

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

**Original Application No. 60 of 2020 (SZ)**

S. Pappathi,  
w/o. Subash Chandra bose,  
7/73, K.Pichampatti,  
K.P. Thazaipatti,  
K.Pichampattipost,  
Karur - 639001

....Petitioner

Vs.

1. The Chairman  
Tamil Nadu Pollution Control Board  
76, Anna Salai,  
Guindy Industrial Estate  
Raceview colony  
Chennai - 600032.
2. The District Environmental Engineer  
Karur District  
Tamil Nadu Pollution Control Board  
Karur - 639001
3. The Managing Director,  
Tamil Nadu Newsprint and Papers Limited,  
Kagithapuram,  
Karur - 639136
4. R. Subramani  
The Proprietor,  
M/s. Bahavathiamma Steels  
S.F No: 771/1,2,3,4 and 774/1,2  
ThotakurichiPunjai Village,  
Manmangalam Taluk,  
Karur - 639113

....Respondents

**COUNTER AFFIDAVIT ON BEHALF OF 3<sup>rd</sup> RESPONDENT**

I, L.SEZHIAN, son of A. Lakshmanan, aged about 56 years and having factory at Kagithapuram, Karur - 639 136, and having corporate office at 67, Mount Road, Guindy, Chennai-600032, do hereby solemnly affirm and sincerely state as follows:

1. I am the Senior Manager (Legal) of the 3<sup>rd</sup> Respondent and as such I am well acquainted with the facts and circumstances of the subject matter of the present proceedings, based on the records maintained by the Company and I

For Tamil Nadu Newsprint and Papers Ltd.,

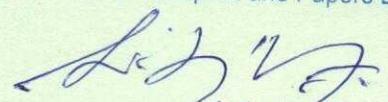


Authorised Signatory

am competent, to swear to the present Counter on behalf of the 3<sup>rd</sup> Respondent ("**Answering Respondent**").

2. I state that the Answering Respondent has perused the above Application filed by the Applicant herein and denies each and every one of the averments and allegations contained therein save those that are specifically admitted herein.
3. I state that the 3<sup>rd</sup> Respondent is an enterprise established in the year 1985 and promoted by the Government of Tamil Nadu. The 3<sup>rd</sup> Respondent is a reputed industry engaged in the production of newsprint and writing paper from bagasse, a residue of sugar cane and is a market leader in the manufacturing of eco-friendly paper by adopting innovative technology to ensure sustainable development. By implementing state-of-the art technologies such as ECF bleaching, oxygen delignification, integrated chlorine dioxide production, wash presses, odour free recovery boiler, incineration of non-condensable gases, production of bio-gas from bagasse wash effluent, deinked pulp etc., the 3<sup>rd</sup> Respondent, enjoys the status of the most environmentally sustainable mill in the country with least water consumption.
4. The 3<sup>rd</sup> Respondent is taking constant efforts to reduce the carbon footprint. In fact, the 3<sup>rd</sup> Respondent consumes biofuel and bio-gas to a larger extent and such consumption constitutes about 35.41% of the total energy consumed.
5. I state that the 3<sup>rd</sup> Respondent industry has a valid Hazardous Waste Authorisation dated 16.02.2017, issued by the 1<sup>st</sup> Respondent under Rule 6(2) of the Hazardous and Other Waste (Management and Transboundary Movement) Rules, 2016 (the "**HW Rules**") for the category 32.1 under Schedule -I -'Spent Chemicals' which include lime grit and lime sludge. In so far as lime sludge is concerned, the authorisation covers "*Generation, Collection, Storage, Transportation and Disposal of Spent Chemicals (lime sludge) generated in the causticizing section of CRP I to lime kiln and TNPL cement plant for reuse or to other cement plants through TNPCB authorised agencies.*"
6. I state that with the object of utilising the solid waste generated from its paper manufacturing, the 3<sup>rd</sup> Respondent has also commissioned a cement plant in

For Tamil Nadu Newsprint and Papers Ltd.,

  
Authorised Signatory

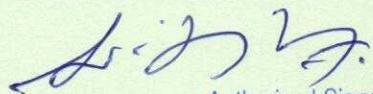
January 2013 with an capacity of 600 TPD, to manufacture high grade cement from its mill waste materials viz., Lime sludge and fly ash thereby ensuring captive consumption of its solid waste. In fact the 3<sup>rd</sup> Respondent, is one of the first mills in the paper industry, to produce cement from these solid wastes.

7. In order to expedite disposal of the balance lime sludge that may be remaining after captive consumption, to authorised agencies, the 3<sup>rd</sup> Respondent, vide its letter dated 28.08.2019, requested the 1<sup>st</sup> Respondent to modify the condition/direction imposed by the 1<sup>st</sup> Respondent pertaining to disposal of lime sludge, issued on 02.08.2019. Considering the same, the 1<sup>st</sup> Respondent has issued the following modified direction to the 3<sup>rd</sup> Respondent *qua* disposal of lime sludge, vide communication dated 03.09.2019:

*"The unit shall ensure complete utilization of lime sludge categorized under 32.1- Spent Chemicals) in the TNPL cement plant for captive use. Further the excess hazardous waste (lime sludge categorized under 32.1- Spent Chemicals) if any shall be disposed to authorised cement kilns/Agencies having valid authorization of TNPCB issued under Hazardous Waste and other waste (Management and Transboundary Movement) Rules 2016."*

8. During current year, till date, 99.97% of the lime sludge generated has been utilized for both recycling in the paper plant manufacturing process and Cement plant manufacturing process. A copy of the annual returns in Form-4 filed by the 3<sup>rd</sup> Respondent for the period 01.04.2019 to 31.03.2020, showing the captive usage of lime sludge and manner of disposal of other wastes, is enclosed herewith. While majority of the lime sludge generated is used for captive consumption through the 3<sup>rd</sup> Respondent's cement plant, the balance is sold to other authorised cement kilns/authorised agencies, identified by the 3<sup>rd</sup> Respondent through a tendering process, in line with the direction issued by the 1<sup>st</sup> Respondent Board on 03.09.2019.
9. In so far as the 4<sup>th</sup> Respondent is concerned, the bid submitted by the said Respondent for sale of lime sludge was considered only in light of valid authorisation submitted under the HW Rules for "Collection, Storage,

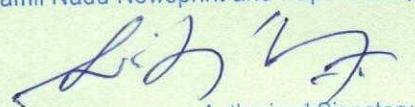
For Tamil Nadu Newsprint and Papers Ltd.,

  
Authorised Signatory

*Transportation, Reception, Disposal*" for category 32.1 under Schedule -I - 'Spent Chemicals' and valid consent, issued by the 1<sup>st</sup> Respondent. I state that the Answering Respondent, has engaged the 4<sup>th</sup> Respondent for disposal of the balance lime sludge, on the strength of the authorisation granted by the 1<sup>st</sup> Respondent which has assessed the 4<sup>th</sup> Respondent's facilities for dealing with storage of lime sludge. Further, such sale, through the 4<sup>th</sup> Respondent has been done, pursuant to the direction issued by the 1<sup>st</sup> Respondent authorising disposal through such authorised agencies.

