



LOKNETE BABURAO PATIL AGRO INDUSTRIES LIMITED



◆ Founder : **Rajan Baburao Patil** (Ex. MLA)

◆ Chairman : **Vikrant (Balraje) Rajan Patil**

Loknete/Distl./ *64A*/2021-22

Date : 13/08/2021

To
The Nodal Officer
NGT Joint Committee
c/o Maharashtra Pollution Control Board

Subject: Our say on interim report submitted by the Expert Committee formed by NGT for case bearing original application No.274/2020.

SUBMITTED RESPECTFULLY

With reference to cited subject, we would like to bring following facts for your kind consideration.

Our factory is established in 2001 and since inception we are taking every care of our environment. We have provided full-fledged Effluent Treatment Plant (ETP) for treating the waste water and Air Pollution Control (APC) equipment so as to achieve the emission standards for treated effluent and emitted flue gases as per the pollution control board.

There is no case occurred regarding violation of environmental standards prescribed by Maharashtra Pollution Control Board (MPCB) or by MoEF&CC, under Environment (Protection) Act 1986.

From initial stage, we have planted the greenbelt more than the minimum requirement. Now also, we have developed the green belt with more than 35% having more than 9500 trees planted of different varieties like mango, Chiku, Silver Oak, Guava, Banyan, Jamun, and Palm Tree and Tamarind etc.

As per interim report of the Joint Committee, we have sent the enquires to the Govt. College of Engineering (COEP) Pune and Mahatma Phule Krushi Vidyapith, Pune for preparation of DPR regarding assessment of impact due to spillage of spent wash and its in-situ remediation treatment. The response regarding the same is awaited. We are duty bound to take all additional actions as per DPR, after receipt of the same. (Submitted enquires copy of COEP & Mahatma phune Krushi Vidyapith Pune attached herewith)

With reference to your interim report conclusions, we would like to give points-wise following clarification as per detailed below.

1. The industry has violated by not stabilizing the biodigester using organic matter, active culture, etc. prior to the operation of the distillery unit and hence was not having necessary preparedness to meet the required treatment of spent wash prescribed under the consent issued by MPCB.

➤ In the previous season 2019-20, our sugar factory and distillery unit were not in operation due to non-availability of sugar cane. Therefore, sufficient organic matter in form of spent wash was not available. Biomass in digester was almost in dormant stage, hence the biodigester could not be stabilized before starting the industry. Thus, stabilization was in progress by feeding the spent wash @ 2 m³/hr which was stored in 5 days tank, immediately after distillery started. Spent wash feed gradually increased till the biodigester biomass parameters are stabilized.

2. The industry has provided two 5 days and 30 days spent wash impervious (concrete) lagoons of 1500 and 9000m³ capacity, respectively as per conditions of CREP norms and Environmental Clearance dated 19.05.2008. However, it is gathered that 30 days spent wash impervious (concrete) lagoon was found filled with raw spent wash of 3380m³ without treatment in the biodigester. Hence the industry is non-complied w.r.t. specific condition of no. viii of the Environment Clearance (EC) granted by MoEF&CC vide F.no. J-11011/473/2006-IA-II(I) dated 19.05.2008.

➤ Due to non-availability of spent wash and active biomass in digester, the digester could not be stabilized in time. The raw spent wash in small quantity was temporarily stored in 30 days tank under this exceptional situation. However, this raw spent wash is neither used for composting nor discharged anywhere without treatment. As digester was not filled completely to its full capacity, there was margin to take this raw spent wash back to digester after stabilization, after shutting down the distillery.

3. After the accident the aforesaid 6500m³ of spent wash from the biodigester has reportedly been spread within the industry premises. The spilled area has been reported of about 6 acres and their approx. break-up are as below

- | | |
|--------------------------------|---------------|
| A) Bagasse Yard : | 1 acre |
| B) Mango orchard : | 1 acre |
| C) Bio-compost yard: | 1 acre |
| D) Distillery premises: | 1 acre |
| E) Cane Yard: | 2 acre |

However, the areas of excavated earthen pits, drains/nalah and constructed bunds may also have not yet been accounted by the industry.

