

BEFORE THE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH NEW DELHI

O.A. NO. 107/2020

In Re: News item published in the local daily
"Indian Express Sunday Express" dated 28.06.2020
titled "Gas Leak in Agro Company Claims life of One"

**WRITTEN SUBMISSIONS ON BEHALF OF RESPONDENT I.E.
M/S. SPY AGRO INDUSTRIES LIMITED.**

PAPER BOOK

**ADVOCATE FOR THE RESPONDENT : G.N. REDDY,
Flat No. 5,
P-13, Malviya Nagar,
New Delhi-110017,
Cell No: 9818172999,
Email Id: gnreddyactindia@hotmail.com**

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In Re: News item published in the local daily
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WRITTEN SUBMISSIONS ON BEHALF OF RESPONDENT I.E.
M/S. SPY AGRO INDUSTRIES LIMITED.

1. That the Respondent Company is filing this written submissions with respect to the **suo-motu** proceedings initiated by this Hon'ble Tribunal taking into consideration unfortunate events of accidents occurred on 27.06.2020 and 05.08.2020 caused due to Ammonia gas leakage accident and during boiler repair at Nandyal in Kurnool District, Andhra Pradesh in the factory premises of Respondent i.e. M/s. S.P.Y. Agro Industries Limited, resulting in death of two persons.
2. That the Respondent Company is modern grain-based distillery unit located at Udumaipuram village, 3 KM away from Nandayal and is engaged in production of superior grade of Extra Neutral Alcohol (Extra Neutral Alcohol) and almost 600 to 800 number of employees works in the factory.
3. That without prejudice to the legal contention regarding exercise of **suo-motu** jurisdiction by this Hon'ble Tribunal the Respondent Company submits herein that the aforesaid events were neither deliberate nor intentional and was merely accident and it does not involve substantial question of environment. Further the victims have been sufficiently compensated in compliance with the order of this Hon'ble Tribunal.

have been sufficiently compensated in compliance with the order of this Hon'ble Tribunal.

4. That the Joint Committee Report is denied to the extent that management of the unit is responsible for the accident. It is denied that the main cause of accidents were on account of failure to comply with the safety practices.
5. It is submitted that the Respondent Company has always complied with the guidelines regarding safety measures issued by APPCB from time to time. It is submitted that even prior to the unfortunate event of accident, the Respondent Company had duly complied with the circular no. 11/APPCB/CFE/RO-ZO/HO/2010 dated 13.05.2020 issued by A.P. Pollution Control Board for compliance with the provisions of various Acts/Rules by the industries to resume the operation after COVID-19 lockdown. Compliance report was also duly submitted by the Respondent to the Environmental Engineer A.P. Pollution Control Board, Regional office, Kurnool vide its letter dated 22.05.2020. True Copies of the said Circular dated 13.05.2020 and letter dated 22.05.2020 are annexed hereto as **Annexure-R-1 and R-2** respectively.
6. It is submitted that Joint Committee Report submitted before this Hon'ble Tribunal is erroneous to the extent that the Respondent Company has not complied with the letter dated 02.06.2020. (Annexure-R-3) and show cause notice dated 12.06.2020 issued by Andhra Pradesh Pollution Control Board (hereinafter referred to as 'APPCB'). True Copies of the Letter dated 02.06.2020 and show cause notice dated 12.06.2020 issued by APPCB are annexed hereto as **Annexure-R-3 and R-4**.

7. With reference to the letter dated 02.06.2020 issued by APPCB it is submitted that Respondent Company had already complied with the said letter vide letter dated 22.05.2020 which was sent in response to the show cause notice dated 13.05.2020. Thus 02.06.2020 letter was sent by APPCB without taking into the consideration of Respondent Company letter dated 22.05.2020.
8. With reference to the show cause notice dated 12.06.2020 issued by APPCB it is submitted that the said show cause notice was duly replied by the Respondent Company vide its letter dated 15.06.2020. Further, the Respondent in its letter dated 30.06.2020 addressed to the Environment Engineer APPCB submitted the compliance report dated 30.06.2020. In its letter dated 13.07.2020, the Respondent had duly informed the APPCB that with respect to safety hazard audit and onsite emergency plan 50% of amount to M/s Varaanga Engineers Pvt. Ltd. for safety hazard audit. Regarding the emergency plan the Respondent had informed the APPCB that it is in process of preparation of offsite emergency plan in consultation with District Administration. True Copies of the letters dated 15.06.2020, 30.06.2020 and 13.07.2020 are annexed hereto as **Annexure- R-5, Annexure-R-6 and Annexure-R-7** respectively.
9. It is denied that the Respondent has operated the plant from 19.07.2020 to 22.07.2020, from 29.07.2020 to 31.07.2020, from 01.08.2020 to 04.08.2020 and from 10.09.2020 to 18.09.2020 and has violated the Stop production Order dated 13.07.2020. On the contrary it is submitted that the Respondent has vide its letter dated 17.07.2020 has intimated the Chairman APPCB, Vijaywada that it has stopped the production five days back and informed Regional office Kurnool Orally that due to COVID-19 IN Nandyal office staff

that no body is attending duty. The Respondent in the said letter had also requested APPCB to permit it operate power generation plant for lighting for Maintenance Work purpose without which maintenance work cannot be completed. True copy of the said letter dated 17.07.2020 is annexed hereto as **Annexure R-8**.

10. That vide letter 18.07.2020 followed by letter dated 10.08.2020 and letter dated 07.09.2020, the Respondent had duly informed the APPCB about the compliance of its stop production order dated 13.07.2020. True copies of the said letters dated 18.07.2020, 10.08.2020 and 07.09.2020 are annexed hereto as **Annexure- R-9, Annexure- R-10 and Annexure-R-11** respectively.

11. It is submitted that the Respondent has vide its letter dated 06.10.2020 has informed to the Member Secretary, APPCB that the prohibitory order has been revoked by Deputy Chief inspector of factories of Factories Department vide its letter dated 05.10.2020 taking into consideration the compliance by the Respondent. That the Respondent has vide the said letter further informed the APPCB that it has complied with all the conditions of APPCB Stop production Order dated 13.07.2020 along with requisite documents. True copy of the said letter dated 06.10.2020 is marked hereto as **Annexure- R-12**.

12. That the Respondent has also submitted the undertaking to the effect that it will obey the Orders of Hon'ble National Green Tribunal in O.A. No. 107 and will pay the environmental compensation as recommended by the Hon'ble Tribunal. The said undertaking was submitted by the Respondent along with the letter dated 12.10.2020 and letter dated 19.11.2020. Further, the Respondent in compliance of the letter dated 05.10.2020 issued by APPCB, the Respondent has

also submitted the compliance Report along with its letter dated 12.10.2020 addressed to Environmental Engineer APPCB read with letter dated 16.10.2020 addressed to Deputy Chief Inspector of Factories. True copies of the letter dated 05.10.2020 is annexed hereto as **Annexure-R-13** and the said letters dated 12.10.2020, 16.10.2020 and 19.11.2020 is annexed hereto as **Annexure-R-14, Annexure R-15 and Annexure-R-16** respectively.

13. With respect to the observation of Committee constituted by this Hon'ble Tribunal that the Respondent operated that plant 4 times even after issue of stop production orders by APPCB on 13.07.2020 it is further submitted that the Respondent had operated the plant only on partial basis just to prevent environmental hazard. The Respondent vide its letter dated 29.10.2020 in reply to Closure Order dated 29.10.2020 issued by APPCB has duly brought this fact to the notice of the Joint Chief Engineer APPCB with requisite explanations which is not repeated herein for the sake of brevity. The Respondent in its letter dated 29.10.2020 had also requested the APPCB to issue revocation orders sympathetically to the Respondent as hundreds of employees and their families are depending on this unit. True copies of the Closure Order dated 29.10.2020 and the letter dated 29.10.2020 sent by the Respondent is annexed here to as **Annexure-R-17 and Annexure-R-18**.

14. That due to the aforesaid closure order dated 29.10.2020 and stop production order dated 13.07.2020, the Respondent is running under huge losses which in turn affecting the livelihood of almost 800 workers/employees of the company.

15. That in spite of its various letters dated 20.10.2020 sent to APPCB and Hon'ble National Green Tribunal Committee member requesting

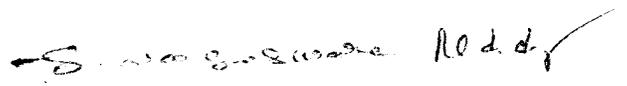
for revocation of stop production order, it has not received any reply due to which the Respondent suffering huge losses every day which cannot be calculated in monetary terms. True copies of the said letters dated 20.10.2020 is annexed hereto as **Annexure-R-19(colly.)**

16. That if the aforesaid closure order dated 29.10.2020 and stop production order dated 13.07.2020 is not revoked, the Respondent will suffer irreparable loss which cannot be calculated in monetary terms.

17. That the Respondent Company craves leave to make further submissions at the time of hearing of the matter.

In the aforementioned facts and circumstances it is respectfully submitted that since there is **no Environmental Damage/Violation** is involved, appropriate direction may be given to the APPCB to revoke the Closure Order dated 29.10.2020 and Stop production Order dated 13.07.2020 in favour of the Respondent Company on which livelihood of almost 800 worker/employees depends.

DRAWN AND FILED BY


(G.N. REDDY)

NEW DELHI

DATED: 04.12.2020

Annexure-R/1

ANDHRA PRADESH POLLUTION CONTROL BOARD
D. No. 33-26-14 D/2, Near Sunrise Hospital, Pushpa Hotel Centre,
Chalamalavari Street, Kasturibaipet, Vijayawada - 520 010
Website: www.pcb.ap.gov.in

7

Circular No: 11/APPCB/CFE/RO-ZO/HO/2010-

13/05/2020

Sub: APPCB –Compliance with provisions of various Acts / Rules by the industries to resume the operations in the state of Andhra Pradesh after COVID-19 lockdown –Instructions – Issued- Reg.

Ref: 1. Relaxation of norms by the Government after Novel Corona Virus (COVID-19) lock down in the State.
2. Directions issued by the CPCB vide order dt. 08.05.2020.

@@@

You are aware that the industries were permitted by the Government to resume their operations after COVID-19 lockdown. Accordingly, some of the industries making arrangements to resume their operations. M/s. L.G. Polymers (I) Pvt. Ltd., R.R. Venkatapuram, Visakhapatnam is one of such industries trying to resume operations after closure of 40 to 45 days. During that process, Styrene was leaked out (early hours of 07.05.2020) and resulted in loss of human lives and hundreds of people were hospitalized due to respiratory problems. Hence Central Pollution Control Board issued certain directions vide reference 2nd cited to the State PCBs to ensure compliance of the provisions of various Acts and Rules issued thereunder. A copy of the same is enclosed for ready reference. The directions are as following:

- i. A proper safety and hazard audit should be undertaken by all units before resuming operation. The SPCB / PCCs shall direct all the units that manufacture, store or import hazardous chemicals to resume their operations after COVID-19 lockdown, only after they have taken adequate and necessary steps to prevent the occurrence of any chemical leakage / accident.
- ii. The SPCBs shall ensure that pollution control equipment, connectivity of OCEMS with CPCB /SPCB sewers, effluent treatment plants including safety equipment and its machineries shall be kept in good operable conditions before resuming operation in present COVID-19 situation.
- iii. The SPCBs shall ensure that all the units shall take utmost care in handling hazardous chemicals by using trained manpower.
- iv. The SPCBs shall closely monitor the situation and ensure that environmental norms are not violated by any unit.
- v. The SPCBs shall direct all such units to ensure safety of the workers and residents in the vicinity
- vi. The SPCB shall ensure that any unit involved in manufacture, storage and import of hazardous chemicals shall comply with stipulated provisions of The Manufacture, Storage and Import of Hazardous Chemical Rules, 1989 and The Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996 without fail.