10. The details of disposal lime sludge (captive utilization and disposal to authorised persons) for the past five years, was sought for by the 1<sup>st</sup> Respondent, *vide* communication dated 24.07.2020. Pursuant thereto, the 3<sup>rd</sup> Respondent has furnished these details under its letter dated 25.07.2020. Copies of the said communications are attached herewith. As can be seen from the details furnished, after consumption of lime sludge in the 3<sup>rd</sup> Respondent's own recycling process in lime kiln and in its cement plant, a balance quantity of 3915.38 MT of lime sludge has been disposed through the 4<sup>th</sup> Respondent in the year 2019-2020. There is no lime sludge accumulated in the premises of the Answering Respondent, as on date.
11. It would not be out of place to highlight that as observed in the inspection report (Page 5) submitted by the 1<sup>st</sup> Respondent before this Hon'ble Tribunal, the entire quantity of lime sludge sold to the 4<sup>th</sup> Respondent by the 3<sup>rd</sup> Respondent, has already reached various actual users and there is no lime sludge which is accumulated in the premises of the 4<sup>th</sup> Respondent. In fact certain directions have also been issued by the 1<sup>st</sup> Respondent authority to the 4<sup>th</sup> Respondent, subsequent to the inspection conducted in the 4<sup>th</sup> Respondent premises.
12. I state that having exercised due caution in ensuring compliance with the condition imposed by the 1<sup>st</sup> Respondent *vide* communication dated 03.09.2019, the 3<sup>rd</sup> Respondent cannot be held liable for any alleged violation of the authorisation granted to the 4<sup>th</sup> Respondent under the HW Rules. I state that authorisation under the HW Rules, is granted for specific activities in

For Tamil Nadu Newsprint and Papers Ltd.,

  
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order to regulate movement of such hazardous waste, till its disposal or actual use by an 'actual user'. It is for this reason that a separate authorisations are granted to persons concerned, right from the point of generation of such wastes. Therefore, it would be unreasonable to pin the liability on the part of the 3<sup>rd</sup> Respondent, for any purported violation of the authorisation that has been issued to the 4<sup>th</sup> Respondent agency for storing/transportation/disposal of the lime sludge. I am advised to state that it is in this context that the term "Occupier" under Rule 3(21) of the HW Rules, ought to be construed. Under the said provision, the said term "occupier" in relation to any factory or premises, means a person who has, control over the affairs of the factory or the premises and includes in relation to any hazardous and other wastes, the person in possession of the hazardous or other waste. Therefore, in so far as the 4<sup>th</sup> Respondent is concerned, it is the primary responsibility of the 4<sup>th</sup> Respondent, who has control over the premises and in possession of the said waste to manage such waste as per the mandates of the HW Rules and it is for the 1<sup>st</sup> Respondent, which is the nodal regulatory agency concerned, to enforce such compliance under HW Rules.

13. While so, it is reiterated that the 3<sup>rd</sup> Respondent, takes its commitment towards the environment and maintaining environmentally sound manufacturing process, very seriously and undertakes to abide by any direction of this Hon'ble Tribunal issued in this regard.
14. Without prejudice to the aforesaid averments, the Answering Respondent is setting for its para-wise response to the contents of the original application:

Para	Reply
Synopsis : Para 1	As stated above, there is no violation from the 3 <sup>rd</sup> respondent in the subject matter. It is denied that the authorization granted to the 4 <sup>th</sup> respondent is violative of the authorization granted to the 3 <sup>rd</sup> respondent.

For Tamil Nadu Newsprint and Papers Ltd.,

  
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Para 2	<p>It is denied that the 3<sup>rd</sup> and 4<sup>th</sup> respondents are storing dangerous levels of sludge. More than 98% of the lime sludge generated during the last financial year was utilized for Captive consumption. During current year, till date, 99.97% of the lime sludge generated has been utilized for both recycling in the paper plant manufacturing process and Cement plant manufacturing process. The balance 0.03% was disposed to 4<sup>th</sup> respondent during December 2020. Hence, there is no back log / storage of lime sludge in the 3<sup>rd</sup> respondent premises.</p> <p>As stated above, it is reiterated that the sale of lime sludge to be disposed by the 3<sup>rd</sup> respondent was in keeping with the authorization, and the 4<sup>th</sup> respondent is also licensed to collect, store and transport the same.</p>
Para 3	<p>As is further set out in the averments above and the parawise response to the averments of the Original Application, the contents of this paragraph are denied.</p>
<p><i>Original</i> <i>Application-</i> Preamble and Para 1-8</p>	<p>These averments merit no response.</p>
Para 9	<p>It is denied that the respondents received any consent to operate without compliance, and it is denied that there was any non-compliance. It is reiterated that the 3<sup>rd</sup> respondent complies with all applicable rules in storing and selling lime sludge. It is reiterated that most of such sludge is consumed for utilization and that currently there is no sludge even available on the premises of the 3<sup>rd</sup> respondent.</p>
Para 11	<p>It is denied that the sale of lime sludge to the 4<sup>th</sup></p>

For Tamil Nadu Newsprint and Papers Ltd.,

  
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	<p>respondent is against the terms of Consent and Authorizations accorded to the 3<sup>rd</sup> and 4<sup>th</sup> respondents, and reiterated that the sale order is based on the authorizations issued by the official respondents. It is denied that the 4<sup>th</sup> respondent is not authorized as a cement kiln unit.</p>
Para 12	<p>It is denied that the 3<sup>rd</sup> respondent sought to wash its hands off by selling off the sludge, and reiterated that the same is done with propriety and in accordance with the authorization and other laws and considerations binding over the 3<sup>rd</sup> respondent. It is denied that the 4<sup>th</sup> respondent has been reselling lime sludge inside the premises and the applicant is put to strict proof of the same. As stated above, the 4<sup>th</sup> respondent is authorized to convey and store hazardous substance such as the sludge and hence the 3<sup>rd</sup> respondent has acted properly in its order of sale to the 4<sup>th</sup> respondent.</p>
Para 13	<p>The averments herein merit no response.</p>
Para 14	<p>It is submitted that the averments of the applicant are unsubstantiated and devoid of merit and no steps have been taken to establish the same. It is reiterated that both 3<sup>rd</sup> and 4<sup>th</sup> respondents have obtained due authorizations and it is on this basis that the 3<sup>th</sup> respondent has issued its order of sale, and it is only upon satisfactory assessment of the 4<sup>th</sup> respondent's facilities of dealing with storage of sludge that the official respondents have issued authorization.</p>
Para 15	<p>It is strongly contended that the applicant seeks to make a case out of nothing by annexing photographs of dubious and completely unsubstantiated provenance. It is submitted that these photographs that allegedly prove that</p>

For Tamil Nadu Newsprint and Papers Ltd.,

  
Authorised Signatory

the 3<sup>rd</sup> respondent is not complying with the statutory and legal requirements are all denied as being veracious and the applicant is put to strict proof as to their contents. It is reiterated that the 3<sup>rd</sup> respondent has had no condition unfulfilled for the continued validity and applicability of its authorization and Consent. It is further submitted that nothing can be made out in the photographs forming Annexures 7 and 8 of the Original Application, and that the same show no hint as to the location of their origin. It is submitted that the same are just photographs of empty lands and piles of gravel or sand, with no proof attesting to their location.

It is submitted that the token photos of newspapers on the alleged premises of the 3<sup>rd</sup> respondent are intentionally unclear and even the date of the photographs cannot truly be ascertained. It is further submitted that all hazardous substances are indeed stored in indoor sheds with water proof and fire protected containers. It is reiterated that the photographs submitted by the applicant merely show piles of sand or cement, and dust, and leave no clarity as to what is being demonstrated. It is submitted that these photographs are utterly inconclusive as to the presence of any hazardous substance let alone lime sludge being in them.

Para 16	It is reiterated that the respondents have complied with all requirements in transport and storage of the lime sludge.
Para 17	The averments of this para merit no response.
Para 18	It is reiterated that the photographs in the application annexures are insufficient proof and completely devoid of

	authentication, and the averments of this paragraph are put to strict proof.
Para 19	For the reasons stated above it is denied once again that the sale between the 3 <sup>rd</sup> and 4 <sup>th</sup> respondents and the authorizations and consents granted by the official respondents are illegal.
<i>Grounds:</i> Para 1	The applicant is put to strict proof of the notion that the authorization of the 4 <sup>th</sup> respondent is in violation of law.
Para 2	It is reiterated that the 3 <sup>rd</sup> respondent operates in strict compliance of established procedure.
Para 3	It is denied that the respondents are in violation of authorizations granted and that they have stored material in the open without protection and the applicant is put to strict proof of the same.
Para 4	For the reasons stated above, it is reiterated that the sale of lime sludge is valid and legally permissible and that the 4 <sup>th</sup> respondent is licensed to procure the hazardous substance.
Para 5	It is reiterated that the photographs are utterly inconclusive, unclear and bad in provenance and no inference can be drawn from them.
Para 6	It is submitted that the report impugned herein was based on appropriate assessment and that the authorization of the respondents suffers from no infirmity.
Para 7	The averments herein are denied and it is submitted that the due inspection was conducted in accordance with law.
Para 8	It is reiterated that the authorizations given by the official respondents are good in law and without any defects.

