME



● LINING OF 15 DAYS LAGOON



## ● CLARIFICATIONS REGARDING OBSERVATIONS IN EXPERT COMMITTEE REPORT

PAGE NO.	POINT	DESCRIPTION	CLARIFICATION
11)	iii)	The sugar industry is not utilizing its 15 days treated effluent storage lagoon i.e. HDPE lined lagoon-2 for storage of treated effluent from ETP (meant for storage of ETP treated effluent during no demand for irrigation). Instead, excess process condensate @ 20 m <sup>3</sup> /hr i.e. 480 m <sup>3</sup> /day is being channelized into the existing 15 days treated effluent storage lagoon and later pumping the same into the dilution chamber of ETP.	<p>As given in the water flow diagram, following Streams are mixed in the Mixing Chamber.</p> <p>a) Treated Sugar Factory Effluent - About 450 Cum/d b) Treated Excess Condensate - About 500 Cum/d c) River Water for Irrigation - About 150 Cum/d</p> <p>This water from Mixing Chamber goes to irrigation sump in a closed pipeline. This 1100 Cum/d water is disposed on 22 Hec. of crop area under Rasoolwadi - Sambarwadi Scheme.</p> <p>This water quantity is just sufficient to irrigate the scheme and therefore, there is no of storage requirement. However, whenever there is a power failure for irrigation scheme this water is taken to 15 days lagoon which is then re-utilized after towards.</p>
12)	iv)	It is observed that the concentration of all the monitored parameters from the final outlet of ETP are found to be exceeding the MPCB prescribed discharge norms for irrigation, except chloride; sulphate; TDS and O&G i.e. pH: 4.8 (not in the range of 5.5 - 9); BOD: 440 mg/l > 100 mg/l; COD: 1,619.2 mg/l > 250 mg/l; and SS: 178 mg/l > 100 mg/l respectively.	<p>The Karkhana has scrupulously maintained the E.T.P. with continuous monitoring in form of</p> <p>a) Analysis carried out at site. b) On line monitoring system installed, which is directly linked to MPCB, CPCB servers. c) The joint vigilance sample results from M.P.C.B. for the samples taken during season 2022-2023.</p> <p><b>ALL THE RESULTS INDICATE THAT THE TREATED EFFLUENT PARAMETER CONCENTRATIONS ARE WELL WITHIN LIMITS OF CONSENTED PARAMETERS.</b></p>



## ● CLARIFICATIONS REGARDING OBSERVATIONS IN EXPERT COMMITTEE REPORT

PAGE NO.	POINT	DESCRIPTION	CLARIFICATION
16) & 17)	ii)	<p>As a result of rupture in spent wash conveyance pipeline, about 21 lac liters i.e. 2,100 m<sup>3</sup> of raw spent wash flown into adjacent drain of the sugar industry; which is meant for conveyance of excess process condensate water into 15 days treated effluent storage lagoon no. 2 (unlined lagoon), which already had about 10,000 m<sup>3</sup> of excess process condensate water &amp; treated effluent from ETP of sugar industry. Later during 09/03/2023, the sugar industry started pumping the said mixed effluent streams into final lift irrigation sump through mixing chamber of ETP for discharge into on land irrigation (Rasulwadi - Sambarwadi irrigation scheme - 22 ha land). During the aforesaid event i.e. conveyance of mixed effluent streams (viz. raw spent wash &amp; process condensate water) from the lift irrigation sump into irrigation, the RCC pipeline meant for the same has ruptured (reportedly ruptured) and flown into adjacent natural drain, carrying untreated domestic sewage from the nearby settlements, which further confluences with Madhavnagar nalah &amp; later Sherin nalah and ultimately confluences with Krishna River.</p>	<p>As submitted earlier, our treated excess Condensate is not taken to our 15 days storage lagoon and instead, it is directly mixed with treated sugar effluent.</p> <p>In fact, there is no provision to enter this water in lagoon, which has water at higher level. If the irrigation, network is temporarily, dysfunctional, (due to electricity failure) for that period only the treated effluent + condensate is temporarily stored in 15 days lagoon.</p> <p>We have not taken back any water from lagoon on 9<sup>th</sup> March since season was operational and adequate quantity of water was available for irrigation.</p> <p>It was erroneously reported by our site personnel that our RCC pipeline from Mixing Chamber to Irrigation Chamber got ruptured. The pipeline was and is intact.</p>