This Circular comes into force with immediate effect and shall be scrupulously followed by all the Officers of the Board. Further, all the Regional Officers are directed to co-ordinate with the Factories Dept. Fire Services Dept etc.. to ensure implementation of above Rules and see that Hazardous and Safety Audit shall be undertaken by all the hazardous and chemical units before resuming operations. The compliance reports on the directions shall be sent to the JCEE. UH-2. Head Office with in 15 days to take further necessary action.

Encl: As above.

**VIVEK YADAV IAS, MS(VY), O/o MEMBER SECRETARY-APPCB
VIVEK YADAV IAS**

To

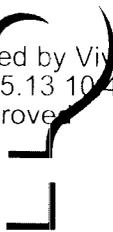
- a. All the Zonal Officers and Regional Officers.
- b. All the Unit Heads at Head Office.



" T. C. "

Signature Not Verified

Digitally signed by Vivek Yadav
Date: 2020.05.13 10:49:22 IST
Reason: Approved





Annexure-R/2

S.P.Y. Agro Industries Limited 9

CIN No.: U01100TG2005PLC045887

Date : 22.05.2020

To,
Environmental Engineer,
A.P. Pollution Control Board,
Regional Office, Kurnool.

Dear Sir,

Sub: -Submission of Compliance report – Reg.

Ref: -Circular No. 11/APPCB/CFE/RO-ZO/Ho/2010 dt 13.05.2020.

With reference to the above we herewith submit the **Compliance report details enclosed.**

Thanking you sir,

**Yours Faithfully,
For S.P.Y Agro Industries Limited**

Authorized Signatory



Regd. Office : D.No. 8-3-833, Plot No. 188, 1st Floor, Phase - II, Kamalapur Colony, Hyderabad - 500 073. T.S. INDIA
E-mail: spyagroindustries@gmail.com

Works : New Industrial Estate, Sy. No. 446 to 449, APIIC, Udumalpur, Nandyal, Kurnool Dt.-518 502. A.P. INDIA
Phone: +91 8514 222084, Fax: 08514-222082, E-mail: spyagro_nandigroup@yahoo.com

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**COMPLIANCE REPORT FOR CIRCULAR No.11/APPCB/CFE/RO-ZO/HO/2010, DTD.
13-05-2020**

S.No.	DIRECTIONS	COMPLIANCE
01.	A proper safety and hazard audit should be undertaken by all units before resuming operation. The SPCB/PCCs shall direct all the units that manufacture, store or import hazardous chemicals to resume their operations after COVID-19 lockdown, only after they have taken adequate and necessary steps to prevent the occurrence of any chemical leakage / accident.	Our industry is manufacturing essential inputs to supply to Sanitizing for ENA and Distiller Dried Grain Soluble (Animal feed) items manufacturing units.
02	The SPCBs shall ensure that pollution control equipment, connectivity of OCEMS with CPCB/SPCB sewers, effluent treatment plants including safety equipment and its machineries shall be kept in good operable conditions before resuming operation in present COVID-19 situation.	All our OCEMS, are in place and connected to CPCB/APPCB portals.
03	The SPCBs shall ensure that all the units shall take utmost care in handling hazardous chemicals by using trained man power.	Trained man power is available round the clock to operate the operations ensuring any untowards incidents.
04	The SPCBs shall closely monitor the situation and ensure that environmental norms are not violated by any unit.	All our environmental emissions and discharges are within the limits.
05	The SPCBs shall direct all such units to ensure safety of the workers and residents in the vicinity.	We are ensuring the Safety of the workers during COVID-19 pandemic by providing sanitizers, masks, face shields and regularly monitoring body temperature while reporting the to the duty.
06	The SPCB shall ensure that any unit involved in manufacture, storage and import of hazardous chemicals shall comply with stipulated provisions of the manufacture, storage and import of hazardous chemicals rules, 1989 and The Chemicals Accidents (Emergency Planning Preparedness and Response) Rules, 1996 without fail.	Safety Report is in place and updated regularly. Regular mock drill are conducted once in six months. Safety committee meetings are held every month and recommendations are implemented.

For S.P.Y. Agro Industries Limited

Director
Director

|| T. c. ||



Annexure-R/3

11

ANDHRA PRADESH POLLUTION CONTROL BOARD
ZONAL OFFICE: KURNOOL

1st Floor, Shankar Shopping Complex, Krishna Nagar Main Road

Phones : 233619

Lr.No. APPCB/ZO-KNL/MAH/2020

Dt: 02.06.2020

Sub: APPCB – ZO- KNL –Compliance with the provisions of Storage and import of Hazardous Chemicals Rules, 1989 and The Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996 – Instructions – Issued- Reg.

Ref: 1. Directions issued by the CPCB vide order dt. 08.05.2020
2. List of industries communicated by director of industries, A.P., Dt. 09.05.2020
3. B.O. Circular No. 11/APPCB/CFE/RO-ZO/HO/2010, dt. 13.05.2020
4. T.O.Lr.No.APPCB/ZO-KNL/HWA/2020, dt. 22.05.2020

With reference to the 1st cited above, CPCB has issued circular with regard to the Strict safety precautions to be taken before resuming operation of units involved in manufacture, storage and import of hazardous chemicals and the industries shall comply with stipulated provisions of the Manufacture, Storage and Import of Hazardous Chemical Rules, 1989 and The Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996 without fail and in turn, the Member Secretary, APPCB issued circular duly communicating the circular issued by CPCB.

You are here by directed to ensure the compliance of the following during operation of industry as circulated by CPCB.

- i. A proper safety and hazard audit should be undertaken by all the units before resuming operations. The industries shall follow the Rules stipulated that manufacture, store or import hazardous chemicals while resuming their operations after COVID-19 lockdown, only after they have taken adequate and necessary steps to prevent the occurrence of any chemical leakage / accident
- ii. The industry shall ensure the pollution control equipment connectivity of OCEMS with CPCB /SPCB servers, effluent treatment plants including safety equipment and its machineries shall be kept in good operable condition before resuming operation in present COVID-19 situation.
- iii. The industry shall ensure all the units take utmost care in handling hazardous chemicals by using trained manpower
- iv. The industry shall closely monitor the situation and ensure that environmental norms are not violated by any unit.
- v. The industry shall ensure safety of the workers and residents in the vicinity.

In addition to the above, you are hereby informed to furnish the safety measures, off site / onsite emergency plans, disaster management plan and risk analysis report carried by the industry.

Keeping in view of the CPCB circular and Board circular you are once again informed to keep a close watch on the maintenance of safety measures with due emphasis on the awareness of the workers with regard to the safety measures and protocol to be maintained.

A detailed write up on the Hazardous chemicals, storage & handling and the safety measures adopted has to be submitted along with the above mentioned reports with photographic evidence within 10 days from the date of receipt of this letter.

W. Raju
26/6/20
JOINT CHIEF ENVIRONMENTAL ENGINEER
ZONAL OFFICE, KURNOOL

To
M/s SPY Agro Industries Ltd.,
Sy.No.446 to 449, APIIC, New Industrial Estate,
Udumulapuram, Nandyal (M), Kurnool district – 518502.

11 T.C. 11
[Signature]



ANDHRA PRADESH POLLUTION CONTROL BOARD

REGIONAL OFFICE, KURNOOL

1st Floor, Shankar Shopping Complex, Krishna Nagar Main Road, Kurnool – 518 002

B Y Muni Prasad
Environmental Engineer

Tele : 08518- 236912
Email : roknl-eel@appcb.gov.in

12

NOTICE NO:KNL-205/PCB/RO/KRNL/Notice-2020-82.

Dated.12.06.2020

SHOWCAUSE - NOTICE

Sub: APPCB – R.O – Kurnool – M/s S.P.Y. Agro Industries Ltd., APIIC, New Industrial Estate, Udumulapuram (V), Nandyal (M), Kurnool District – Complaint received from Assistant Editor (Political affairs), The Times of India, Amaravathi through Whatsapp regarding odour nuisance from M/s S.P.Y. Agro Industries Ltd Nandyal (M), Kurnool District – Orders of Member Secretary – **Show cause Notice** - Issued - Reg.

Ref:-
1. APPCB, Regional office, Kurnool, Notice dated.04.07.2018.
2. APPCB Consent Order No. APPCB/KNL/KNL/17872/ HO/CFO/2016, dt: 03.03.2020.
3. Complaint from Assistant Editor (Political affairs), The Times of India, Amaravathi by this office on 10.06.2020
4. Orders of the Member Secretary, APPCB, Vijayawada on 10.06.2020.
5. Inspection of the industry and surrounding area by PCB officials on 11.06.2020.

* * * * *

WHEREAS, you are operating the industry in the name of M/s S.P.Y. Agro Industries Ltd., APIIC, New Industrial Estate, Udumulapuram (V), Nandyal (M), Kurnool District and is a grain based distillery manufacturing Spirit- 134 KLD (or) Extra Neutral Alcohol (ENA) – 125 KLD & operating Co-Generation Power Plant.

WHEREAS, vide reference 1st cited above, the Regional office, Kurnool has issued a Noticed to your industry based on the complaint received from Sri Bondala Hemendra, 25th ward, Nandyal, Kurnool District through Meekosam (1100 Grievances) with regard to odour nuisance from your industry with a direction to take immediate measures for rectification of dryers and also show cause as to why legal action shall not be initiated against your industry under section 31 (A) of the Air (Prevention and Control of Pollution) Act, 1987 and its amendments thereof for causing Air pollution in the surrounding area. In reply you have informed that industry was taken measures to arrest the odour nuisance during drying of wet cake coming from decanter, but still complaints are receiving from your industry for causing odour nuisance in the surrounding areas this implies you have not taken adequate measures for controlling odour nuisance.

WHEREAS, the Board vide reference 2nd cited issued Consent order to your industry duly stipulating a special condition that “**there shall not be any odour problem and ground water pollution in the surrounding villages due to distillery project**”, but **the same was not complied by your industry.**

WHEREAS the Board vide reference 3rd cited has received complaint from Assistant Editor (Political affairs), The Times of India, Amaravathi through Whatsapp

13

regarding odour nuisance from M/s S.P.Y. Agro Industries Ltd., APIIC, New Industrial Estate, Udumulpuram (V), Nandyal (M), Kurnool District stating that odour nuisance from your industry is causing health problems to the residents of the Nandyal town such as vomiting, head ache, nausea due to high level of smell & air pollution and requested to take necessary action for controlling the odour nuisance.