➤ Almost all spent wash passed through the naturally slopping area from above mentioned 6 acre area only, except some small drain/nallah portion and this excavated earthen pits area, accounting to the tune of about 0.5 acre only. However, the soil from this area amounting to about 1050 MT was also scrapped and was mentioned in report.

4. It is informed by the industry that after the accident, proportionating of spent wash contaminated soil was done @20% along with the spent wash and press mud to prepare bio-compost. Accordingly, the industry has utilized 6,312 MT of

spent wash 15001 MT of press mud, 750 MT of boiler ash and 4696.2 MT of spent wash contaminated soil to prepare the bio-compost. Whereas, as per the above information, proportioning of spent wash contaminated soil was done @31.3% along with the spent wash and press mud to prepare bio-compost.

Total press mud available for season	23481 MT
Total scrapped contaminated soil utilized	4696 MT
Total spent wash used (sheet attached)	9878 m ³

As per above, we have mixed the soil in press mud@20%only,and not 31.3%

5. Approximately, 4400m³ of spent wash re-collected by excavating two nos. of temporary earthen pits and in addition to 600m³ of spent wash was re-collected from the nallah by construction temporary bunds.

It has also been reported that spilled spent wash did not escape from the industry premises due to containment of the spent wash by constructing the said temporary pits and bunds.

- We have recollected 5000m³ spent wash out of 6500m³ by constructed temporary bunds and excavating earthen pits and remaining 1500m³ is soaked in soil & bagasse. This soil had scrapped and used in compost preparation and bagasse was fired in boiler after drying it was reported immediately to MPCB office.

6. The produced Bio-compost samples were analysed only for pH,colour,odour,electrical conductivity,particle size,total nitrogen,potassium,phosphorous, C/N ratio,moisture content,bulk density and total organic carbon.Whereas other prescribed

were not analysed. Hence the industry has non-complied w.r.t. the office memorandum of MoEF&CC vide F.No.J-11013/55/2017-IA-II(I)dated 04.09.2018.

- We are analysing the compost sample routinely for parameters viz pH,colour,odour,electrical conductivity,particle size,total nitrogen,potassium,phosphorous,C/N ratio,moisture content,bulk density and total organic carbon; these are found within the stipulated limits.. [Ax. 1 , Page 6,7,8 ●]
- Further we would like to state that the same compost prepared is not bagged and marketed. It is sold in loose form to our farmer members, and hence FCO standards are not to be considered.

7. The industry has not yet provided the data on total quantity of bio-compost produced prior to the accident and also data on total quantity of bio-compost produced after the accident, their current storage in the premises and quantity sold.

- No compost is prepared before accident as composting process itself is started after the accident.
- We have produced total compost 15262 MT & all compost produced is sold to farmer members before rainy season and now compost yard is empty, except balanced scrapped soil 1054 MT which is covered by HDPE sheet.

Thanking You,

Yours Faithfully,

(O.S.Jogade)


Chief Executive Officer

Enclosed

- i) Compost Analysis Reports
- ii) Enquiry Received copies for DPR preparation (COEP & Agriculture college Pune)

ANNEXURE NO.1



Lab Approved by MoEF, New Delhi. (09-02-2017 to 08-02-2022)
Lab NABL Accredited - Testing - Chemical Field & Proficiency Testing Provider.
"Shree", K 3/4, S. No. 10, Erandawane Housing Society, Opposite Deenanath Mangeshkar Hospital, Pune 411 004.
• Tel.: 020 - 25460202, 25460203, 25460023, 25460033. • Email : kmn@hespl.co.in / md@hespl.co.in • www.hespl.co.in

ANALYSIS REPORT

F/LAB/04/01/17.12.2012

CLIENT'S NAME & ADDRESS	REPORT NO	HS/LAB/WA/5137A
M/s Loknete Baburao Patil Agro Industries Ltd. Laxminagar, Anagar, Tal- Mohol, Dist- Solapur	DATED	21/12/2020
	LAB REFERENCE NO	HS/LAB/WA/0511A
	DATE OF SAMPLING	15/12/2020
	DATE OF ANALYSIS	16/12/2020