For Tamil Nadu Newsprint and Papers Ltd.,

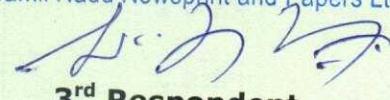
  
Authorised Signatory

In these circumstances, it is most humbly prayed that this Hon'ble Tribunal may be pleased to dismiss the above application with costs as devoid of merits and passed other or further orders, in the interest of justice.

Dated at Chennai on this, the 23<sup>rd</sup> day of March 2021.

**Counsel for 3<sup>rd</sup> Respondent**

For Tamil Nadu Newsprint and Papers Ltd.,

  
**3<sup>rd</sup> Respondent**  
Authorised Signatory

**VERIFICATION**

I , L.SEZHIAN , son of A.Lakshmanan, aged about 56 years and factory at Kagithapuram, Karur – 639 136, and having corporate office at 67, Mount Road, Guindy, Chennai-600032, do hereby solemnly affirm that I am the Authorised Signatory of the Answering Respondent and hereby verify that the contents of this reply are true and based on legal advice, and that I have not suppressed any material fact.

Date: 23 March 2021

Place: Chennai

For Tamil Nadu Newsprint and Papers Ltd.,

  
**3<sup>rd</sup> Respondent**  
Authorised Signatory

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

**Original Application No. 60 of 2020 (SZ)**

S. Pappathi,  
w/o. SubashChandrabose,  
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....Petitioner

Vs.

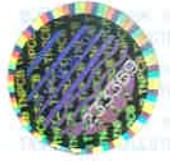
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....Respondents

**INDEX TO ANNEXURES FILED BY 3<sup>RD</sup> RESPONDENT**

<b>S. No.</b>	<b>Annexure</b>	<b>Date</b>	<b>Page No.</b>
1.	TNPCB's Hazardous Waste Authorization to the 3 <sup>rd</sup> respondent	16.02.2017	1
2.	Letter from 3 <sup>rd</sup> respondent to the TNPCB furnishing Annual Returns in compliance with the Authorization	20.05.2020	8
3.	Minutes of the Proceedings before the TNPCB concerning the 3 <sup>rd</sup> respondent	02.08.2019	12
4.	Letter from the TNPCB to the 3 <sup>rd</sup> respondent	03.09.2019	15
5.	Letter No. DEE/TNPCB/Karur/HW-Lime Sludge/2020 from TNPCB to	24.07.2020	17

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6.	Letter from the 3 <sup>rd</sup> respondent to TNPCB	25.07.2020	18
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8.	Letter from TNPCB to the 4 <sup>th</sup> respondent copied to the 3 <sup>rd</sup> respondent	22.02.2021	21



**TAMILNADU POLLUTION CONTROL BOARD**

**AUTHORISATION No. 17HFC6099784 dated 16/02/2017**

**Proceeding No. T12/TNPCB/F.0064KAR/HWA/RL/KAR/2017 dated 16/02/2017**

**Sub:** Tamil Nadu Pollution Control Board – Hazardous Waste Authorization-Fresh- M/s. M/S. TAMIL NADU NEWSPRINT AND PAPERS LIMITED, S.F.No. S.F Nos. 622, 624, 625, 626, 627, 634, 635, 636, 637, 641, 646, 647, 648, 649/B, 654, 658, 665, 667, 671, 672, 673/1, 677, 678, 679, 680, 681, 699, 704, 708 and 710 of Punjai Pugalur Village., PUGALUR PUNJAI Village, MANMANGALAM Taluk, Karur District - Authorization under Rule 6 (2) of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 enacted under Environment (Protection) Act, 1986 – Issued- Reg.

**Ref:** 1. Unit's application No. 6099784, dated 14-09-2016/ 03-02-2017.  
2. HWA-IR.No.0064KAR/HWA/RL/JCEE/M/2016 dated 30/12/2016.  
3. Unit's letter No.EMS/02/17 dated 03.02.2017

**FORM 2**

[See rule 6 (2)]

**FORM FOR GRANT OR RENEWAL OF AUTHORISATION TO THE OCCUPIERS, RECYCLERS, REPROCESSORS, REUSERS, USER AND OPERATORS OF DISPOSAL FACILITIES**

1. Number of authorization: 17HFC6099784 and dated : 16/02/2017
2. Chief General Manager (Production) of M/s. M/S. TAMIL NADU NEWSPRINT AND PAPERS LIMITED is hereby granted an Authorisation based on the enclosed signed Inspection report for Generation, Collection, reception, transportation, storage, utilisation and disposal of hazardous or other wastes or both on the premises situated at S.F.No. S.F Nos. 622, 624, 625, 626, 627, 634, 635, 636, 637, 641, 646, 647, 648, 649/B, 654, 658, 665, 667, 671, 672, 673/1, 677, 678, 679, 680, 681, 699, 704, 708 and 710 of Punjai Pugalur Village., PUGALUR PUNJAI Village, MANMANGALAM Taluk, Karur District.

**POLLUTION PREVENTION PAYS**

**அகம் தூய்மை வாய்மைக்கு ! புறம் தூய்மை வாழ்வுக்கு !**



Sl No	Schedule / Name of the Processes	Name of Hazardous Waste (with category No)	Quantity	Activities for which Authorization is issued
1	Schedule I/5. Industrial operations using mineral or synthetic oil as lubricant in hydraulic systems or other applications	5.1-Used or spent oil	150 T/Annum	Generation, Collection, Storage, Transportation and Disposal to Authorized Recyclers for Recovery and Reuse
2	Schedule I/32. Pulp and Paper Industry	32.1-Spent chemicals	5000 T/Annum	Generation, Collection, Storage, Transportation and Disposal of Spent Chemicals (lime grit) generated in the causticizing section of Chemical recovery plant I to TNPL Cement Plant to consume as raw material
3	Schedule I/32. Pulp and Paper Industry	32.1-Spent chemicals	325000 T/Annum	Generation, Collection, Storage, Transportation and Disposal of Spent Chemicals (lime sludge) generated in the causticizing section of CRP I to lime kiln and TNPL cement plant for reuse or to other cement plants through TNPCB authorized agencies
4	Schedule I/35. Purification and treatment of exhaust air/gases, water and waste water from the processes in this schedule and common industrial effluent treatment plants (CETP's)	35.1-Exhaust Air or Gas cleaning residue	3.0 T/Annum	Generation, Collection, Storage, Transportation and Disposal of Exhausted Lithium Molecular Sieves generated from the Oxygen plant to TSDF, Gummidipoondi/ TSDF, Undurimikidakulam village, Virudhunagar District for land fill
5	Schedule I/35. Purification and treatment of exhaust air/gases, water and waste water from the processes in this schedule and common industrial effluent treatment plants (CETP's)	35.2-Spent ion exchange resin containing toxic metals	3.0 T/Annum	Generation, Collection, Storage, Transportation and Disposal of spent Ion exchange resins generated in purification of water treatment plant to TSDF, Gummidipoondi for Incineration