WHEREAS the Board Officials inspected your industry and the surrounding area on 11.06.2020 and observed the following:

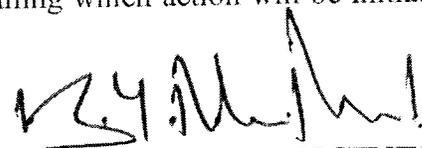
1. The industry was established over an extent of 43 Acres with a project cost of about Rs.289.10 Crores and is surrounded by **East:** Private Vacant land followed by Agricultural lands., **West:** Agricultural lands, **North:** Proposed residential plots developed by Ganesh Nagar and Maruthi Nagar Development, and **South:** M/s Nandi Plasticisers and other industrial activities.
2. The industry is manufacturing the spirit- 134 KLD (or) Extra Neutral Alcohol (ENA) – 125 KL, the main raw materials are grain flour @ 60% starch content (Maize, Sorghum, Bajra and Rice) – 339 TPD, Enzymes – 0.5 TPD & Bio Mass (Rice husk) – 120 TPD. The industry is generating spent wash from the process and it will be taken into the decanter so as to get the wet cake (120MTPD) and it will be sent for cattle feed. After decanter, the effluent(thin slop) will be taken into bio-digester. The outlet of bio digester is connected to secondary ETP consisting of pre-aeration, pre-clarifier, aeration tank- 2Nos., clarifier - 2Nos.
3. After treatment in ETP, the treated waste water is mixed with the other effluents from utilities and further treated in RO systems of capacity 1100 & 450 m³/day. The RO permeate is recycled in to the process and the RO rejects evaporated in the Multiple Effective Evaporator (MEE) of capacity – 100 KLD. The MEE condensate is utilized for cooling tower makeup and the concentrate from the MEE is disposed in spray dryer of capacity – 45 m³/day.
4. **During inspection, it was observed that, the control equipment i.e., scrubber attached to the driers is inadequate to control emissions generated from drier.**
5. Whereas, the industry representative informed that due to mechanical problem (FD Fan shaft break down) and labour problem for feeding the wet cake into the hopper of the drier, the industry has stored huge quantities of wet cake in the premises. The plant was made shutdown on 6th & 7th of this month to avoid further generation of wet cake and to rectify the mechanical problem. After rectification of the problem the total quantity of wet cake was fed into drier and the dried material bagged and kept in the drier room for disposal.
6. As per the CFO order dated.03.03.2020, the industry has to store the ash in closed shed only and utilize total quantity of ash for manufacture of Bricks, the industry is storing huge quantities of coal ash adjacent to the boiler there by causing air pollution to the surroundings during wind blows.
7. As per the Consent order, the Rain water shall not be allowed to mix with either trade or domestic effluents and shall maintain storm water drains properly. Whereas, the industry is

14

not maintain the storm water drains properly and allowing the rain water to mix with trade effluents, runoff water from coal ash area and domestic water, lot of stagnation of coloured water in the storm water drains, on the roads and around the ETP units thereby causing ground water pollution. Also, the effluent treatment plant is in very bad shape and in dilapidated condition.

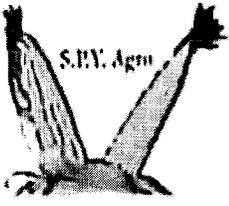
8. As per the Consent order, the industry was directed to provide dyke wall at the process and ETP area for collection of spillages. Whereas, the industry has not provided dyke walls at the process area and ETP area, the spillages were overflowed into drains and lot of stagnation observed on the roads and formed cess pools in several areas.
9. **At present, the industry is generating about 120 to 130 Tons of wet cake per day whereas the industry is having a drier of capacity 50 Tons/day only which is inadequate to dry the wet cake on daily basis. It is observed that the industry is utilizing the driers of capacity – 100 TPD existing in their sister concern unit i.e., M/s.Nandi Grain Derivatives (P) Ltd., which is not having valid consents of the Board.**
10. From the above, it is evident the industry is operating the driers without adequate scrubbing capacity **thereby lot of emissions were dispersed into the surrounding areas i.e., Bommalasatram and Kranti nagar and caused lot of inconvenience to the residents of Nandyal Town and also causing health problems to the residents of the Nandyal town such as vomiting, head ache, nausea due to high level of smell & air pollution.**

Hence, you are hereby directed to show cause as to why legal action shall not be initiated against your industry under section 33 (A), 44 of Water (Prevention and Control of Pollution) Act, 1974 and under section 31 (A), 37 of the Air (Prevention and Control of Pollution) Act, 1987 and Amendments thereof, for violation of CFO order conditions and thereby causing odour nuisance and ground water pollution in the surrounding area. You are also directed to furnish the reply **within 5 days** from the date of receipt of this notice, failing which action will be initiated against your industry under above said acts.


ENVIORNMENTAL ENGINEER

To
M/s S.P.Y. Agro Industries Ltd.,
APIIC, New Industrial Estate,
Udumulapuram (V), Nandyal (M), Kurnool District.

✓
" T.C. " "



S.P.Y. Agro

S.P.Y. Agro Industries Limited

Annexure-R/5

15

CIN No.: U01100TG2005PLC045887

Date: 15.06.2020

To
Environmental Engineer,
APPCB,
Regional Office,
Kurnool.

Ref: Notice No:KNL/205/PCB/RO/KRNL/Notice-2020-B2, Dated : 12.06.2020.

Sub: Replying your notice- Reg.

Respected sir,

Your PCB team inspected our Agro premises and gave few suggestions to resolve the bad odour issue in Nandyal, which was occurred due to non drying of wet cake. To rectify we took measures as follow

1) Firstly we sent enquiries to respective companies regarding of purchase of scrubbers; we also received quotation from a company (quotation will be enclosed)

And also purchase orders will be raised within 5 days. But to manufacture, fabricate and erection may take 6weeks

If any Technical or by inadequate labor issues raise, our complete production dept will be shut down and will solve that problem immediately.

We sent enquires to be low parties for scrubbers

- 1 SMD Engineering, Chennai
- 2 Techmax, Hyderabad
- 3 S R Enviro
- 4 Mathrushi engineering

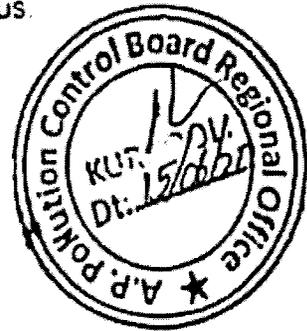
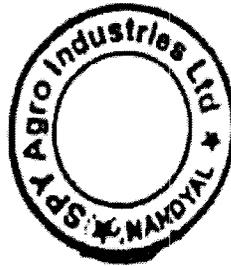
2) We also started works in enlarging of drainage flows, also dyke walls will be constructed around by which spillages due to heavy rains will be closed. This will be completed within 10 days

We also make sure that never such bad odour will release in future by us.

Thanking You Sir.

For S.P.Y Agro Industries Limited.,

Authorized Signatory.

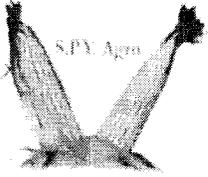


Regd. Office : D.No. 8-3-833, Plot No. 188, 1st Floor, Phase - II, Kamalapur Colony, Hyderabad - 500 073. T.S. INDIA
E-mail: spyagroindustries@gmail.com

Works : New Industrial Estate, Sy. No. 446 to 449, APIIC, Udumalpur, Nandyal, Kurnool Dt-518 502. A.P. INDIA
Phone: +91 8514 222084, Fax: 08514-222082, E-mail: spyagro_nandigroup@yahoo.com

|| T.C. ||

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Annexure - R-6

16

S.P.Y. Agro Industries Limited

CIN No.: U01100TG2005PLC045887

Date: 30.06.2020

To
The Environmental Engineer,
APPCB,
Kurnool.

Respected Sir,

Sub: Request for not to issue prohibition order - Reg

We would like to inform you that M/S Nandyala Gases Private Limited is part of our unit to M/s SPY Agro Industries Limited. Unfortunately accident met in CO₂ plant M/S Nandyala Gases Private Limited and factories Department issued prohibition Orders to CO₂ (Nandyala Gases Private Limited) Plant.

Hence, we request you to PLEASE ISSUE prohibition order only to CO₂ M/S Nandyala Gases Private Limited, Plant even if it is merged with SPY Agro Industries Limited.

Further, we request your good selves please permit /allow us to run the Distillery M/s S.P.Y Agro Industries Limited as 600 to 800 employees / workers are working.

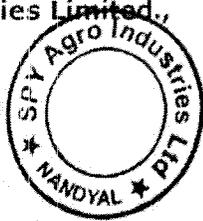
Hence, we request your good selves please do not issue any prohibition order to our units and we will comply all the compliance within 15 to 20 days.

Enclosed Compliance report for your Notice No: KNL-205/PCB/RO/KRNL/Notice-2020-82 Dt: 12.06.2020 and **Notice No.KNL-205/PCB/RO/KRNL/Notice-2020 dt 27.06.20**

Thanking you sir

Yours Sincerely
For S.P.Y Agro Industries Limited.

S. Sreedhar Reddy
Director



Regd. Office : D.No. 8-3-833, Plot No. 188, 1st Floor, Phase - II, Kamalapuri Colony, Hyderabad - 500 073. T.S. INDIA
E-mail: spyagroindustries@gmail.com

Works : New Industrial Estate, Sy. No. 446 to 449, APIIC, Udumalpur, Nandyal, Kurnool Dt.-518 502. A.P. INDIA
Phone: +91 8514 222084, Fax: 08514-222082, E-mail: spyagro_nandigroup@yahoo.com

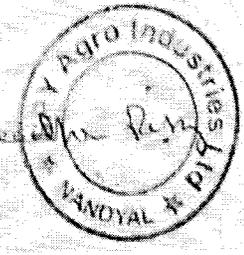
M/s.SPY AGRO INDUSTRIES LIMITED

Date: 30.06.20

17

COMPLIANCE REPORT FOR Notice No.KNL-205/PCB/RO/KRNL/Notice-2020, DTD, 27.06.20

S.No.	DIRECTIONS	COMPLIANCE
1	WHEREAS, an accident was occurred in M/s S.P.Y. Agro Industries Ltd., APIC, New Industrial Estate, Dhimulapuram (V), Namylal (M) Kurnool District at around 9:30 AM to 10:45 AM on 27.06.2020 and ammonia gas was leaked due to the pressure buildup in the Ammonia piping and pipe line got bursted and one person was deceased on the spot and three became ill when ammonia gas leaked.	We have paid Rs 50.00 lakhs Compensation to MR. K Srinivasa Rao
2	WHEREAS, the Board officials had carried out continuous monitoring of the Ambient Air Quality around the industry and as per the results of the today's monitoring, the ammonia levels recorded high at four places i.e., i) Near Security gate of bottling unit at a distance of 300 mtrs, ii) Near accident spot (10 mtrs), iii) SPY worker housing colony (Under construction - No habitation (1.5 KM) North direction, iv) Near Katasani Rami Reddy Lay out (2 Kms) North direction.	Due to wind direction ammonia gas level recorded but we have dissolved through water and cleared all the surround areas and we have taken all measures to clear the Ammonia Gas
3	WHEREAS, the team of officials consists of GM DIC, Kurnool, Deputy Chief Inspector of Factories, Kurnool & EE, APPCB, RO, Kurnool inspected your industry on 08.05.2020 and based upon the violations observed, the Deputy Chief inspector of Factories had issued a notice on 13.05.2020 for non compliance of Factories Act 1948 and A.P Factories Rules 1950	We have given reply of inspector of Factories dt 22.06.20 to comply all the condition and we will comply all the violations within 15 to 20 days

S. Srinivasa Rao


4	<p>WHEREAS, the Board has received complaint from Assistant Editor (Political affairs), The Times of India, Amaravathi through Whatsapp on 10.06.2020 regarding odour nuisance Page 1 of 2 from M/s S.P.Y. Agro Industries Ltd., Nandyal, Kurnool District stating that odour nuisance from the distillery is causing health problems to the residents of the Nandyal town such as vomiting, head ache, nausea due to high level of smell & air pollution and requested to take necessary action for controlling the odour nuisance.</p>	<p>We have given Purchase Order and paid 50% advance to the supplier. we are temporarily Fabricating and Erection of scrubber local made which is under process and with in 3 or 4 days it will complete, already it is in trail run from Dt 08.07.20</p>
5	<p>WHEREAS, the Regional office, Kurnool has issued a show cause notice to the industry On 12.06.2020 with a direction to show cause as to why legal action shall not be initiated against your industry under section 33 (A), 44 of Water (Prevention and Control of Pollution) Act, 1974 and under section 31 (A), 37 of the Air (Prevention and Control of Pollution) Act, 1987 and Amendments thereof, for violation of CFO order conditions and thereby causing odour nuisance, clearly mentioning that failing which action will be initiated against the industry under above said acts.</p>	<p>We have given Purchase Order and paid 50% advance to the supplier. we are temporarily Fabricating and Erection of scrubber local made which is under process and with in 3 or 4 days it will complete, already it is in trail run from Dt 08.07.20</p>
6	<p>WHEREAS, from the above occurrences, it evident that your industry is not complying most of the CFO conditions, not complying the provisions of Factories Act 1948 and AT Factories Rules 1950, not installed driers of adequate capacity to cater the generation of wet cake, not provided adequate control equipment i.e., scrubbers to avoid outdoor nuisance to the surrounding areas and ammonia gas leakage was occurred due to negligence attitude of the management towards safety measures.</p>	<p>We will comply all the compliance of the CFO Conditions , and we are taking necessary steps to install driers of adequate capacity to cater the generation of wet cake, and provide adequate control equipment i.e., scrubbers to avoid outdoor nuisance to the surrounding areas Now we are please to take necessary steps /action towards safety measures with 15 to 30 days</p>
7	<p>WHEREAS, you have not carried out comprehensive safety audit and not taken any safety measures to meet the emergencies & not complied CFO conditions thereby causing lot of air pollution and occurrence of ammonia gas leakage due to negligence attitude of the management towards safety measures.</p>	<p>We will take all the measures to meet the safety equipment to wards leakage Of ammonia gas within stipulated time</p>