DETAILS OF SAMPLE	SAMPLE COLLECTED BY	NATURE	LOCATION
Bio-compost sample	Horizon Services	Semi-solid	----

RESULTS OF ANALYSIS

SR NO	DESCRIPTION	UNIT	RESULT	FCO LIMITS
01	pH	---	7.74	Not Specified
02	Colour	---	Brown	Not Specified
03	Odour	---	Absence of Foul Smell	Not Specified
04	Electric Conductance	mg/kg	9.12	Not Specified
05	Particle Size	%	82% pass through 4.0 mm Sieve	Not Specified
06	Total Nitrogen as N	%	2.66	Min. 1.2%
07	Potassium as K	%	3.72	Min. 1.2%
08	Phosphorus as P	%	3.20	Min. 1.2%
09	C/ N Ratio	mg/kg	7.42	< 20.00
10	Moisture Content	%	32.00	Not Specified
11	Bulk Density	g/cm ³	0.52	Not Specified
12	Total Organic Carbon	%	24.35	Not Specified

For HORIZON SERVICES

M. Nagaraj

(LAB INCHARGE)



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ANALYSIS REPORT

F/LAB/04/01/17.12.2012

CLIENT'S NAME & ADDRESS M/s Loknete Baburao Patil Agro Industries Ltd. Laxminagar, Anagar, Tal- Mohol, Dist- Solapur	REPORT NO	HS/LAB/WA/6404A
	DATED	25/01/2021
	LAB REFERENCE NO	HS/LAB/WA/0626A
	DATE OF SAMPLING	20/01/2021
	DATE OF ANALYSIS	20/01/2021

DETAILS OF SAMPLE	SAMPLE COLLECTED BY	NATURE	LOCATION
Bio-compost sample	Horizon Services	Semi-solid	----

RESULTS OF ANALYSIS

SR NO	DESCRIPTION	UNIT	RESULT	FCO LIMITS
01	pH	---	7.48	Not Specified
02	Colour	---	Brown	Not Specified
03	Odour	---	Absence of Foul Smell	Not Specified
04	Electric Conductance	mg/kg	9.30	Not Specified
05	Particle Size	%	82% pass through 4.0 mm Sieve	Not Specified
06	Total Nitrogen as N	%	2.50	Min. 1.2%
07	Potassium as K	%	3.12	Min. 1.2%
08	Phosphorus as P	%	3.45	Min. 1.2%
09	C/ N Ratio	mg/kg	7.38	< 20.00
10	Moisture Content	%	30.00	Not Specified
11	Bulk Density	g/cm ³	0.55	Not Specified
12	Total Organic Carbon	%	22.10	Not Specified

For HORIZON SERVICES

M. Nayak
 (LAB INCHARGE)

ANALYSIS REPORT



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F/LAB/04/01/17.12.2012

CLIENT'S NAME & ADDRESS	REPORT NO	HS/LAB/WA/7127A
M/s Loknete Baburao Patil Agro Industries Ltd. Laxminagar, Anagar, Tal- Mohol, Dist- Solapur	DATED	22/02/2021
	LAB REFERENCE NO	HS/LAB/WA/0705A
	DATE OF SAMPLING	16/02/2021
	DATE OF ANALYSIS	17/02/2021

DETAILS OF SAMPLE	SAMPLE COLLECTED BY	NATURE	LOCATION
Bio-compost sample	Horizon Services	Semi-solid	----