**POLLUTION PREVENTION PAYS**

**அகம் தூய்மை வாய்மைக்கு ! புறம் தூய்மை வாழ்வுக்கு !**



## TAMILNADU POLLUTION CONTROL BOARD

6	Schedule I /35. Purification and treatment of exhaust air/gases, water and waste water from the processes in this schedule and common industrial effluent treatment plants (CETP's)	35.3-Chemical sludge from waste water treatment	95000 T/Annum	Generation, Collection, Storage, Transportation and Disposal of ETP primary sludge containing fibrous and filler materials to cardboard manufacturers to be used as raw material as per SI no. 4.13 of the SOP published by CPCB during June 2016
7	Schedule II /Class A: Based on Leachable Concentration Limits [TCLP/STLC]	A5-Lead concentration limit equal to (or) more than 5 mg/l	50 T/Annum	Generation, Collection, Storage, Transportation and Disposal of used lead acid batteries generated from maintenance of electrical and automobile department to Authorized Recyclers for Recovery and Reuse
8	Schedule II /Class A: Based on Leachable Concentration Limits [TCLP/STLC]	A66-Copper concentration limit equal to (or) more than 25 mg/l	100 T/Annum	Generation, Collection, Storage, Transportation and Disposal of used Copper cables generated from maintenance of mechanical, electrical and instrumentation department to Authorized Recyclers for Recovery and Reuse
9	Schedule II /Class B: Based on Total Threshold Limit Concentration [TTLC]	B1-Asbestos concentration limit equal to (or) more than 10000 mg/kg	100 T/Annum	Generation, Collection, Storage, Transportation and Disposal of Asbestos wastes generated during demolition of redundant buildings and civil structures to TSDF, Gummidipoondi/ TSDF, Undurimikidakulam village, Virudhunagar District for land fill

**POLLUTION PREVENTION PAYS**

**அகம் தூய்மை வாய்மைக்கு ! புறம் தூய்மை வாழ்வுக்கு !**



10	Schedule II /Class C- Based on Hazardous Characteristics- C12-Eco-toxic	51- Waste exhibits any of the Hazardous characteristics listed in Class C due to the presence of any hazardous constituents in the substances or wastes	100 T/Annum	Generation, Collection, Storage, Transportation and Disposal of Used Glass wool waste Generated during Steam line/ Tanks insulation replacement to TSDF, Gummidipoondi/ TSDF, Undurimikidakulam village, Virudhunagar District for land fill
11	Schedule III /Part-D- B3- Wastes containing principally organic constituents, which may contain metals and inorganic materials	B3020-Paper, paperboard and paper product wastes, provided they are not mixed with hazardous wastes-Waste and scrap of paper or paperboard of other paper or paperboard, made mainly of bleached chemical pulp, not coloured in the mass	142600 T/Annum	Reception, Transportation, Storage and Utilization (captive consumption)

3. This authorization shall be valid for a period upto 15/02/2022.

The Authorization is issued subject to the following general and special conditions annexed.

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

#### A. GENERAL CONDITIONS OF AUTHORIZATION

- The authorised person shall comply with the provisions of the Environment (Protection) Act, 1986 and the rules made there under.
- The authorization or its renewal shall be produced for inspection at the request of an officer authorized by Tamil Nadu Pollution Control Board.
- The person authorized shall not rent, lend, sell, transfer or otherwise transport the hazardous and other wastes except what is permitted through this Authorisation.
- Any unauthorized change in personnel, equipment or working conditions as mentioned in the application by the person authorized shall constitute a breach of his authorization.
- The person authorised shall implement Emergency Response procedure (ERP) for which this authorisation is being granted considering all site specific possible scenarios such as spillages, leakages, fire ,etc and their possible impacts and also carry out mock drill in this regard at regular interval of time.
- The person authorised shall comply with the provisions outlined in the CPCB guidelines on "Implementing Liabilities for Environmental damages due to Handling and Disposal of Hazardous Wastes and Penalty".

**POLLUTION PREVENTION PAYS**

**அகம் தூய்மை வாய்மைக்கு ! புறம் தூய்மை வாழ்வுக்கு !**



## TAMILNADU POLLUTION CONTROL BOARD

7. It is the duty of the authorized person to take prior permission of Tamil Nadu Pollution Control Board to close down the facility.
8. The imported Hazardous and other wastes shall be fully insured for transit as well as the accidental occurrences and its clean-up operation.
9. The record of consumption and fate of the imported hazardous and other wastes shall be maintained.
10. The Hazardous and other wastes which gets generated during recycling or reuse or recovery or pre-processing or utilisation of imported hazardous or other wastes shall be treated and disposed of as per specific conditions of Authorisation.
11. The importer or Exporter shall bear the cost of import or export or mitigation of damages if any.
12. An application for the renewal of an authorization shall be made as laid down under these Rules.
13. Any other conditions for compliance as per the Guidelines issued by the MoEF and CC or CPCB from time to time.
14. Annual returns shall be filed by June 30th for the period ending 31st March of the previous financial year.

### B. SPECIFIC CONDITIONS - HW Generator

1. The occupier/generator shall be responsible for safe and environmentally sound management of hazardous and other wastes.
2. The occupier shall follow the following steps for the management of hazardous and other wastes. (a) prevention (b) minimization (c) reuse (d) recycling (e) recovery, utilisation including co-processing and (f) safe disposal
3. The occupier shall take all the steps while managing hazardous and other wastes - (a) To contain contaminants and prevent accidents and limit their consequences on human beings and the environment; and (b) To provide persons working in the site with appropriate training, equipment and the information necessary to ensure their safety.
4. The occupier shall store the hazardous and other wastes for a period not exceeding ninety days and shall maintain a record of sale, transfer, storage, recycling, recovery, pre-processing, co-processing and utilisation of such wastes and make these records available for inspection:
5. The hazardous and other wastes shall be stored temporally in an isolated area earmarked for the purpose within the occupier's premises (it shall not be accessible to rain water) till scientific disposal. The storage area shall be fenced properly and a sign of danger shall be placed at the storage site.
6. The containers holding the hazardous and other wastes shall be kept in good condition and made of materials which can withstand the physical and environmental conditions during storage and transportation. Only properly cleaned containers shall be used for storage of hazardous and other wastes.
7. The occupier handling hazardous or other wastes shall maintain records of such operations of generation, handling, storage and disposal as per Form 3.
8. The hazardous and other wastes generated in the establishment of the occupier shall be sent or sold to an authorised actual user or shall be disposed of in an authorised disposal facility.

**POLLUTION PREVENTION PAYS**

**அகம் தூய்மை வாய்மைக்கு ! புறம் தூய்மை வாழ்வுக்கு !**



9. The occupier handling hazardous or other wastes shall ensure that the hazardous and other wastes are packaged in a manner suitable for safe handling, storage and transport as per the guidelines issued by the Central Pollution Control Board from time to time
10. The labelling of package of hazardous or other wastes shall be done as per Form 8. The label shall be of non-washable material, weather proof and easily visible.
11. The hazardous and other wastes shall be transported from the occupier's establishment to an authorised actual user or to an authorised disposal facility in accordance with the provisions of these rules.
12. The transport of the hazardous and other wastes shall be in accordance with the provisions of these rules and the rules made by the Central Government under the Motor Vehicles Act, 1988 and the guidelines issued by the Central Pollution Control Board from time to time in this regard..
13. The occupier shall provide the transporter with the relevant information in Form 9, regarding the hazardous nature of the wastes and measures to be taken in case of an emergency and shall label the hazardous and other wastes containers as per Form 8
14. The authorisation for transport shall be obtained either by the sender or the receiver on whose behalf the transport is being arranged.
15. The transporter/sender of the hazardous and other wastes shall prepare and maintain manifest in Form 10.
16. The occupier or the operator or the transporter shall immediately intimate TNPCB through telephone, e-mail about the accident and subsequently send a report in Form 11, where an accident occurs at the facility of the occupier handling hazardous or other wastes and operator of the disposal facility or during transportation
17. The occupier who intends to get its hazardous and other wastes treated and disposed of by the operator of a treatment, storage and disposal facility shall give to the operator of that facility, such specific information as may be needed for safe storage and disposal.
18. The occupier shall be liable for all damages caused to the environment due to improper handling and management of the hazardous and other wastes.
19. The occupier handling hazardous and other wastes shall submit annual returns containing the details specified in Form 4 to TNPCB on or before the 30th day of June of every year for the preceding period April to March.
20. Any increase in quantity of handling of hazardous and other wastes, any change in category of hazardous and other wastes and any change in method of handling operations shall be brought to the notice of the TNPCB and fresh authorization shall be obtained.