S. Sreedhar Reddy



SPY AGRO INDUSTRIES LIMITED

Date : 30.06.2020

19

COMPLIANCE REPORT FOR Notice No.KNL-205/PCB/RO/KRNL/Notice-2020-82, DTD. 12-06-2020

S.No.	DIRECTIONS	COMPLIANCE
01	As per the CFO order dated 03.03.2020, the industry has to store the ash in closed shed only and utilize total quantity of ash for manufacture of Bricks, the industry is storing huge quantities of coal ash adjacent to the boiler there by causing air pollution to the surroundings during wind blows.	We will build customised shed in 30 to 45 days
02	As per the consent order, the Rain water shall not be allowed to mix with either trade or domestic effluents and shall maintain storm water drains properly. Whereas, the industry is not maintain the storm water drains properly and allowing the rain water to mix with trade effluents, runoff water from coal ash area and domestic water, lot of stagnation of coloured water in the storm water drains, on the roads the ETP units thereby causing ground water pollution. Also, the effluent treatment plant is in very bad shape and in dilapidated condition.	We will construct dyke wall and brick lining to drainage is under process and completed in 15 days.
03	As per the Consent order, the industry was directed to provide dyke wall at the process and ETP area for collection of spillages. Whereas, the industry has not provided dyke walls at the process area and ETP area, the spillages were overflowed into drains and lot of stagnation observed on the roads and formed cess pools in several areas.	We will provide dyke wall at the process and ETP area for collection of spillages with in 15 to 20 days. We have started all necessary cleaning work at the premises.
04	At present, the industry is generating about 120 to 130 tons of wet cake per day whereas the industry is having a drier of capacity 50 tons/day only which is inadequate to dry the wet cake on daily basis. It is observed that the industry is utilizing the driers of capacity - 100 TPD existing in their sister concern unit i.e., M/s. Nandi Grain Derivatives (P) Ltd., which is not having valid consents of the board.	We have given Purchase Order and paid 50% advance to the supplier. we are temporarily Fabricating and Erection of scrubber local made which is under process and with in 3 or 4 days it will complete.
05	From the above, it is evident the industry is operating the driers without adequate scrubbing capacity thereby lot of emissions were dispersed into the surrounding areas i.e., Bommalasatram and Kranti nagar and caused lot of inconvenience to the residents of Nandyal Town and also causing health problems to the residents of the Nandyal town such as vomiting, head ache, nausea due to high level of smell & air pollution.	Enclosed Purchase Order for your information. With in 10 weeks new scrubber will be installed. Sales order confirmation enclosed.

S. Sreedhar


11 T.C.11



Annexure-R/7

S.P.Y. Agro Industries Limited 20

CIN No.: U01100TG2005PLC045887

Date: 13.07.2020

To
The Joint Chief Environmental Engineer,
APPCB, Zonal Office,
Kurnool

Respected Sir,

Sub: Request for grant of time to comply the condition of your letters- Reg

With reference to the above, we would like to Inform you that M/s Nandyala Gases Private Limited, Is part of our unit (Merged) to M/s S. P.Y Agro Industries Limited , unfortunately accident occurred on 27.06.2020.

Now we request your goodselves please grant us to 10 days time to complete all the compliance to boards letters dated 12/06/2020, 27/6/2020 and 29.06.2020 enclosed compliance report.

Regarding safety hazard audit and Onsite emergency plan are we have paid 50% of amount to M/s Varaanga Engineers Pvt. Ltd. and today one person came to M/s S. P.Y Agro Industries Limited to complete the audit. We will include the Co2 Plant in M/s S. P.Y Agro Industries Limited immediately and will apply for CFO to Co2 Plant to include in S.P.Y Agro Industries Limited.

And offsite emergency plan we are in the process for preparation offsite emergency plan in consultation with District Administration.

Further, we request your good selves please permit /allow us to run the Distillery M/s S. P.Y Agro Industries Limited, as 600 to 800 employees / workers are working

Thanking you Sir,
Yours Sincerely,
For S. P.Y Agro Industries Limited

S. Sreedhar Reddy
Managing Director

Copy to: The Environmental Engineer, Regional office, APPCB, Kurnool



Regd. Office : D.No. 8-3-833, Plot No. 138, 1st Floor, Phase - II, Kamalapur Colony, Hyderabad - 500 073. T
E-mail: spyagroindustries@gmail.com

Works : New Industrial Estate, Sy. No. 446 to 449, APIIC, Udumalpur, Nandyal, Kurnool Dt.-518 502. A.P. INDIA
Phone: +91 8514 222084, Fax: 08514-222082, E-mail: spyagro_nandigroup@yahoo.com

117.e.11

Annexure-R/8

M/s S. P.Y Agro Industries Limited ²¹

Date: 17.07.2020

To
The Chairman
APPCB
VIJAYWADA

Sub: Request for operate power generation plant for Lighting for maintenance work
Purpose - Reg

Ref: Order No.52/APPCB/UH-II/TF/KNI/2020 dt 13.7.2020

With reference to the above, above stop production orders we have voluntary release stopped production 5 days back and inform Regional office Kurnool Orally due to COVID -19 in Nandyal office staff no body attending duty.

Now we humbly request you to please kindly give permission to operate power generation plant for Lighting for Maintenance Work purpose , without power we can't complete the maintenance work.

Hence, we request you to give permission to above industry.

Thanking You Sir

Yours Sincerely

For S.P.Y Agro Industries Limited


Authorized Signatory

Copy to: The Joint Chief Environmental Engineer, APPCB, Kurnool

The Zonal office, APPCB, Kurnool

The Regional office , APPCB, Kurnool


" T.C. "



S.P.Y. Agro

Annexure-R/9

S.P.Y. Agro Industries Limited 22

CIN No.: U01100TG2005PLC045887

Date : 18.07.2020

The Chairman,
APPCB,
Vijayawada.

Sir.

Sub: Compliance note - Reg

Ref: Your Order No. 52/APPCB/UH-II/TF/KNL/2020 Dated : 13.07.2020.

With reference to the above cited, yesterday we received the above said letter and was served by an official from APPCB, Kurnool.

- We already installed scrubber and it is functioning.
- Order placed for one more horizontal wet scrubbing system and will be delivered shortly (Sales order confirmation enclosed).
- Mechanical problems of the drying system rectified and effectively running.
- A customized shed is planned to store ash/husk and it will be constructed in a month time
- 800 tons of ash collections/deposits disposed/cleared.
- All drains and rain water lines are well cleaned and cleared.
- A dyke wall is being constructed at required areas.
- Leakages/spillages are arrested/repared where required.
- Pictures are enclosed for your perusal.

Thanking you sir.

Yours Faithfully,

For S.P.Y Agro Industries Limited.,

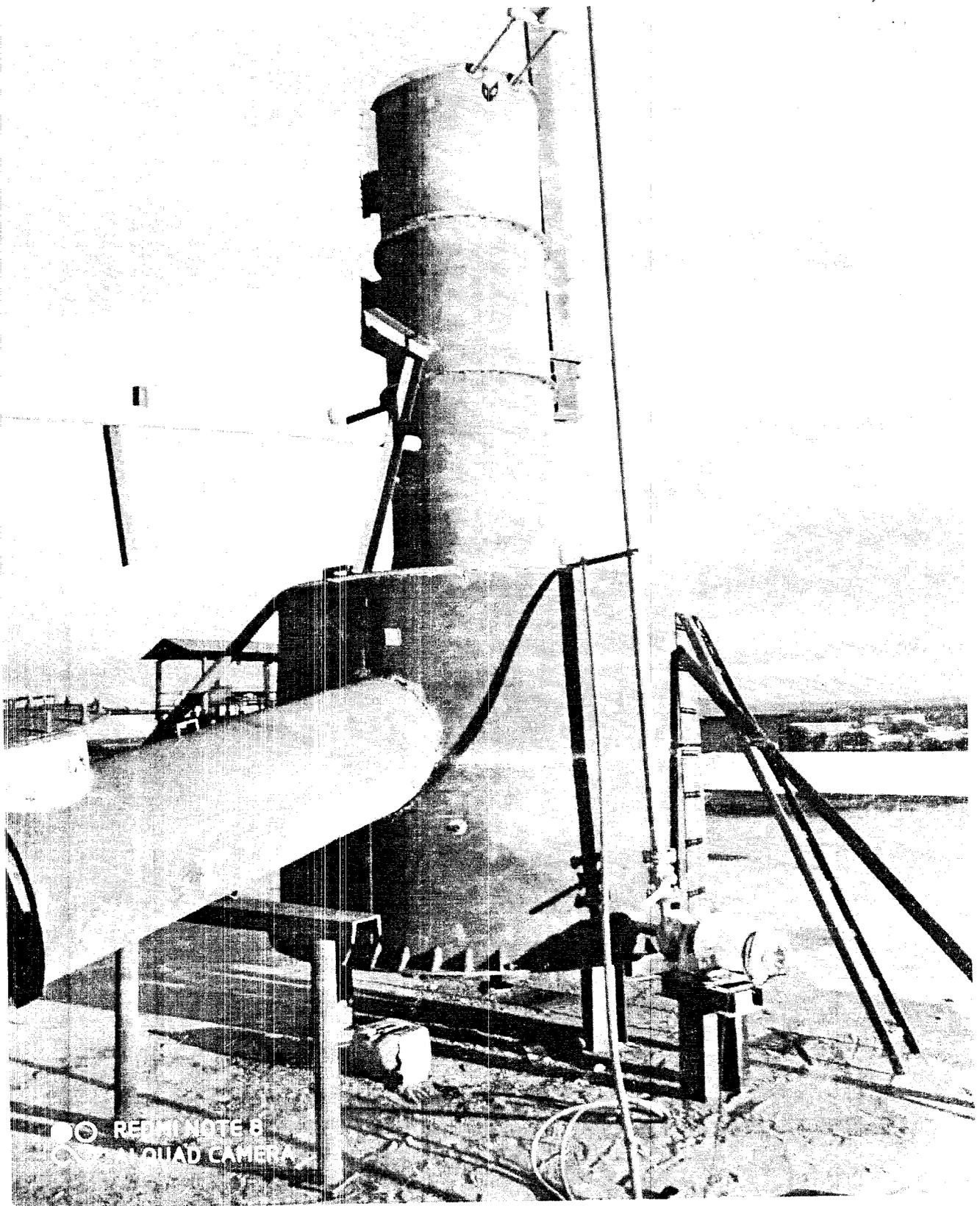
Authorized Signatory.