RESULTS OF ANALYSIS

SR NO	DESCRIPTION	UNIT	RESULT	FCO LIMITS
01	pH	---	7.61	Not Specified
02	Colour	---	Brown	Not Specified
03	Odour	---	Absence of Foul Smell	Not Specified
04	Electric Conductance	mg/kg	9.45	Not Specified
05	Particle Size	%	82% pass through 4.0 mm Sieve	Not Specified
06	Total Nitrogen as N	%	2.66	Min. 1.2%
07	Potassium as K	%	3.22	Min. 1.2%
08	Phosphorus as P	%	3.36	Min. 1.2%
09	C/ N Ratio	mg/kg	7.10	< 20.00
10	Moisture Content	%	37.00	Not Specified
11	Bulk Density	g/cm ³	0.51	Not Specified
12	Total Organic Carbon	%	21.30	Not Specified

For HORIZON SERVICES

M. Nayak

(LAB INCHARGE)

ENQUIRY

Loknete/ Dist/ ५६ /2021-22

04/08/2021

To,
Government College
Pune.

Subject: Quotation for Detailed Project Report (DPR) of spent wash spilled
Affected area.

Respected Sir,

With reference to above cited subject & reference we want detailed study through reputed institute to prepare Detailed Project Report (DPR) which may include;

- i) Delineation of impacted area due to spillage of spent wash including pits/drains/nallahs/bunds.
- ii) Detailed soil characteristics analysis/investigation with assessment of soil qualities in the affected areas and depth levels to which the same are affected.
- iii) The soil samples beneath the ground surface (up to 50 cm) should also be collected around 1 m from periphery of the affected area as after percolation, the waste water will travel horizontally so the actual affected area needs to be determined.
- iv) Receptors and pathways analysis.
- v) Required of remediation, if any, based on the above receptors and pathways analysis.
- vi) In case remediation is required, details of required remediation treatment such as in-situ treatment (bio-remediation/phyto-remediation/air purging/etc.) or off-side treatment (soil excavation and management of excavated soil) along with engineering details & time period and cost thereof with expected target quality/goals in terms of various parameters of concern.

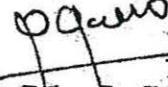
- vii) Feasibility of utilizing the remaining 1,053.8MT of excavated contaminated soil in bio-compost making ensuring compliance of all parameters stipulated under FCO standard. In case bio-composting is not feasible, details of alternate management options of the same be also provide.
- viii) We have scraped the soil bellow 40 cm of surface nearly about 5750 M.T. from which 1053.8 MT remains. It's analysis to be done. This scraped soil is mixed in compost, Remaining 1053.8 M.T. scraped soil will be mixed in coming season. You have to suggest weather this scrapped soil can mix as per FCO standard. If not what necessary action shall be taken.

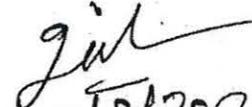
Now, we want Detailed Project Report (DPR) of spent wash spilled affected area including above mentioned points

Hence you are requested to send quotation immediately.

Thanking you.

Yours Faithfully,


(Mr. O. S. Jogade)
Chief Executive officer


09/08/2024
आवक लिपीक
अभियांत्रिकी महाविद्यालय
पुणे-४११००५.

GSTIN No. 27AACCL1665M1Z7

PAN No. AACCL165M

Gram: LOKNETE SUGAR, MOHOL

**Loknete Baburao Patil Agro Industries Limited, Laxminagar, Angar,
Tal-Mohol, Dist -Solapur, Pin- 413 214**

E-mail : loknete_sugar@rediffmail.com Phone No. (02189) 248699, 248799 Fax: 248899

ENQUIRY

Loknete/ Dist/ 585/2021-22

04/08/2021

To,
The Principal,
Mahatma Phule Krishi Vidyapith,
Shivajinagar, Pune.

**Subject: Quotation for Detailed Project Report (DPR) of spent wash spilled
Affected area.**

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With reference to above cited subject & reference we want detailed study through reputed institute to prepare Detailed Project Report (DPR) which may include;

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- ii) Detailed soil characteristics analysis/investigation with assessment of soil qualities in the affected areas and depth levels to which the same are affected.
- iii) The soil samples beneath the ground surface (up to 50 cm) should also be collected around 1 m from periphery of the affected area as after percolation, the waste water will travel horizontally so the actual affected area needs to be determined.
- iv) Receptors and pathways analysis.
- v) Required of remediation, if any, based on the above receptors and pathways analysis.
- vi) In case remediation is required, details of required remediation treatment such as in-situ treatment (bio-remediation/phyto-remediation/air purging/etc.) or off-side treatment (soil excavation and management of excavated soil) along with engineering details & time period and cost thereof with expected target quality/goals in terms of various parameters of concern.