#### **ADDITIONAL SPECIFIC CONDITIONS**

1. The unit shall dispose the used or Spent Oil, used Lead acid batteries and used copper cables to the units having valid authorization of the Board and registration certificate as recyclers and necessary endorsement shall be made in respect of the quantity transacted in the original letter of registration issued to the recycling unit lifting used oil.
2. The Hazardous wastes shall be stored in a compatible container on an impervious platform in closed shed which shall be provided with requisite fire protection system, personal protective equipment and safety system.
3. No hazardous waste, municipal solid waste or bio-medical waste or any other type of contaminates shall

**POLLUTION PREVENTION PAYS**

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## TAMILNADU POLLUTION CONTROL BOARD

be allowed to be imported along with the paper wastes.

4. The unit submit the annual return for the import of waste paper in Form 4 to SPCB on or before 30th day of June following the financial year
5. The unit shall maintain the records of the Hazardous and Other Wastes imported in Form 3 and the record shall be made available for inspection as per hazardous and other Waste (HTM) Rules 2016.
6. The unit shall import required quantity of waste paper to manufacture the consented quantity of product.
7. The person authorized shall comply with all the conditions stipulated in the authorization and other conditions of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.
8. The unit shall maintain Form 3 and submit Form 4 prescribed under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 for the Hazardous wastes.
9. The Hazardous wastes shall be disposed only with manifest that shall be maintained in Form-10 of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.
10. The unit shall comply with the provisions under schedule III, Part D of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 for import of waste paper B3020.
11. The manifest shall be endorsed by the despatcher, transporter and receiver of hazardous wastes. The endorsed copy of the manifest shall be furnished to TNPCB as and when such disposal is made.
12. The unit shall ensure that all provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 as amended are complied with while handling hazardous waste.
13. The authorization is subject to the terms and conditions as may be specified in the Rules for the time being in force under the Environment (Protection) Act, 1986 and the conditions mentioned in the Schedule A & B.
14. The unit shall not store the Hazardous waste generated outside the premises of the unit.

Member Secretary  
Tamil Nadu Pollution Control Board  
Chennai

To  
Chief General Manager (Production)  
M/S. TAMIL NADU NEWSPRINT AND PAPERS LIMITED  
KAGITHAPURAM  
Pin:639136

### Copy to:

1. The JCEE-Monitoring, Tamil Nadu Pollution Control Board, Trichirappalli.
2. The District Environmental Engineer, Tamil Nadu Pollution Control Board, KARUR.

**POLLUTION PREVENTION PAYS**

**அகம் தூய்மை வாய்மைக்கு ! புறம் தூய்மை வாழ்வுக்கு !**



# Tamil Nadu Newsprint and Papers Limited

(A Government of Tamil Nadu Enterprise)

Kagithapuram - 639 136, Karur Dist. Tamil Nadu, India.

Phone : (0091) 04324 - 277001 to 277010 (10 Lines)

Fax : (0091) 04324 - 277025 Purchase : 276368

PMD : 04324 - 277027 Mktg : 277028 & 277029

HR : 04324 - 277273 Cell : 94860 41341 to 41343 Grams : NEWSPRINT



ICSI

NATIONAL AWARD  
FOR EXCELLENCE IN  
CORPORATE GOVERNANCE

ENV/02/20  
20 May, 2020

The District Environmental Engineer,  
Tamil Nadu Pollution Control Board,  
No: 26, Ramakrishnapuram West,  
Karur - 639 001

Sir,

Sub: TNPL - Main Plant - Furnishing Annual Return on Disposal of Hazardous Waste in FORM 4 - reg.  
Ref: Hazardous Waste authorization No. 17HFC6099784 dated 16/02/2017

With reference to subject matter, Annual Returns regarding disposal of Hazardous Wastes for the period between 01/04/2019 and 31/03/2020 prepared in FORM 4 as prescribed by Hazardous waste (Management and Transboundary Movement) Rules, 2016 is submitted herewith. It may kindly be noted that this Annual Returns is pertaining to following plants operating under single HW Authorization vide reference cited above as both units are located in the same premises.

- ❖ TNPL Main plant (Pulp and Paper Manufacturing)
- ❖ TNPL Captive Power Plant

This is for your kind information and records.

Thanking you,

Yours faithfully,

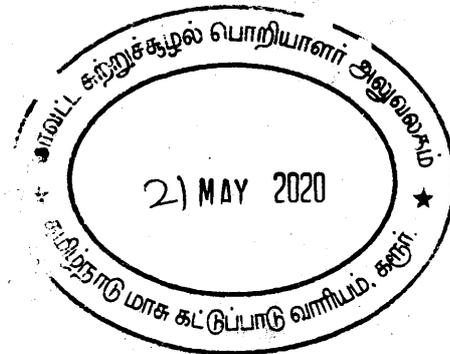
For TAMILNADU NEWS PRINT AND PAPERS LIMITED

*[Signature]*  
(DR.S.SUBRAMANIAN) 21/5/2020

GENERAL MANAGER (R & D and QC)

CC:

The Joint Chief Environmental Engineer (Monitoring),  
Tamilnadu Pollution Control Board,  
No.9, 4<sup>th</sup> Cross Street, Brindhavan Road,  
Fairlands, Salem - 633 016.



Corporate Office : 67, Mount Road, Guindy, Chennai - 600 032.

TNPL - The Corporate Identity Number : L 22121 TN 1979 PL C 007799

Fax : 044 - 22350834 / 22354614, Phone : 044 - 22354415 / 16 / 18, 22301094 - 97,

Grams : NEWSPRINT E-mail : response@tnpl.co.in/export@tnpl.co.in., Web : www.tnpl.com



The mark of  
responsible forestry

## Form – 4

(as per Rule 6(5), 13 (8) and 20(2))

## FORM FOR FILING ANNUAL RETURNS FOR THE FINANCIAL YEAR 2019-2020

1. Name and address of facility: Tamilnadu Newsprint and Papers Limited,  
Kagithapuram Karur District
1. Tamilnadu Newsprint and Papers Limited  
( Pulp and Paper Manufacturing)
2. TNPL Captive Power Plant  
(Both plants are located in a single premise)
2. Authorisation No. and Date of issue: 17HFC6099784 dated 16/02/2017.
- Name of the authorised person and full address with telephone, fax number and e-mail: Dr. S. Subramanian,  
General Manager (R&D and QC)  
Phone: 04324-277001 (10 lines) &  
Fax: 04324-277285  
[subramanian.s@tnpl.co.in](mailto:subramanian.s@tnpl.co.in)
3. Production during the year (Product wise), wherever applicable
- Printing and Writing Paper – 392250 MT
- Power Generation from Captive Power Plant- 67.30 MW

**Part A. Filed under the category of hazardous waste generators**

1. Total quantity of waste generated category wise.

Sl. No	Name of the waste	UOM	Total Quantity of waste generated in MT
1	Used/ Spent Oil	MT	84.55
2	Discarded Asbestos	MT	0.00
3	Used Glass wool	MT	30.83
4	Spent Ion Exchange Resin	MT	0.00
5	Waste Containing copper and its alloys	MT	6.80
6	Exhausted lithium Molecular Sieves	MT	0.00
7	Condemned lead acid batteries	MT	5.41
8	ETP - Primary Sludge	MT	40824.90
9	Spent chemical - Lime sludge	MT	298057.00
10	Spent chemical – Lime grits	MT	4740.66

## 2. Quantity dispatched

Sl. No	Name of the waste	UOM	To disposal facility	To recycler or co-processors of pre-processor	Others
1	Used/ Spent Oil	MT	---	86.69	---
2	Discarded Asbestos	MT	---	---	---
3	Used Glass wool	MT	35.16	---	---
4	Spent Ion Exchange Resin	MT	0.00	---	---
5	Waste Containing copper and its alloys	MT	---	4.86	---
6	Exhausted lithium Molecular Sieves	MT	0.00	---	---
7	Condemned lead acid batteries	MT	---	5.41	---
8	ETP – Primary Sludge	MT	---	---	40824.90*
9	Spent chemical – Lime sludge	MT	---	---	3916.00#
10	Spent chemical – Lime Grit	MT	---	---	---

\* Sold as raw material to small cardboard Industries.