Regd. Office : D.No. 8-3-833, Plot No. 188, 1st Floor, Phase - II, Kamalapur Colony, Hyderabad - 500 073. T.S. INDIA
E-mail: spyagroindustries@gmail.com

Works : New Industrial Estate, Sv. No. 446 to 449, APIIC, Udumalpur, Nandyal, Kurnool Dt.-518 502. A.P. INDIA
Phone: +91 8514 222084, Fax: 08514-222082, E-mail: spyagro_nandigroup@yahoo.com

Scrubber





Annexure - R/10

S.P.Y. Agro Industries Limited 25

CIN No.: U01100TG2005PLC045887

Date : 10.08.2020

The Chairman,
APPCB,
Vijayawada.

Sir,

Sub: Compliance note - Reg

Ref: Your Order No. 52/APPCB/UH-II/TF/KNL/2020 Dated : 13.07.2020.

With reference to the above cited, we have received the above said letter on 17.07.2020 and was served by an official from APPCB, Kurnool.

- We already installed scrubber and it is functioning.
- Order placed for one more horizontal wet scrubbing system and will be delivered shortly (Sales order confirmation enclosed)
- Mechanical problems of the drying system rectified and effectively running.
- A customized shed is planned, and it is under construction.
- All drains and rain water lines are well cleaned and cleared.
- Dyke walls constructed at required areas and covered by stone slabs.
- Leakages/spillages are strictly arrested.
- Pictures are enclosed for your perusal.

Thanking you sir.

Yours Faithfully,

For S.P.Y Agro Industries Limited.,


Authorized Signatory.



Head Office : D.No. 8-3-833, Plot No. 188, 1st Floor, Phase - II, Kamalapur Colony, Hyderabad - 500 073. T.S. INDIA
E-mail: spyagroindustries@gmail.com
Works : New Industrial Estate, Sy. No. 446 to 449, APIIC, Udumalpur, Nandyal, Kurnool Dt.-518 502. A.P. INDIA
Phone: +91 8514 222084, Fax: 08514-222082, E-mail: spyagro_nandigroup@yahoo.com

SALES ORDER CONFIRMATION



M/s.Essar Enviro Air Systems
 S.Y.No:198/U, GAGILLAPUR
 Quthbullapur (M).R.R.Dist.T.S.
 GSTIN/UIN: 36CJXPS2718B1ZV
 State Name : Telangana Code : 36
 E-Mail : essareng777@gmail.com

Invoice No
013
 Delivery Note
 Supplier's Ref.

Dated
6-Jul-2020
 Mode/Terms of Payment
50% AAdvance 50% Against PI
 Other Reference(s)

26

Buyer

S.P.Y AGRO INDUSTRIES LIMITED
 NEW Industrial Estate . Sy.No /; 446 to 449. APIIC.
 Udumalpur, Nandyal, Kurnool Dt5*8 502
 GSTIN/UIN : 37AAJCS0911J1ZB
 PAN/IT No
 State Name : Andhra Pradesh. Code : 37

013
 Buyer's Order No.
SPYAIL/20-21/PO/NGDPL/104
 Despatch Document No.

Dated
29-Jun-2020
 Delivery Note Date

Despatched through

Destination

ROAD
 Terms of Delivery
20-SEP-2020

SI No.	Description of Goods	HSN/SAC	Quantity	Rate	per	Amount
1	INDUSTRIAL SCRUBBER Horizontal Wet Scrubbing System Freight : SPY Scope Commissioning Extra	84219900	1.000 nos	11,50,650.00	nos	11,50,650.00

OUT PUT IGST@18 % 18 % 2,07,117.00

Total 1.000 nos **₹ 13,57,767.00**
E. & O E

Amount Chargeable (in words)

INR Thirteen Lakh Fifty Seven Thousand Seven Hundred Sixty Seven Only

HSN/SAC	Taxable Value	Integrated Tax Rate	Integrated Tax Amount	Total Tax Amount
84219900	11,50,650.00	18%	2,07,117.00	2,07,117.00
Total	11,50,650.00		2,07,117.00	2,07,117.00

Tax Amount (in words) **INR Two Lakh Seven Thousand One Hundred Seventeen Only**

Company's PAN **CJXPS2718B**

Declaration

We declare that this invoice shows the actual price of the goods described and that all particulars are true and correct

1. Goods once sold will not be taken back or exchange.
2. Interest @24% will be charged if bill is not settled on due date.
3. All disputes are subject to Secunderabad jurisdiction only.

Customer's Seal and Signature

Company's Bank Details

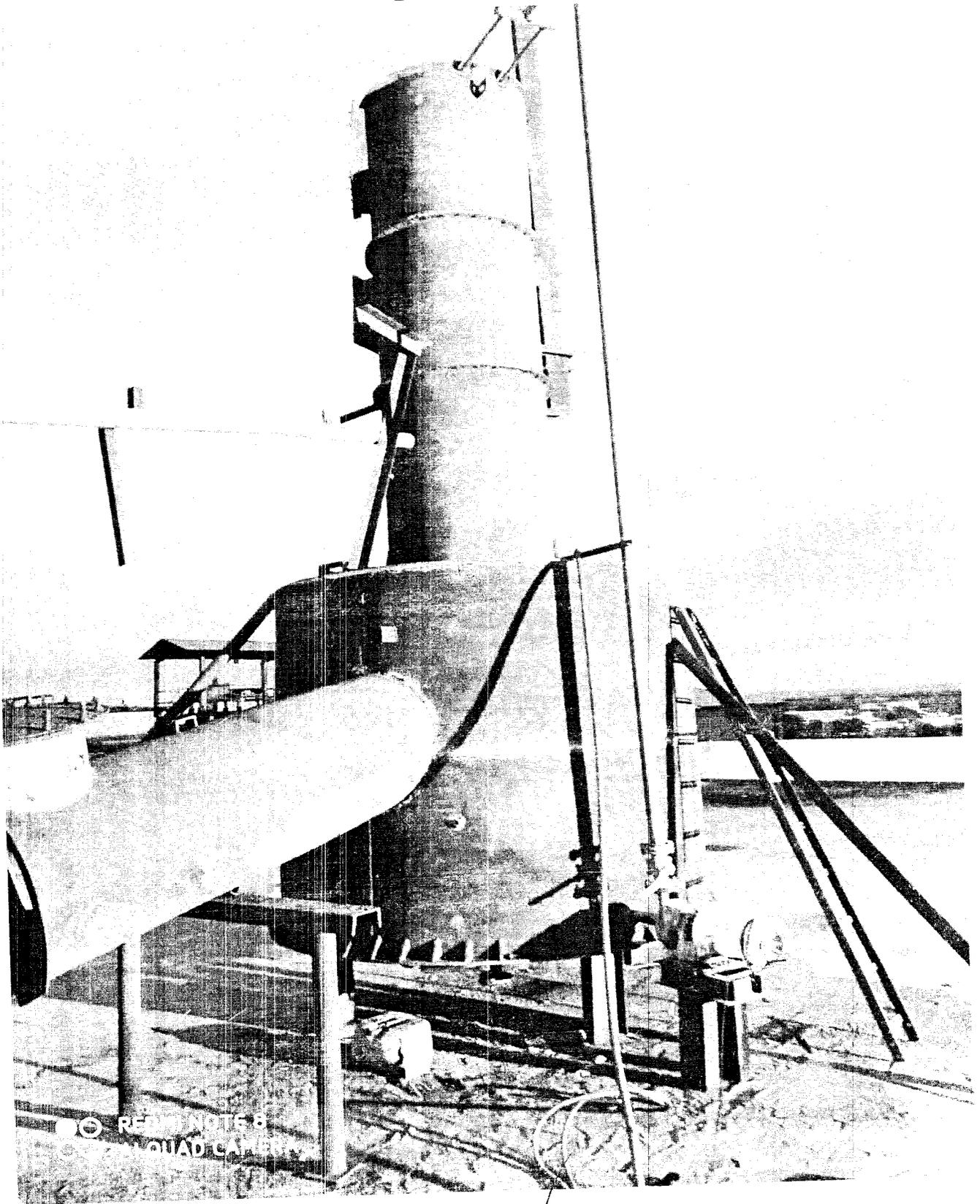
Bank Name : **Lakshmi Vilas Bank-00571**
 A/c No : **0391360000000571**
 Branch & IFS Code : **Kompally & LAVB0000391**
 for M/s.Essar Enviro Air Systems

Authorised Signatory

SUBJECT TO SECUNDERABAD JURISDICTION

This is a Computer Generated Invoice

Scrubber



in
" T. C. "

Annexure-R/11

28

Date : 07.09.2020

File No. 001100TG2005PLC045687

The Chairman,
APPCB,
Vijayawada.

Sir,

Sub. Request for revocation of our plant - Reg

Ref: Your Order No. 52/APPCB/UH-II/TF/KN1/2020 Dated : 13.07.2020.

With reference to the above cited, we have received the above said letter on 17.07.2020 and was served by an official from APPCB, Kurnool

- We already installed scrubber and it is functioning
- Order placed for one more horizontal wet scrubbing system and will be delivered shortly (Sales order confirmation enclosed).
- Mechanical problems of the drying system rectified and effectively running.
- A customized shed is planned and it is under construction.
- All drains and rain water lines are well cleaned and cleared.
- Dyke walls constructed at required areas and covered by stone slabs.
- Leakages/spillages are strictly avoided
- Pictures are enclosed for your perusal

Hence we humbly request you please kindly consider our request to issue revocation orders as we have already completed 90% to 95% of works complied

Thanking you sir

Yours Faithfully,

For S.P.Y Agro Industries Limited.,


Authorized Signatory.

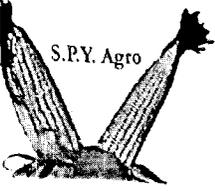
Copy to the Joint Chief Environment Officer, Zonal Office, APPCB, Kurnool.


" T.C. "

Regd. Office : D.No. 43803 Andhra Pradesh, State Capital, Hyderabad - 500004
E-mail: appcb@nic.gov.in

Works : No. 1, Industrial Area - B, Surubettu - 4, Kurnool District, Andhra Pradesh - 517001
E-mail: spya@nic.gov.in

Annexure-R/12



S.P.Y. Agro Industries Limited 29

CIN No.: U01100TG2005PLC045887

Date: 06/10/2020

To,

The Member Secretary
AP Pollution Control Board
VIJAYAWADA

Respected Sir

Sub: Request for Revocation Order – Reg

Ref: 1) Your Order No.52/APPCB/UH-II/TF/KNL/2020, Dated: 13.07.2020
2) Our letter dated 07.09.2020

We would like to inform you that, we have complied all the conditions and enclosed the detailed information for the following

- 1) Revocation order from factories Department (Deputy Chief inspector of Factories) Dated 5/10/2020
- 2) Pre Startup Safety Review Report
- 3) Building Stability Testing Report
- 4) Application for process of clearance fire department
- 5) Safety audit report
- 6) Onsite Emergency plan

Thanking you Sir,

Yours Sincerely,

For S. P. Y Agro Industries Limited

S. Sreedhar Reddy
Managing Director.

Copy to: The Environmental Engineer, AP Pollution Control Board, Regional Office, Kurnool.

Regd. Office : D.No. 8-3-833, Plot No. 188, 1st Floor, Phase - II, Kamalapur Colony, Hyderabad - 500 073. T.S. INDIA
E-mail: spyagroindustries@gmail.com

Works : New Industrial Estate, Sy. No. 446 to 449, APIIC, Udumalpur, Nandyal, Kurnool Dt.-518 502. A.P. INDIA
Phone: +91 8514 222084, Fax: 08514-222082, E-mail: spyagro_nandigroup@yahoo.com

11 T.C. 11



B.Y.Muni Prasad
Environmental Engineer

ANDHRA PRADESH POLLUTION CONTROL BOARD
REGIONAL OFFICE: KURNOOL

1st Floor, Shankar Shopping Complex, Krishna Nagar Main Road, Kurnool - 518 002

Tele : 08518 235800
email : roknl-cc1@appcb.gov.in

Annexure-R/13

30

Lr.No.205/APPCB/RO/KNL/SPY/2020 -

Date:05.10.2020

Sub: APPCB - RO - KNL - M/s S.P.Y. Agro Industries Limited, APIIC, New Industrial Estate, Udumulapuram (V), Nandyal (M), Kurnool District - Submitted representation for revocation of Stop production orders - Directions issued for all accident cases applying for revocation - Information called for - Regarding.