Handwritten signature and date:
9/8/21

vii) Feasibility of utilizing the remaining 1,053.8MT of excavated contaminated soil in bio-compost making ensuring compliance of all parameters stipulated under FCO standard. In case bio-composting is not feasible, details of alternate management options of the same be also provide.

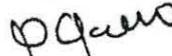
viii) We have scraped the soil bellow 40 cm of surface nearly about 5750 M.T. from which 1053.8 MT remains. It's analysis to be done. This scraped soil is mixed in compost, Remaining 1053.8 M.T. scraped soil will be mixed in coming season .You have to suggest weather this scrapped soil can mix as per FCO standard .If not what necessary action shall be taken.

Now, we want Detailed Project Report (DPR) of spent wash spilled affected area including above mentioned points

Hence you are requested to send quotation immediately.

Thanking you.

Yours Faithfully,



(Mr. O. S. Jogade)
Chief Executive officer

Loknete Baburao Patil Agro Industries Limited , Laxminagar, Angar, Tal.Mohol.Dist.Solapur.

Sr. No	Particulars	Date	Qty (Press - mud)	Spent Wash Used on Press-mud (in M3)	Qty (Boiler Ash)	Qty Soil Mixing.	Qty Soil Bal.
1	Sugar Factory Started	23.10.2020	0	0	0	0	0
2	Already Presmud + Ash Balance on dated	15.12.2020	8480	3567.536	424	0	5750
3	Soil Mixing work started @ 20% On Pres-mud.	15.12.2020	0	0	0	565	5185
4		16.12.2020	0	0	0	565	4620
5		17.12.2020	0	0	0	566	4054
6		18.12.2020	480	201.936	24	96	3958
7		19.12.2020	160	67.312	8	32	3926
8		20.12.2020	160	67.312	8	32	3894
9		21.12.2020	160	67.312	8	32	3862
10		22.12.2020	160	67.312	8	32	3830
11		23.12.2020	160	67.312	8	32	3798
12		24.12.2020	160	67.312	8	32	3766
13		25.12.2020	160	67.312	8	32	3734
14		26.12.2020	160	67.312	8	32	3702
15		27.12.2020	160	67.312	8	32	3670
16		28.12.2020	160	67.312	8	32	3638
17		29.12.2020	160	67.312	8	32	3606
18		30.12.2020	160	67.312	8	32	3574
19		31.12.2020	160	67.312	8	32	3542
		Total	11040	4644.528	552	2208	0
1		01.01.2021	160	67.312	8	32	3510
2		02.01.2021	160	67.312	8	32	3478
3		03.01.2021	160	67.312	8	32	3446
4		04.01.2021	160	67.312	8	32	3414
5		05.01.2021	160	67.312	8	32	3382
6		06.01.2021	160	67.312	8	32	3350
7		07.01.2021	160	67.312	8	32	3318
8		08.01.2021	160	67.312	8	32	3286
9		09.01.2021	160	67.312	8	32	3254
10		10.01.2021	160	67.312	8	32	3222
11		11.01.2021	160	67.312	8	32	3190
12		12.01.2021	160	67.312	8	32	3158
13		13.01.2021	160	67.312	8	32	3126
14		14.01.2021	160	67.312	8	32	3094
15		15.01.2021	160	67.312	8	32	3062
16		16.01.2021	160	67.312	8	32	3030