# Sold to M/s. Bahavathi Amman Steels possessing valid TNPCB authorization.

## 3. Quantity utilised in- house, if any

- ❖ The Spent chemical lime sludge –
  - ✓ Re-burnt in lime kiln in MT– 170205.00
  - ✓ Used in TNPL Cement production in MT- 131362.00
- ❖ The Spent chemical lime grit –
  - ↳ Used in TNPL Cement production in MT – 4790.22

## 4. Quantity in storage at the end of the year

Sl. No	Name of the waste	UOM	Quantity in storage at the end of the year in MT
1	Used/ Spent Oil	MT	2.81
2	Discarded Asbestos	MT	0.00
3	Used Glass wool	MT	3.73
4	Spent Ion Exchange Resin	MT	0.00
5	Waste Containing copper and its alloys	MT	2.25
6	Exhausted lithium Molecular Sieves	MT	0.00
7	Condemned lead acid batteries	MT	0.00
8	ETP – Primary Sludge	MT	0.00
9	Spent chemical – Lime sludge	MT	0.00
10	Spent chemical - Lime grits	MT	0.00

**Part B. To be filled by Treatment, storage and disposal facility operators: Not applicable**

**Part C. Filed under the category of other users**

**Name of the other waste imported:** Paper, Paper board and Paper product wastes  
(imported as other wastes as per Hazardous and Other Wastes (Management & Transboundary Movement) Rules 2016 schedule III under Part D Basel No. 3020 )

**Purpose of waste import:** Deinked pulp manufacturing

1. Quantity of waste received during the year
 

I. Domestic sources*	:	37682.450
II Imported	:	79840.823
  
2. Quantity in stock at the beginning of the year:
 

I. Domestic sources*	:	15.510
II Imported	:	3649.547
  
3. Quantity of waste paper recycled or co-processed or used:
 

I. Domestic sources*	:	37697.96
II Imported	:	74576.407
  
4. Quantity of products dispatched (wherever applicable): Not applicable
  
5. Quantity of waste generated :  
(Generated while processing both domestic and import sources)
 

I. Plastic waste	:	4508.62 (30% Moisture)
II. Dip sludge	:	44919.05 (50% Moisture)
  
6. Quantity of waste disposed :
 

I. Plastic waste	:	4508.62 (30% Moisture)
II. Dip sludge	:	44919.05 (50% Moisture)
  
7. Quantity re-exported (wherever applicable): Not applicable
  
8. Quantity in storage at the end of the year:
 

I. Domestic sources	:	0.00
II Imported	:	8913.963

\* Domestic sources are not covered under Hazardous Waste Authorization.

Date : May 20, 2020  
Place: Kagithapuram

  
Signature of the Occupier or  
Operator of the disposal facility



# TAMILNADU POLLUTION CONTROL BOARD



**PROCEEDINGS NO.T1/TNPCB/F.0064/KAR/RL/W&A/2019 Dated: 02.08.2019**

**SUB:** TNPCB – Industries – **M/s. Tamil Nadu Newsprint and Papers Limited** ,  
S.F.No. S.F Nos. 622, 624, 625, 626, 627, 634, 635, 636, 637, 641, 646, 647,  
648, 649/B, 654, 658, 665, 667, 671, 672, 673/1, 677, 678, 679, 680, 681, 699,  
704, 708 and 710 of Punjai Pugalur Village, Manmangalam Taluk and Karur  
District– Certain directions under Section 33(A)of the Water (Prevention and  
Control of Pollution) act, 1974 as Amended and Section 31A of the Air  
(Prevention and Control of Pollution) act, 1987 as Amended - Issued –  
Regarding.

**REF:** 1. PROCEEDINGS NO.T12/TNPCB/F.0064KAR/RL/KAR/W&A/2017  
dated: 13/04/2017  
2. DEE's Letter No.DEE/TNPCB/Karur/TNPL-Paper/2019,dated 03.07.2019.  
3.JCEE (M)'s IR.No.: F.0064/ KAR/ RL/JCEE(M)/SLM/2019/Dated:24.07.2019.

\*\*\*\*\*

Whereas the consent issued to the unit of M/s. Tamil Nadu Newsprint and  
Papers Limited, S.F.No. S.F Nos. 622, 624, 625, 626, 627, 634, 635, 636, 637, 641,  
646, 647, 648, 649/B, 654, 658, 665, 667, 671, 672, 673/1, 677, 678, 679, 680, 681,  
699, 704, 708 and 710 of Punjai Pugalur Village, Manmangalam Taluk and Karur  
District was renewed up to 31.03.2022 vide reference first cited subject to certain  
conditions.

Whereas, the unit is generating about 30,000 to 40,000 KLD of treated effluent  
from the process and the treated effluent after satisfying the Board's standards is  
utilized for irrigation in the TEWLIS area of 1400 hectares for the past two decades.

Whereas during the inspection of the unit by DEE on 02.07.2019 it was observed  
that present method of irrigation system in TEWLIS area generates large quantity of  
seepage water, ROA of samples show a gradual increase in the TDS level of  
groundwater in all monitoring wells and in some wells the level of TDS is more than  
8000 mg/l, there was a lateral movement of contamination to the TEWLIS adjoining  
area, the treated effluent is supplied to TEWLIS farmers for irrigation through pipe line  
and the treated effluent is discharged directly to agricultural lands without adopting any  
advanced irrigation system like drip irrigation methods, the bio sludge (MLSS) from the  
aeration tank is found dumped and dried in open barren land haphazardly without  
adopting any scientific method, in the coal yard, coal was found partly stored under  
covered shed and a considerable quantity of Coal was found stored in open area  
leading to heavy emission from the area, the pith from the bagasse was also found  
stored in open area leading to heavy dust emission from the area.

Whereas, during the subsequent inspection of the unit by Joint Chief Environmental Engineer (M)/Salem on 18.07.2019, it has been observed that the treated effluent was pale brown in color and is disposed for irrigation area, report of analysis of well water samples collected in and around the irrigation on field is revealed that the total dissolved solid content in the well water is generally increases and not satisfying the irrigation standards, the coal storage yard was partly covered with shed and no closer shed has been provided for Bagasse pith storage yard.

Therefore, in exercise of the powers conferred under Section 33 A of Water (P&CP) Act 1974 as amended in 1988 and Section 31A of the Air (Prevention and Control of Pollution) act, 1987 as amended, Board issues the following direction to the unit of M/s. Tamil Nadu Newsprint and Papers Limited, S.F.No. S.F Nos. 622, 624, 625, 626, 627, 634, 635, 636, 637, 641, 646, 647, 648, 649/B, 654, 658, 665, 667, 671, 672, 673/1, 677, 678, 679, 680, 681, 699, 704, 708 and 710 of Punjai Pugalur Village, Manmangalam Taluk and Karur District to comply the following conditions **within 6 months:**

1. The unit shall operate and maintain the effluent treatment plant efficiently a continuously so as to satisfy the standards prescribed by the Board.
2. The unit shall adopt Drip irrigation method in TEWLIS area and shall avoid the seepage generation in the irrigation area.
3. The unit shall carryout detailed groundwater quality study in the TEWLIS area and in the adjoining affected area through reputed educational institutions such as IIT/Anna University and furnishes report with action plan for remediation.
4. The unit shall conduct a study to stoichiometrically arrive at Hazardous waste generation per tonne of production through competent agency viz. National Productivity council (NPC) and furnish report.
5. The unit shall ensure complete utilization of lime sludge in the TNPL cement plant for captive use. Further the excess hazardous waste if any shall be disposed to authorized cement kiln unit having valid authorization of TNPCB issued under Hazardous Waste and other wastes (Management and Transboundary Movement) Rules 2016.
6. The unit shall furnish the details of hazardous waste generated, accumulated and disposed for the period of 2018-19 under hazardous waste management rules 2016.
7. The unit shall ensure coal is stored in covered shed and shall avoid dust emission from the coal yard.