- Ref:
1. Hon'ble NGT, Principal Bench, New Delhi, dated: 06.07.2020 in O.A.No.107 of 2020.
 2. Stop production Order No.CTR-405/APPCB/ZO-KNL/2020-179, Dated.21.08.2020.
 3. Email dt:04.09.2020 received from UH-II, JCEE, Board Office, Vijayawada.
 4. Email dt:16.09.2020 received from UH-II, JCEE, Board Office, Vijayawada to furnish the status report on revocation of Stop productions orders.
 5. Instructions of Member Secretary Email dt:27.09.2020 received from UH-II, AEE, Board Office, Vijayawada to furnish the status report on revocation of Stop productions orders & APPCB for obtaining the opinion of the Collector & District Magistrate, Kurnool

It is humbly submitted that, in the orders of the Hon'ble National Green Tribunal (NGT), dated: 06.07.2020 in O.A.No.107 of 2020 with regard to the Ammonia gas leakage occurred at M/s S.P.Y. Agro Industries Limited, Nandyal (M), Kurnool District on 27/06/2020, the following direction is there at para No.6(v):

"In view of the stand of the State PCB and the Company that it will not recommence its operation without requisite statutory clearances, we direct that if any such statutory clearances are granted and the Company proposed to recommence, this aspect must be brought to the notice of this Tribunal so that compliance of law is ensured".

Vide reference 2nd cited above, the A.P Pollution Control Board vide order dated:13.07.2020 issued stop production orders to M/s. S.P.Y. Agro Industries Ltd under section 33 (A) of Water (Prevention & Control of Pollution) Act, 1988 and under Section 31 (A) of Air (Prevention & Control of Pollution) Act, 1987 for non compliance Board directions, Consent Conditions and also for causing the accident in the industry on 27.06.2020.

Once again Second accident was occurred on 05.08.2020 in M/s S.P.Y. Agro Industries Limited APIIC, New Industrial Estate, Udumulapuram (V), Nandyal (M), Kurnool District at around 10.00 PM. One employee of M/s S.P.Y. Agro Industries Ltd., viz., Sri P.Lakshmana Murthi, Sr. Fitter, 62 years was exposed to steam and died at about 6:00 AM on 06.08.2020 due to severe burns.

Vide refence 3rd cited above, the Board Office, Vijayawada communicated the directions of the Member Secretary to obtain the following in all the accidents cases applying for revocation:

1. Obtain recommendation from the District Collector
2. Inspection report of the joint inspection committee
3. Undertaking from the owner and occupier of the company that there would be no accidents in future
4. Safety audit report duly certified by Factory inspector.

The committee constituted by Hon'ble NGT visited M/s S.P.Y. Agro Industries Ltd on 21.09.2020 & 22.09.2020.

31

The following are, some of the observations made by the committee constituted by Hon'ble NGT during their visit:

- The industry is mixing the lime manually to the collection cum neutralization tank and there are no agitators for proper mixing. They should provide dosing tank to neutralize the effluents instead of dumping the lime manually.
- House keeping was very poor (photos are attached)
- Cess pools are formed due to stagnation of rain water
- As per the log book available with MEE operator, it is observed that the industry operated the MEE in the month of August, 2020 though stop production order was issued by the APPCB on 13/07/2020.

As per the records, the industry was operated the plant 3 times after ammonia gas leakage accident occurred on 27.06.2020 and after issue of stop production order by APPCB on 13.07.2020

Vide reference 5th cited above, the AEE, UH-II, Board office, Vijayawada forwarded a mail to Regional office, Kurnool stating that he has been directed by Member Secretary to obtain the report on M/s SPY Agro products, Kurnool for revocation. i) the safety audit report by the industry may be submitted, ii) District collector Kurnool opinion may be obtained iii) If the Joint committee (by industriesdept) report is complete, the same may also be submitted iv) Copy of the Factories department revocation order may also be submitted.

Further it is submitted that, the industry has submitted safety audit report, without any certification from Factories Department, not received undertaking from the owner and occupier of the company that there would be no accidents in future and also not received the Inspection report of the Joint Inspection Committee constituted vide G.O.Rt.No.156, dt: 04/08/2020 issued by Industries and Commerce (P & I) Department, Govt. of Andhra Pradesh

Finally it is humbly submitted that the request of industry for revocation of stop production order will be processed only after receipt of the all the above documents required as per the Board office mails dated.04.09.2020 & 27.09.2020.

BY MUNI PRASAD Digitally signed by B Y MUNI PRASAD
Date: 2020.10.05 22:46:56 +05'30'

ENVIRONMENTAL ENGINEER

To,
M/s S.P.Y. Agro Industries Limited,
APIIC, New Industrial Estate,
Udumulapuram (V), Nandyal (M),
Kurnool District

Handwritten signature

|| T.C. ||



S.P.Y. Agro

dt:
Annexure-R/14
S.P.Y. Agro Industries Limited 32

CIN No.: U01100TG2005PLC045887

Date: 12.10.2020

To

The Environmental Engineer
APPCB- Regional office
KURNOOL

Dear Sir,

Sub: Request for revocation for Stop Production order -Reg
Ref: Lr No, 205/APPCB/REG/KNL/SPY/2020- dt 05/10/2020

With reference to the above we herewith submit that the following for the
revocation for stop production orders

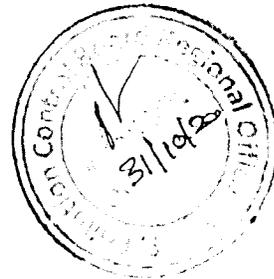
- 1) Under taking that there would be no accidents in future
- 2) Safety audit reports (acknowledge for your kind information)

Hence, we humbly request your good selves please issue revocation
orders of stop production orders.

Thanking you Sir

Yours Faithfully,
For S. P. Y Agro Industries Limited

Signature
Director



Regd. Office : D.No. 8-3-833, Plot No. 188, 1st Floor, Phase - II, Kamalapur Colony, Hyderabad - 500 073. T.S. INDIA
E-mail: spyagroindustries@gmail.com

Works : New Industrial Estate, Sy. No. 446 to 449, APIIC, Udumalpur, Nandyal, Kurnool Dt.-518 502. A.P. INDIA
Phone: +91 8514 222084, Fax: 08514-222082, E-mail: spyagro_nandigroup@yahoo.com

Signature
|| T. C. ||

CIN No.: U01100TG2005PLC045887

16.10.2020
The Deputy Chief Inspector of Factories,
Kurnool.

Respected Sir,

Sub: Compliance Letter- Reg

Ref: Your Lr.No.B/329/2020, Dated : 05.10.2020

With reference to your letter cited above, We here with submitting a detailed point wise conditions and compliances as follows.

S.No	CONDITIONS	COMPLIANCE
1	The clearance from A.P. Disaster Response and fire services department shall be obtained before commencement of operations in the factory.	Acknowledgement for final occupancy certificate enclosed.
2	The recommendations of safety audit shall be complied with and the compliance shall be submitted to the Deputy Chief Inspector of Factories, Kurnool under copy to the Director of Factories, A.P., Vijayawada within 15 days from the date of receipt of this order.	Safety audit, recommendations and compliances addressed list enclosed.
3	Occupational Health Center along with articles and equipments prescribed with supporting staff shall be provided within 30 days from the date of receipt of this order.	Under progress / furnishing.
4	The onsite emergency preparedness shall be subjected to testing immediately within 15 days and thereafter once in every 6 months with a full - scale mock drill involving all stake holders	Will be taken up and conducted on October 19 th 2020.
5	All operations in manufacturing process shall be supervised by the experienced and qualified persons in all shifts.	Enclosed.
6	Draw and follow preventive maintenance schedule of all equipment.	Enclosed.
7	Follow work permit system for different works in the factory.	Enclosed.
8	All the safety precautions shall be followed as per the recommendations stated in the Inspection order and so pointed out from time to time	Strictly Following.

Thanking you sir.

Yours faithfully,

For SPY Agro Industries limited,

for K. Babu
Managing Director

Copy to Director of Factories, A.P, Vijayawada,
Commissioner of Proh. & Excise, A.P, Vijayawada.
Asst. Proh. & Excise Supt., M/s. S.P.Y Agro Industries Ltd., Nandyal.

11 T.C.11

Regd.Office : D.No. 8-3-833, Plot No. 188, 1st Floor, Phase - II, Kamalapur Colony, Hyderabad - 500 073. T.S. INDIA
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Phone: +91 8514 222084, Fax: 08514-222082, E-mail: spyagro_nandigroup@yahoo.com



S.P.Y. Agro Industries Limited

34

Dated: 19.11.2020

CIN No.: U01100TG2005PLC045887

To,
The Member Secretary,
Andhra Pradesh Pollution Control Board,
Vijaywada-520010

Reference: (1) Your Closure Order bearing no.52/APPCB/UH- II/TF/KNL/2016 dated 29.10.2020
(2) Your Stop Production Order bearing no. 52/APPCB/UH-II/TF/KNL/2020 dated 13.07.2020

Subject: Request for revocation of Closure Order dated 29.10.2020 and Stop Production Order dated 13.07.2020-Undertaking of compliance-reg.

Respected Sir,

This is with reference to the above referred Closure Order dated 29.10.2020 and Stop Production Order dated 13.07.2020 issued by your good self against the undersigned company.

The aforesaid orders were issued on account of the unfortunate event of accident occurred in the undersigned company due to ammonia gas leakage which was neither deliberate nor intentional.

That for your kind appraisal and consideration, we would like to submit herein that the undersigned company has taken all necessary preventive and safety measures to avoid any such accident in future.

Therefore, the undersigned company vide this letter undertakes to comply with the Orders passed by NGT in future and further undertakes to adhere to the guidelines, notifications and circulars issued by your good offices from time to time in near future.

We would further like to submit herein that due to Covid-19 situation and aforesaid closure and stop production orders, the company is running under huge losses which in turn is affecting the livelihood of employees/workers of the company.

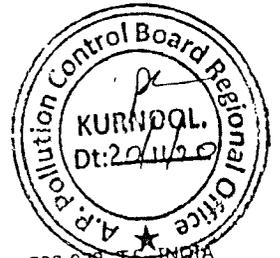
Further taking into consideration the aforesaid facts, your good self is humbly requested to kindly revoke the aforesaid Orders on urgent basis to avoid irreparable loss to the company which cannot be calculated in monetary terms.

We shall be deeply obliged for this act of kindness and will look forward to hearing from you soon.

Thanks and regards,

For, M/s S.P.Y. Agro Industries Limited.

[Signature]
Director.



Copy to: The Environmental Engineer, APPCB, Regional office, Kurnool

Regd. Office : D.No. 8-3-833, Plot No. 188, 1st Floor, Phase - II, Kamalapuri Colony, Hyderabad - 500 075, INDIA
E-mail: spyagroindustries@gmail.com

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S.P.Y. Agro

S.P.Y. Agro Industries Limited

35

CIN No.: U01100TG2005PLC045887

To
The Member Secretary
APPCB
VIJAYAWADA

Letter of Undertaking

We, M/s S. P. Y Agro Industries Limited, have already initiated all safety measures and precautions applicable for running the industry. And We here by undertake that we will obey the order of Honorable National Green Tribunal No 107 dated 28.06.2020 we have given compensation to the deceased persons.

We under take to pay Environmental compensation as recommendation by the Honorable National Green Tribunal.