17		17.01.2021	160	67.312	8	32	2998
18		18.01.2021	160	67.312	8	32	2966
19		19.01.2021	160	67.312	8	32	2934
20		20.01.2021	160	67.312	8	32	2902
21		21.01.2021	160	67.312	8	32	2870
22		22.01.2021	160	67.312	8	32	2838
23		23.01.2021	160	67.312	8	32	2806
24		24.01.2021	160	67.312	8	32	2774
25		25.01.2021	160	67.312	8	32	2742
26		26.01.2021	0	0	0	0	2742
27		24.01.2021	160	67.312	8	32	2710
28		25.01.2021	160	67.312	8	32	2678
29		26.01.2021	160	67.312	8	32	2646
30		27.01.2021	160	67.312	8	32	2614
31		28.01.2021	160	67.312	8	32	2582
32		29.01.2021	160	67.312	8	32	2550
33		30.01.2021	160	67.312	8	32	2518
34		31.01.2021	160	67.312	8	32	2486
		Total	5280	2221.296	264	1056	
1		01.02.2021	160	67.312	8	32	2454
2		02.02.2021	160	67.312	8	32	2422
3		03.02.2021	160	67.312	8	32	2390
4		04.02.2021	160	67.312	8	32	2358
5		05.02.2021	160	67.312	8	32	2326
6		06.02.2021	160	67.312	8	32	2294
7		07.02.2021	160	67.312	8	32	2262
8		08.02.2021	160	67.312	8	32	2230
9		09.02.2021	160	67.312	8	32	2198
10		10.02.2021	160	67.312	8	32	2166
11		11.02.2021	160	67.312	8	32	2134
12		12.02.2021	160	67.312	8	32	2102
13		13.02.2021	160	67.312	8	32	2070
14		14.02.2021	160	67.312	8	32	2038
15		15.02.2021	160	67.312	8	32	2006
16		16.02.2021	160	67.312	8	32	1974
17		17.02.2021	160	67.312	8	32	1942
18		18.02.2021	160	67.312	8	32	1910
19		19.02.2021	160	67.312	8	32	1878
20		20.02.2021	160	67.312	8	32	1846
21		21.02.2021	160	67.312	8	32	1814
22		22.02.2021	160	67.312	8	32	1782
23		23.02.2021	160	67.312	8	32	1750
24		24.02.2021	160	67.312	8	32	1718
25		25.02.2021	160	67.312	8	32	1686
26		26.02.2021	160	67.312	8	32	1654
27		27.02.2021	160	67.312	8	32	1622
28		28.02.2021	160	67.312	8	32	1590
		Total	4480	1884.736	224	896	

1	01.03.2021	115	48.3805	5.75	23	1567
2	02.03.2021	115	48.3805	5.75	23	1544
3	03.03.2021	115	48.3805	5.75	23	1521
4	04.03.2021	115	48.3805	5.75	23	1498
5	05.03.2021	115	48.3805	5.75	23	1475
6	06.03.2021	115	48.3805	5.75	23	1452
7	07.03.2021	115	48.3805	5.75	23	1429
8	08.03.2021	115	48.3805	5.75	23	1406
9	09.03.2021	115	48.3805	5.75	23	1383
10	10.03.2021	110	46.277	5.5	22	1361
11	11.03.2021	110	46.277	5.5	22	1339
12	12.03.2021	110	46.277	5.5	22	1317
13	13.03.2021	110	46.277	5.5	22	1295
14	14.03.2021	110	46.277	5.5	22	1273
15	15.03.2021	110	46.277	5.5	22	1251
16	16.03.2021	110	46.277	5.5	22	1229
17	17.03.2021	110	46.277	5.5	22	1207
18	18.03.2021	110	46.277	5.5	22	1185
19	19.03.2021	110	46.277	5.5	22	1163
20	20.03.2021	110	46.277	5.5	22	1141
21	21.03.2021	110	46.277	5.5	22	1119
22	22.03.2021	110	46.277	5.5	22	1097
23	23.03.2021	110	46.277	5.5	22	1075
24	24.03.2021	106	44.5942	5.3	21.2	1053.8
	Total	2681	1127.9	134.05	536.2	
		23481	9878.46	1174	4696.2	