## TAMILNADU POLLUTION CONTROL BOARD



8. The unit shall ensure pith is stored in covered shed and shall avoid dust emission from the storage yard.

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

The receipt of the proceeding shall be acknowledged.

*S. Srinivasan*  
For Chairman 5/8/19  
5.8.2019

To:

The Chief General Manager (Production),  
M/s. TAMIL NADU NEWSPRINT AND PAPERS LIMITED,  
KAGITHAPURAM,  
Pin: 639136..

Copy to:

1. The Joint Chief Environmental Engineer(M),  
Tamil Nadu Pollution Control Board,  
Salem.
2. The District Environmental Engineer,  
Tamil Nadu Pollution Control Board,  
Karur.
3. Technical file.

No. 76, MOUNT SALAI, GUINDY, CHENNAI - 600 032.

Tel : 22353134, 22353135, 22353136, 22353137, 22353138, 22353139, 22343140, 22353141

Fax : 044 - 22353068

Email : tnpccb@md3.vsnl.net.in Web : www.tnpccb.gov.in



# TAMILNADU POLLUTION CONTROL BOARD



Recd on 9-9-19

K. J. S. S. S.

From

Thiru. Shambhu Kallollikar, I.A.S.  
Principal Secretary/Chairman (FAC),  
Tamil Nadu Pollution Control Board,  
76, Mount Salai,  
Guindy,  
Chennai – 600 032.

To :

✓ The Chief General Manager (Production),  
**M/s. TAMIL NADU NEWSPRINT AND  
PAPERS LIMITED,**  
Kagithapuram,  
Pin: 639136.

**Letter No.T1/TNPCB/F.0064/KAR/RL/W&A/2019 DATED: 03.09.2019**

**SUB:** TNPCB – Industries – M/s. Tamil Nadu Newsprint and Papers Limited, S.F.No. S.F Nos. 622, 624, 625, 626, 627, 634, 635, 636, 637, 641, 646, 647, 648, 649/B, 654, 658, 665, 667, 671, 672, 673/1, 677, 678, 679, 680, 681, 699, 704, 708 and 710 of Punjai Pugalur Village, Manmangalam Taluk and Karur District– Modification of the condition in the directions already issued vide proc. dated 02.08.2019 under Section 33(A)of the Water (Prevention and Control of Pollution) act, 1974 as Amended and Section 31A of the Air (Prevention and Control of Pollution) act, 1987 as Amended – Regarding.

- REF:**
1. ProceedingNo.T12/TNPCB/F.0064KAR/HWA/RL/KAR/2017dt: 16/02/2017
  2. Proceedings NO.T1/TNPCB/F.0064/KAR/RL/W&A/2019 dt: 02.08.2019
  3. Unit's letter No.ENV/02/2019, dated 28.08.2019.
  4. DEE's letter No.DEE/TNPCB/KAR/HW Amendment/2019 dt: 28.08.2019

\*\*\*\*\*

The Board has issued the following direction under Section 33(A)of the Water (P&CP) act, 1974 as Amended and Section 31A of the Air (P&CP) act, 1987 as amended to the unit of M/s. Tamil Nadu Newsprint and Papers Limited, S.F Nos. 622, 624, 625, 626, 627, 634, 635, 636, 637, 641, 646, 647, 648, 649/B, 654, 658, 665, 667, 671, 672, 673/1, 677, 678, 679, 680, 681, 699, 704, 708 and 710 of Punjai Pugalur Village, Manmangalam Taluk and Karur District to comply with the following condition among others vide reference second cited.

Condition No.5 *"The unit shall ensure complete utilization of lime sludge in the TNPL cement plant for captive use. Further the excess hazardous waste if any shall be disposed to authorized cement kiln unit having valid authorization of TNPCB issued under Hazardous Waste and other wastes (Management and Transboundary Movement) Rules 2016"*

The unit vide reference third cited has informed that the unit is utilizing the lime sludge( HW category 32.1. –Spent chemicals) generated from its Pulp &Paper unit in its

No. 76, MOUNT SALAI, GUINDY, CHENNAI - 600 032.

Tel : 22353134, 22353135, 22353136, 22353137, 22353138, 22353139, 22343140, 22353141

Fax : 044 - 22353068

mini cement plant and the excess quantity of lime sludge is to be disposed off to other cement plant through TNPCB authorized agencies as per the Authorization obtained vide reference first cited and hence, the industry has requested to amend the 5<sup>th</sup> condition mentioned in the direction issued 02.08.2019 as follows to facilitate enhancing participants in the tendering which would ensure the disposal of accumulation of the waste at an early period:

*"The unit shall ensure complete utilization of lime sludge in the TNPL cement plant for captive use. Further the excess hazardous waste if any shall be disposed to authorized cement kiln units/Agencies having valid authorization of TNPCB issued under Hazardous Waste and other wastes (Management and Transboundary Movement) Rules 2016"*

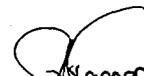
Based on unit's request DEE/Karur vide reference fourth cited has recommended for issue of amendment in the direction issued on 02.08.2019.

In view of the above, it is informed that the condition No.5 stipulated in the Direction issued to the unit vide Proceedings No.T1/TNPCB/F.0064/KAR/RLW&A/2019 dated: 02.08.2019 is hereby amended/modified and read as follows:

**Condition No.5 *"The unit shall ensure complete utilization of lime sludge (Categorized under 32.1-Spent Chemicals) in the TNPL cement plant for captive use. Further the excess hazardous waste (lime sludge categorized under 32.1-Spent Chemicals) if any shall be disposed to authorized cement kiln units/Agencies having valid authorization of TNPCB issued under Hazardous Waste and other wastes (Management and Transboundary Movement) Rules 2016"***

subject to the condition that the unit shall follow the manifest system for the disposal of the waste as stipulated in the Authorization issued under Hazardous Waste and other wastes (Management and Transboundary Movement) Rules 2016"

The receipt of the proceeding shall be acknowledged.

  
S. Nandan  
For Chairman.

Copy to:

1. The Joint Chief Environmental Engineer (M),  
Tamil Nadu Pollution Control Board,  
Salem.
2. The District Environmental Engineer,  
Tamil Nadu Pollution Control Board,  
Karur.
3. Technical file.

  
3/9/19



## TAMIL NADU POLLUTION CONTROL BOARD

From	To
Dr. K. Ravichandran M.Tech. Ph.D, District Environmental Engineer, Tamil Nadu Pollution Control Board, No, 26, Ramakrishnapuram, Karur - 639 001.	The Executive Director (Operations) M/s. Tamil Nadu Newsprint and Papers Limited, Kagithapuram Karur District - 639 136.

Letter No. DEE/TNPCB/Karur/HW-Lime sludge/2020, dt: 24/7/2020.

Sir,

**Sub:** Tamil Nadu Pollution Control Board, - O/o. District Environmental Engineer,  
Karur - M/s. Tamil Nadu Newsprint and Papers Limited, Kagithapuram -  
Lime sludge - details - Reg

**Ref:** 1. Proceeding No. T12/TNPCB/F.0064KAR/HWA/RL/KAR/2017 dated 16/02/2017

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With reference to the above, Authorization was issued under Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 vide reference cited for the Generation, Handling and Disposal of 32.1-Spent chemicals ( Lime Sludge) .In this regard, it is requested to furnish the generation, storage and disposal ( captive utilization and disposal to authorized persons) of the above waste for the past five years.