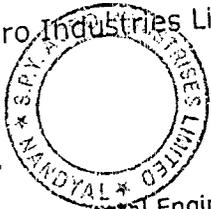
Hence, we request your good selves please issue revocation orders to the above industry.

dal

Thanking you sir

For S.P. Y Agro Industries Limited,

Lijala
Director



Copy to: The Environmental Engineer, APPCB, Kurnool

Regd. Office : D.No. 8-3-833, Plot No. 188, 1st Floor, Phase - II, Kamalapuri Colony, Hyderabad - 500 073. T.S. INDIA
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11 T.C.11



Order No. 52 /APPCB/UH-II/TF/KNL/2016-

Date: 29.10.2020.

CLOSURE ORDER

Sub: APPCB – UH-II – TF - M/s S.P.Y. Agro Industries Ltd., APIIC, New Industrial Estate, Udumulapuram (V), Nandyal (M), Kurnool District – An accident occurred in M/s S.P.Y. Agro Industries Ltd., on 27.06.2020 at around 9.30 AM – Closure order issued - Reg.

- Ref:**
1. E.C. expansion order dt.14.02.2015 issued by MoEF & CC, Gol.
 2. Consent Order No.APPCB/KNL/17872/HO/2015-2105, Dt.13.03.2015.
 3. Order No. 52/APPCB/UH-II/TF/KNL/2016, dt.26.04.2016.
 4. The auto renewal dated. 26.04.2018 has extended for period of one year Seven Months i.e., up to 31.10.2019.
 5. Consent Order No. APPCB/KNL/17872/HO/2015-2105, dt.03.03.2020 valid upto 31.10.2021.
 6. An accident occurred in the industry on 27.06.2020 at around 9.30 AM.
 7. Stop Production No:CTR-405/APPCB/ZO-KNL/2020-179, dt 13.07.2020.
 8. SC Notice issued to the industry dt 19.10.2020.
 9. RO report dt 26.10.2020.

WHEREAS you are operating a Grain based distillery unit in the name & style of M/s S.P.Y. Agro Industries Ltd., is located at APIIC, New Industrial Estate, Udumulapuram (V), Nandyal (M), Kurnool District and engaged in manufacturing of Total spirit- 134 KLD (or) Extra Neutral Alcohol (ENA) – 125 KLD and operating the co-generation power plant of capacity – 6.5 MW.

WHEREAS vide reference 1st cited, the industry has obtained Environmental Clearance from MoEF, Govt of India vide order No. F.No. J-11011/159/2007-IA II (I) dated 28.06.2007 for 134 KLPD Grain based Distillery unit RS/ENA/Ethanol & 04 MW Co-Generation power plant. Subsequently, the industry has obtained Environmental Clearance from MoEF, Govt of India for expansion of Grain based Distillery from 134 KLPD to 500 KLPD vide order No. F.No. J-11011/339/2011-IA II (I) dated 14.02.2015. The activities permitted in the EC order are: 1) Expansion of Grain based Distillery from 134 KLPD to 500 KLPD by installing 366 KLPD Grain based Distillery plant with 12.5 % V/V Alcohol Content. 2) Modernization of existing 134 KLPD Grain based Distillery Plant through process improvements to achieve 12.5 % V/V alcohol content. 3) change of ETP technology 4) installation of 16.5 of Co-Generation plant with 3X50 TPH AFBC boilers.

WHEREAS vide reference 2nd cited, the industry was issued with CFO & HWA of the Board vide order dated. 13.03.2015 with a validity up to 31.03.2017 manufacturing Total spirit- 134 KLD (or) Extra Neutral Alcohol (ENA) – 125 KLD. Subsequently, the industry was also issued CFO & HWA of the Board vide order dated.01.10.2016 for with validity upto 31.03.2017 for co-generation power plant – 6.5 MW.

WHEREAS vide reference 3rd cited, the Board issued directions to the industry on 26.04.2016 for non-compliance of the Board directions and CFO conditions.

WHEREAS vide reference 4th cited, the Board vide auto renewal dated. 26.04.2018 has extended the validity of CFO & HWA orders dated.13.03.2015 & 01.10.2016 for further period of one year Seven Months i.e., up to 31.10.2019.

WHEREAS vide reference 5th cited, the industry has obtained the CFO vide order dt 03.03.2020 valid upto 31.10.2021 manufacturing Total spirit- 134 KLD (or) Extra Neutral Alcohol (ENA) – 125 KLD and co-generation power plant – 6.5 MW.

WHEREAS vide reference 6th cited, an accident occurred in M/s S.P.Y. Agro Industries Ltd., on 27.06.2020 at around 9.30 AM viz., ammonia gas leakage due to built up of the pressure in the Ammonia piping and pipe line got bursted and one person was deceased on the spot and three became ill when ammonia gas leaked.

WHEREAS vide reference 7th cited, the Board issued Stop production order to the industry dt 13.07.2020.

37

WHEREAS the committee constituted by Hon'ble NGT visited M/s S.P.Y. Agro Industries Ltd on 21-09.2020 & 22.09.2020 and observed that the industry operated the plant 4 times even after issue of stop production order by APPCB on 13.07.2020 i.e. from 19/07/2020 to 22/07/2020, from 29/07/2020 to 31/07/2020, from 1/08/2020 to 04/08/2020 and from 10/09/2020 to 18/09/2020 and under continuous operation from 07.10.2020 without obtaining revocation of Stop production order.

WHEREAS vide reference 8th cited, the RO issued show cause notice to the industry dt 19.10.2020 for operating the unit without revocation of stop production order.

WHEREAS vide reference 9th cited, the RO submitted report requesting action against the industry as the industry violated the implementation of stop production order dt: 13.07.2020

After careful consideration of material facts of the case, the Board hereby issues **CLOSURE ORDER** for non-compliance of CFO conditions and Board directions under Sec.33 (A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under Sec.31(A) of Air (Prevention & Control of Pollution) Amendment Act, 1987.

M/s A.P.S.P.D.C.L., has been requested to disconnect the power supply to M/s S.P.Y. Agro Industries Ltd., APIIC, New Industrial Estate, Udumulpuram (V), Nandyal (M), Kurnool District.

You are further directed to take note that if you continue to operate your unit after receipt of this order, you will be liable for prosecution U/s. 41 of Water (Prevention & Control of Pollution) Act, 1974 and amendments thereof & U/s. 37(1) of Air (Prevention & Control of Pollution) Act, 1981 and amendments thereof, the punishment under this section will be imprisonment for a term which shall not be less than one year six months but which may extend to six years and with fine.

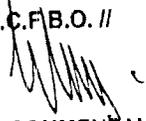
You are also directed to take note that the M/s.A.P.S.P.D.C.L., has been ordered to disconnect electricity supply to your unit with immediate effect. Should you resort to operate your unit by means of diesel generator or any mechanical device, you will be attracting prosecution U/s. 41 of Water (Prevention & Control of Pollution) Act, 1974 and amendments thereof & U/s. 37(1) of Air (Prevention & Control of Pollution) Act, 1981 and amendments thereof.

This Order comes into effect from today i.e., 29.10.2020.

Sd/-
CHAIRMAN

✓
To
M/s S.P.Y. Agro Industries Ltd.,
APIIC, New Industrial Estate,
Udumulpuram (V), Nandyal (M),
Kurnool District

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


JOINT CHIEF ENVIRONMENTAL ENGINEER
UH-II


// T.C. //



S.P.Y. Agro Industries Limited

Annexure-R/18

38

CIN No.: U01100TG2005PLC045887

Date: 29.10.2020

To,

The Joint Chief Environmental Engineer,
AP Pollution Control Board
Kurnool

Respected Sir,

Sub; Request for issue of Revocation Order -Reg

Ref :1) your order No. 52/ APPCB/UH-II/TF/KNL/2016 dt 29.10.20

2) Our letter dated 07.09.2020& email dated 07.09.2020

With reference to the above 1st cited, we have received closure order on 29/10/2020 . It is humbly submitted that we have already complied with all the CFO conditions and board directions .

We have already given detailed explanation with photos to the AP Pollution Control Board Vijayawada in the reference 2nd cited and Regional Office – Kurnool. Once again detailed explanation is furnished below for your kind information.

As per your closure orders vide reference to the 1st cited, the committee constituted by Hon'ble NGT visited M/ S. P.Y Agro Industries Limited , on 21/09/2020 & 22.09.2020 and observed that the industry operated the plant 4 times even after issue stop production orders by APPCB on 13.07.2020 i.e. form 19/07/2020 to 22/07/2020 from 29/07/2020 to 31/07/2020 from 01/08/2020 to 04/08/2020 and from 10/09/2020 to 18/09/2020 and under continuous operation from 07.10.2020 with out obtaining revocation of stop production orders. We submit the following few lines for your kind consideration and explanation for the operation of the industry .

Continue....

Regd.Office : D.No. 8-3-833, Plot No. 188, 1st Floor, Phase - II, Kamalapuri Colony, Hyderabad - 500 073. T.S. INDIA
E-mail: spyagroindustries@gmail.com

Works : New Industrial Estate, Sy. No. 446 to 449, APIIC, Udumalpur, Nandyal, Kurnool Dt.-518 502. A.P. INDIA
Phone: +91 8514 222084, Fax: 08514-222082, E-mail: spyagro_nandigroup@yahoo.com



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1. Fermented Wash:

Typical life of wash is 3-6days, after which Volatile Acid levels build up to 1000+ppm levels, and after that quickly becomes an environmental hazard.

The unit's fermenters were all full of wash, the finished product of fermentation with 13% alcohol. This amounts to tens of lacs of liters of liquid which if left untouched would putrefy and cause smell and other environmental issues.

In view of this, the company decided to process the material as disposal of the material in such a quantum is not environmentally or in any other way feasible.

2. Effluent Treatment :

Digester Biomethanation time is 10-15days, and will require to be constantly circulated or emptied to keep all biochemical parameters under control. Similarly STP needs to be in constant aeration to limit COD and BOD of the effluent.

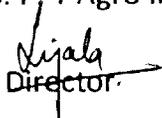
Hence , we humbly request you not to take any coercive steps/ action against the above industry and we undertake / promise that we will not violate pollution control board orders as we were forced to restart distillation as the in-process wash had started putrefying, with volatile acids building to 1000++ ppm, if not processed, this would have created a problem with disposal, again faced issue with in process liquids in the fermenter and biodigester culture in the interest of Public Health and Environment.

Further, we humbly request your goodoffices please issue revocation orders sympathetically to the industry as hundreds of employees and their families are depending on this unit.

Thanking you Sir,

Yours Faithfully,,

For S. P. Y Agro Industries Limited


Director.


" T. C. "



S.P.Y. Agro

S.P.Y. Agro Industries Limited

Annexure-R/19

(colly)

40

CIN No.: U01100TG2005PLC045887

To
The Environmental Engineer,
APPCB, Regional Office,
Kurnool

DT: 20.10.2020

Dear Sir,

Sub: Stop Production order issued on 13.07.2020 to M/s SPY Agro Industries Ltd.
- Request for revocation of stop production orders - Reg.

Ref: Stop production orders dt 13-7-2020.

I submit the following few lines for your kind consideration and explanation for the operation for the last two months following the Ammonia leakage at S.P.Y Agro Industries on 27th June 2020 and issuance of stoppage orders on 13th July 2020 by A.P. Pollution Control Board.