## ● CLARIFICATIONS REGARDING OBSERVATIONS IN EXPERT COMMITTEE REPORT

PAGE NO.	POINT	DESCRIPTION	CLARIFICATION
17)	iii)	As per the monitoring carried-out by MPCB on the day of incidence, the said effluent stream from final lift irrigation sump of the sugar industry was having concentration of pH: 5; 154mg/l; TDS: 2,208 mg/L; BOD: 1,400 mg/l and COD: 6,720 mg/l respectively. The mixed streams of wastewater (raw spent wash, process condensate water & untreated domestic sewage) at natural concentration of pH: 5.6; SS: 187 mg/l; TDS: 2,014 mg/l; BOD: 1,200 mg/l and COD: 5,648 mg/l respectively. Similarly, the mixed streams of wastewater (raw spent wash, process condensate water & untreated domestic sewage) at Sherin nalah pumping station, before confluence with Krishna River was having the concentration of pH: 7.1; SS: 160 mg/l; TDS: 1,260 mg/l; BOD: 160 mg/l and COD: 568.8 mg/l respectively. Based on the aforesaid monitoring results, the concentration of BOD was 46; 40 & 5.3 times more than the prescribed discharge standards. Similarly, the concentration of COD was 27; 22.5 & 2.3 times more than the prescribed discharge standards.	We are equally surprised by results of analysis in our irrigation sump, as we have never exceeded any consented limits any parameter. Also, there was no any complaint was received during the period or in all these years.



## ● CLARIFICATIONS REGARDING OBSERVATIONS IN EXPERT COMMITTEE REPORT

PAGE NO.	POINT	DESCRIPTION	CLARIFICATION
20)	viii)	<p>The sugar industry has not provided treatment system for management of excess process condensate water and it is also not stipulated in the CTO of sugar industry dated 04/11/2020. The joint committee observed from the CTOs issued by MPCB to various sugar industries that management of process condensate water has been stipulated by imposing condition of installation of condensate polishing unit for treatment of excess process condensate water. Further, it is observed that the sugar industry is proportionating its treated effluent ETP with fresh water from Krishna River &amp; excess process condensate water and ultimately discharging into irrigation, such condition is not stipulated in the CTO dated 04/11/2020 issued by MPCB and it is non-compliance of the CTO conditions. Some of the photographs taken during the joint committee inspection are given at <b>Annexure -9.</b></p>	<p>We are cooling and reusing major portion of (II Body) Condensate Stream (700 out of 1200 m<sup>3</sup>/d), Since it does not contain any organic matter. We have added 'Nitrification' in the scheme, and the same shall be operational before next crushing season.</p> <p><b>Disposal:-</b> The practice of combing treated sugar effluent with condensate and applying it on irrigation is about 40 years, which benefits member farmers in the low rainfall area of Rasoolwadi, Sambarwadi, who have no perennial source of irrigation water.</p>



## ● RECONNAISSANCE

- **The Sugar Factory or its Environmental Management activities has no role in the incidence of pollution of natural stream occurrence.**
- **However, as per the direction by MPCB, Closure of production was effected immediately.**
- **Reassessing and strengthening of Environmental Control structures & equipments is carried out.**
- **There is no intentional violation of conditions / stipulations and we have taken steps to follow in TOTO the instructions and guidelines issued by M.P.C.B. officials and Expert Committee members. We shall keep a strict vigil and report to your offices from time to time.**



**PRAYER**

✱ **CONSIDERING THE FOREGOINGS, AND THE RECORD OF ENVIRONMENTAL MANAGEMENT, THE KARKHANA BE ALLOWED TO RESTART PRODUCTION, WHICH IS IN THE INTEREST OF SURROUNDING MEMBER FARMERS. THE KARKHANA HAS FULFILLED ALL MEASURES FOR ENVIRONMENTAL MANAGEMENT, AS STIPULATED BY M.P.C.B. AND COMMITTEE OF EXPERTS IN THIS REGARD.**