The receipt of the letter may kindly be acknowledged.

*J. 28*  
*24/7/2020*  
District Environmental Engineer,  
Tamil Nadu Pollution Control Board,  
Karur.

**TAMIL NADU NEWSPRINT AND PAPERS LIMITED**

ENV/02/20  
25 July, 2020

The District Environmental Engineer,  
Tamil Nadu Pollution Control Board,  
No: 26, Ramakrishnapuram West,  
Karur – 639 001

Sir,

Sub: Submission on details of Lime sludge for the past five years -reg.  
Ref: Lr. No. DEE/TNPCB/Karur/HW-Lime sludge/2020, dated 24/07/2020

We hereby acknowledge the receipt of letter cited under reference vide email on the subject matter.

With reference to the subject matter, the details on the Lime sludge generation, storage and disposal including captive utilization and disposed to authorized agencies from TNPL, Kagithapuram for the period between 2015-16 and 2019-20 is submitted herewith.

This is for your kind information and records.

Thanking you.

Yours faithfully,  
for M/s Tamil Nadu Newsprint and Papers Limited,

*Shree*  
GM (R&D and QC) 25/7/20

o/c

All vaues in MT (as such basis)										
YEAR	Opening Stock	Lime sludge generation	CAPTIVE UTILIZATION BY TNPL		DETAILS OF DISPOSAL MADE TO AUTHORIZED AGENCIES					Closing stock
			Lime sludge reburnt in lime kilns in Paper Plant	Lime sludge supplied to TNPL Cement Plant	Sri Anjaneya & Co 54, TNPL Road, Velayuthampalayam, Pugalur Taluk, Karur District-639136	The India Cements Limited Sankari Works, Sankari West Post, Salem District- 637303	SS Enviro Industrial Services 8/3-48A, D. Krishnasawmy (Teacher) House, Pottaneri & Post, Mettur(TK) Salem- 636453	Bhagavathiamman Steels No.5/2, Karur Main Road, Malaiveethi, Velayuthampalayam, Karur Dt-639117	Total Lime Sludge disposed to Authorized agencies	
	A	B	C	D	(i)	(ii)	(iii)	(iv)	E= (i)+(ii)+(iii)+ (iv)	F=(A+B)- (C+D+E)
2015-16	0	283659	167695	77851	19625.95	18487.5	0	0	38113	0
2016-17	0	270261	152923	96452	15222.99	3251.88	0	0	18475	2411
2017-18	2411	204768	121783	44527	19245.6	18535.24	147.09	0	37928	2941
2018-19	2941	312718	186252	104710	0	15336.71	1934.6	0	17271	7426
2019-20	7426	298056	170205	131362	0	0	0	3915.38	3915	0

To Am (RED and OI)



TAMIL NADU POLLUTION CONTROL BOARD

From	To
Dr. K. Ravichandran M.Tech. Ph.D, District Environmental Engineer, Tamil Nadu Pollution Control Board, No, 26, Ramakrishnapuram, Karur - 639 001.	The Executive Director (Operations) M/s. Tamil Nadu Newsprint and Papers Limited, Kagithapuram, Pugalur Taluk, Karur District - 639 136.

Letter No. DEE/TNPCB/Karur/HW-Lime sludge/2020, dt: 24/8/2020.

Sir,

Sub: Tamil Nadu Pollution Control Board, - O/o. District Environmental Engineer, Karur - M/s. Tamil Nadu Newsprint and Papers Limited, Kagithapuram, Pugalur Taluk, Karur District - Lime sludge - Directions issued under Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 - Reg

Ref: 1. Proceeding No. T12/TNPCB/F.0064KAR/HWA/RL/KAR/2017 dated 16/02/2017  
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With reference to the above, I am to inform that Authorization was issued to M/s. Tamil Nadu Newsprint and Papers Limited, Kagithapuram, Pugalur Taluk, Karur District under Hazardous and Other Wastes (Management and Trans boundary Movement) Rules, 2016 vide reference cited for the Generation, Handling and Disposal of 32.1-Spent chemicals (Lime Sludge).

In this regard, the following directions are issued,

1. The unit shall ensure maximum Captive utilization of Lime sludge in M/s Tamil Nadu Newsprint and Papers Ltd -Mini Cement Plant.
2. In case, if the Lime sludge is sold to authorized vendors, it shall be ensured that the waste is handled complying the conditions stipulated in the Authorisation issued under Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.

The receipt of the letter may kindly be acknowledged.

*S. D. 24/8/2020*  
District Environmental Engineer,  
Tamil Nadu Pollution Control Board,  
Karur.

Copy submitted to Joint Chief Environmental Engineer (M), Salem for favour of information and necessary action please.

*for stamp file*  
*after study - copy*  
*clm (Red) +*  
*Am (Red)*  
*(27/08/20)*

To  
AGM (Env)  
Mr Ravi  
kindly do need feel  
Am (Red and OI)  
19/20

AGM (Env) for Karur  
hand by [signature]

Am (Red +00)

TAMIL NADU POLLUTION CONTROL BOARD

<p><b>From</b> Dr. K. Ravichandran M.Tech. Ph.D, District Environmental Engineer, Tamil Nadu Pollution Control Board, No, 26, Ramakrishnapuram, Karur - 639 001.</p>	<p><b>To</b> M/s Bahavathi Amman Steels, S.F.No. 771/1,2,3,4 &amp; 774/1,2, Thotakurichi Panchai Village, Pugalur Taluk Karur District</p>
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1/3/21  
[signature]

Pl see the next page & ensure the compliance  
1/3/21

Letter No. 1/DFE/TNPCB/NGT/2021, dt: 22.2.2021.

Sir,

**Sub:** Tamil Nadu Pollution Control Board, – O/o. District Environmental Engineer, Karur – - O.A No.60 of 2020(SZ) & I.A.No.27 of 2020(SZ) before The National Green Tribunal Southern Zone, Chennai M/s Bahavathi Amman Steels, S.F.No. 771/1,2,3,4 & 774/1,2, Thotakurichi Panchai Village, Pugalur Taluk Karur District- – Directions issued – Reg.

**Ref:** 1.Proceeding No.F.0887KAR/HWA/OS/DEE/TNPCB/KAR/2019 dated 01/08/2019.  
2. Item No.01 of O.A No.60 of 2020(SZ) & I.A.No.27 of 2020(SZ).of order dated 28.01.2021

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With reference to the Proceedings 1<sup>st</sup> cited, Authorisation under Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 was issued to the unit of M/s Bahavathi Amman Steels, S.F. No. 771/1,2,3,4 & 774/1,2, Thotakurichi Panchai Village, Pugalur Taluk , Karur District for the period ending upto 31.07.2024.

As per the orders of Hon'ble National Green Tribunal Southern Zone, Chennai, in O.A No.60 of 2020(SZ) & I.A.No.27 of 2020(SZ), the following directions are issued .

1. The unit of M/s. Bahagavathi Amman Steels shall ensure that the materials sold to actual users shall have valid consent of Tamil Nadu Pollution Control Board/State Pollution Control Board and shall furnish the said details to Board.
2. The unit shall clear the balance quantity of dumped material immediately and shall utilize the same to complete the shed construction as reported.
3. The unit shall develop considerable green belt in their premises especially in the dumped material cleaned area.

The action taken on the above shall be intimated to this office early.

The receipt of the letter may kindly be acknowledged.

[signature]  
22/2/2021  
District Environmental Engineer,  
Tamil Nadu Pollution Control Board,  
Karur.

Copy to

The Executive Director (Operations)  
M/s. Tamil Nadu Newsprint and Papers Limited,  
Kagithapuram  
Karur District – 639 136.

The TNPL shall ensure complete captive utilization of lime sludge and if any material is sold out under any circumstances and it shall be ensured that the actual user of the material is having valid consent of Tamil Nadu Pollution Control Board/State Pollution Control Board.

Copy submitted to

1. Joint chief Environmental Engineer(M), TamilNadu Pollution Control Board, Salem.