1. Firstly we would like to bring to your attention our immediate compliance to the orders, ceasing all production on 14th July 2020. On 19th July 2020, we were forced to restart distillation as the in-process wash had started putrifying, with volatile acids building to 1000++ ppm, if not processed, this would have created a problem with disposal. So, we ran the plant for 3 days between 19th of July and 22nd July after the accident took place 27-6-2020.. We then once again complied with the order shutting the unit .
2. On the 29th of July, we once again faced issue with inprocess liquids in the fermenter and biodigester culture. The 10 lakhliters of the wash in the fermenter needed to be processed and the biodigester needed effluent circulation as the biomethanation time is 10-15 days (28th July -5th August). Similarly we needed to run the aeration plant to control the COD and BOD in the effluent. The company was also putting into operation the scrubber mandated by the PCB on the wet caking drying plant. The plant was running well below full installed capacity. Unfortunately, the boiler while being run to support the captive powerplant, the only power source for the unit, experienced a failure of an internal tube which led to hot water being sprayed outside the metal casing. A nearby employee in the panic caused by the failure ran into the stream of hot water and suffered burns. Though he was promptly taken to the hospital, the COVID-19 situation meant that he was not attended to it and he passed away. The plant was then immediately stopped after all effluent fluids were drained.



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41

3. On 30th August 2020, we have requested the Chief Inspector of Factories to issue a temporary revocation to process a further 40 lakh litres of wash. The department requested us to complete a safety audit and furnish details regarding the precautions taken to avoid a similar incident. We then submitted the same and started operation on 10thSeptember up to 18thSeptember 2020.

It is humbly submit that the Deputy chief inspector of Factories has issue revocation order on 05.10.2020 copy is enclosed for your kind information where as we have also applied for fire department for NOC which is under process and will be issued within 10 days, also we would like to inform you that we have submitted commitment letter which is enclosed for your kind information .

In view of the above reasons, we request the Member Secretary, A.P. Pollution Control Board not to consider these operations as violations and to consider our efforts in good faith to comply with your guidelines. All the tasks indicated by the board to further make our plant cleaner and greener would be followed from time to time. Hence, we request you to issue revocation orders of the stoppage to allow power plant and distillery operations of the unit keeping in view the welfare of the employees and their families and local economy and indirect dependents.

Thanking You sir,
Yours Faithfully,
For S.P.Y Agro Industries Limited.,


Director.

Copy to: 1) Honourable National Green Tribunal committee member, CPCB, Bangalore
2)The Joint Chief Environmental Engineer, APPCB- Zonal Office, KURNOOL



42

S.P.Y. Agro Industries Limited

CIN No.: U01100TG2005PLC045887

To
The Environmental Engineer,
APPCB- Regional Office,
KURNOOL

Date: 20.10.2020

LETTER OF UNDERTAKING

Dear Sir,

M/s S. P. Y Agro Industries Limited, have already initiated all safety measures and precautions applicable for running the industry. We have conducted safety audit reports and mock drills also, we undertake that the sufficient due course will take such that will not be any accidents in future

The recommendation given in the safety audit and onsite emergency plan are being complied

And also we will operate Air Pollution Equipment's with proper records
We will take care of maintenance all the machine with qualified Engineer

We will maintain house keeping regularly

ETP will operated with good maintenance

We will provide husk & Ash in proper way

We will maintain dryer working condition

The area of wet cake will be cleanly maintained with proper drying with scrubber to avoid smell and air pollution.

Thanking you Sir,

Rijab
Yours Faithfully,
For S. P. Y Agro Industries Limited

Director

Regd. Office : D.No. 8-3-833, Plot No. 188, 1st Floor, Phase - II, Kamalapur Colony, Hyderabad - 500 073. T.S. INDIA
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11 T.C. 11



S.P.Y. Agro Industries Limited

CIN No.: U01100TG2005PLC045887

To
The Joint Chief, Environmental Engineer,
A.P. Pollution Control Board,
Zonal Office
KURNOOL .

DT: 20.10.2020

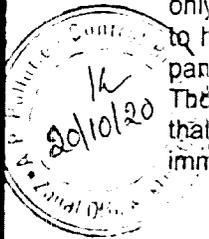
Dear Sir,

Sub: Stop Production order issued on 13.07.2020 to M/s SPY Agro Industries Ltd.
- Request for revocation of stop production orders - Reg.

Ref: Stop production orders dt 13-7-2020.

I submit the following few lines for your kind consideration and explanation for the operation for the last two months following the Ammonia leakage at S.P.Y Agro Industries on 27th June 2020 and issuance of stoppage orders on 13th July 2020 by A.P. Pollution Control Board.

1. Firstly we would like to bring to your attention our immediate compliance to the orders, ceasing all production on 14th July 2020. On 19th July 2020, we were forced to restart distillation as the in-process wash had started putrifying, with volatile acids building to 1000++ ppm, if not processed, this would have created a problem with disposal. So, we ran the plant for 3 days between 19th of July and 22nd July after the accident took place 27-6-2020.. We then once again complied with the order shutting the unit .
2. On the 29th of July, we once again faced issue with inprocess liquids in the fermenter and biodigester culture. The 10 lakhliters of the wash in the fermenter needed to be processed and the biodigester needed effluent circulation as the biomethanation time is 10-15 days (28th July -5th August). Similarly we needed to run the aeration plant to control the COD and BOD in the effluent. The company was also putting into operation the scrubber mandated by the PCB on the wet caking drying plant. The plant was running well below full installed capacity. Unfortunately, the boiler while being run to support the captive powerplant, the only power source for the unit, experienced a failure of an internal tube which led to hot water being sprayed outside the metal casing. A nearby employee in the panic caused by the failure ran into the stream of hot water and suffered burns. Though he was promptly taken to the hospital, the COVID-19 situation meant that he was not attended to it and he passed away. The plant was then immediately stopped after all effluent fluids were drained.



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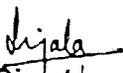
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3. On 30th August 2020, we have requested the Chief Inspector of Factories to issue a temporary revocation to process a further 40 lakh litres of wash. The department requested us to complete a safety audit and furnish details regarding the precautions taken to avoid a similar incident. We then submitted the same and started operation on 10th September up to 18th September 2020.

It is humbly submit that the Deputy chief Inspector of Factories has issue revocation order on 05.10.2020 copy is enclosed for your kind information where as we have also applied for fire department for NOC which is under process and will be issued within 10 days, also we would like to inform you that we have submitted commitment letter which is enclosed for your kind information .

In view of the above reasons, we request the Member Secretary, A.P. Pollution Control Board not to consider these operations as violations and to consider our efforts in good faith to comply with your guidelines. All the tasks indicated by the board to further make our plant cleaner and greener would be followed from time to time. Hence, we request you to issue revocation orders of the stoppage to allow power plant and distillery operations of the unit keeping in view the welfare of the employees and their families and local economy and indirect dependents.

Thanking You sir,
Yours Faithfully,
For S.P.Y Agro Industries Limited.,


Director.

Copy to: 1) Honourable National Green Tribunal committee member, CPCB,
Bangalore
2) The Environmental Engineer, APPCB- Regional Office, KURNOOL



S.P.Y. Agro Industries Limited

CIN No.: U01100TG2005PLC045887

45

To
The Environmental Engineer,
APPCB- Regional Office,
KURNOOL

Date: 20.10.2020

LETTER OF UNDERTAKING

Dear Sir,

M/s S. P. Y Agro Industries Limited, have already initiated all safety measures and precautions applicable for running the industry. We have conducted safety audit reports and mock drills also, we undertake that the sufficient due course will take such that will not be any accidents in future

The recommendation given in the safety audit and onsite emergency plan are being complied

And also we will operate Air Pollution Equipment's with proper records
We will take care of maintenance all the machine with qualified Engineer

We will maintain house keeping regularly

ETP will operated with good maintenance

We will provide husk & Ash in proper way

We will maintain dryer working condition

The area of wet cake will be cleanly maintained with proper drying with scrubber to avoid smell and air pollution.

Thanking you Sir,

Rijab
Yours Faithfully,

For S. P. Y Agro Industries Limited

Director

Regd. Office : D.No. 8-3-833, Plot No. 188, 1st Floor, Phase - II, Kamalapuri Colony, Hyderabad - 500 073. T.S. INDIA
E-mail: spyagroindustries@gmail.com

Works : New Industrial Estate, Sy. No. 446 to 449, APIIC, Udumalpur, Nandyal, Kurnool Dt.-518 502. A.P. INDIA
Phone: +91 8514 222084, Fax: 08514-222082, E-mail: spyagro_nandigroup@yahoo.com

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11 T.C. 11



S.P.Y. Agro

S.P.Y. Agro Industries Limited

46 8/C

CIN No.: U01100TG2005PLC045887

To
Honourable National Green Tribunal committee member,
CPCB,
Bangalore .

DT: 20.10.2020

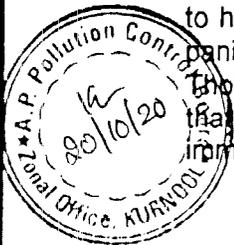
Dear Sir,

Sub: Stop Production order issued on 13.07.2020 to M/s SPY Agro Industries Ltd.
– Request for revocation of stop production orders – Reg.

Ref: Stop production orders dt 13-7-2020.

I submit the following few lines for your kind consideration and explanation for the operation for the last two months following the Ammonia leakage at S.P.Y Agro Industries on 27th June 2020 and issuance of stoppage orders on 13th July 2020 by A.P. Pollution Control Board.

1. Firstly we would like to bring to your attention our immediate compliance to the orders, ceasing all production on 14th July 2020. On 19th July 2020, we were forced to restart distillation as the in-process wash had started putrifying, with volatile acids building to 1000++ ppm, if not processed, this would have created a problem with disposal. So, we ran the plant for 3 days between 19th of July and 22nd July after the accident took place 27-6-2020.. We then once again complied with the order shutting the unit .
2. On the 29th of July, we once again faced issue with inprocess liquids in the fermenter and biodigester culture. The 10 lakhliters of the wash in the fermenter needed to be processed and the biodigester needed effluent circulation as the biomethanation time is 10-15 days (28th July –5th August). Similarly we needed to run the aeration plant to control the COD and BOD in the effluent. The company was also putting into operation the scrubber mandated by the PCB on the wet caking drying plant. The plant was running well below full installed capacity. Unfortunately, the boiler while being run to support the captive powerplant, the only power source for the unit, experienced a failure of an internal tube which led to hot water being sprayed outside the metal casing. A nearby employee in the panic caused by the failure ran into the stream of hot water and suffered burns. Though he was promptly taken to the hospital, the COVID-19 situation meant that he was not attended to it and he passed away. The plant was then immediately stopped after all effluent fluids were drained.



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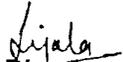
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3. On 30th August 2020, we have requested the Chief Inspector of Factories to issue a temporary revocation to process a further 40 lakh litres of wash. The department requested us to complete a safety audit and furnish details regarding the precautions taken to avoid a similar incident. We then submitted the same and started operation on 10th September up to 18th September 2020.

It is humbly submit that the Deputy chief inspector of Factories has issue revocation order on 05.10.2020 copy is enclosed for your kind information where as we have also applied for fire department for NOC which is under process and will be issued within 10 days, also we would like to inform you that we have submitted commitment letter which is enclosed for your kind information .

In view of the above reasons, we request the Member Secretary, A.P. Pollution Control Board not to consider these operations as violations and to consider our efforts in good faith to comply with your guidelines. All the tasks indicated by the board to further make our plant cleaner and greener would be followed from time to time. Hence, we request you to issue revocation orders of the stoppage to allow power plant and distillery operations of the unit keeping in view the welfare of the employees and their families and local economy and indirect dependents.

Thanking You sir,
Yours Faithfully,
For S.P.Y Agro Industries Limited.,


Director.

Copy to: 1) The Joint Chief, Environmental Engineer, APPCB- Zonal Office, KURNOOL

2) The Environmental Engineer, APPCB, Regional Office , Kumool



S.P.Y. Agro

S.P.Y. Agro Industries Limited

48

CIN No.: U01100TG2005PLC045887

To
The Environmental Engineer,
APPCB- Regional Office,
KURNOOL

Date: 20.10.2020

LETTER OF UNDERTAKING

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Kijab
Yours Faithfully,

For S. P. Y Agro Industries Limited

Director

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