



TELANGANA STATE POLLUTION CONTROL BOARD

Paryavarana Bhavan, A-III, Industrial Estate, Sanathnagar, Hyderabad-500 018
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BY REGD. POST WITH ACK. DUE

Order No. MHB- 40/TSPCB/U-V/TF/2020-

40.

Dt:06.04.2020

Sub : M/s. SNS Starch Ltd., Kodair (V), Itikyal (M), Mahaboobnagar District – Water (Prevention and Control of Pollution) Amendment Act, 1988 – Air (Prevention and Control of Pollution) Amendment Act, 1987 – **Extension of Temporary Revocation of Closure Orders** – Issued – Reg.

Ref : 1. Order No. MHB-40/TSPCB/U-I/TF/2020-2335, dated 29.01.2020.
2. Inspection of your industry by the Board Office on 17.02.2020.
3. Hearing held on 04.03.2020 at Board office, Hyderabad.

1. WHEREAS, you are operating the industry located at Kodair (V), Itikyal (M), Mahaboobnagar District and engaged in production of Maize starch & bio-mass power plant.
2. WHEREAS, the Board issued Renewal of CFO vide order dated 19.01.2019 which is valid upto 31.03.2023.
3. WHEREAS, the Board vide order dated 29.01.2020 issued extension of temporary revocation of closure order valid upto 31.01.2020.
4. WHEREAS, the Board official inspected your industry on 17.02.2020 and observed the following :
 - i. The industry consumes 560 KLD i.e., Process & Washings – 350 KLD, Cooling / Boiler – 200 KLD and Domestic – 10 KLD. The industry total waste water generation 268 KLD i.e., Process & Washings – 230 KLD, Cooling / Boiler Blow Down – 30 KLD and Domestic – 8 KLD.
 - ii. The industry generates wastewater 268 KLD i.e., from Process & washing - 230 KLD and cooling / boiler blow down - 30 KLD (After treatment in ETP, the treated water shall be used on land for irrigation within their factory premises. Domestic effluents – 8 KLD (Septic tank followed soak pit).
 - iii. The industry has ETP and operating with following are as follows:
Equalization tank → Buffer Tank → UASB Digester → Gas holder tank → Primary Clarifier → Anoxic tank → Aeration Tank → Secondary Clarifier → Mixing tank → Collection tank → Sludge sump → Carbon & sand filters → Activated Charcoal filters → Sludge de-watering tank.
 - iv. The industry has concrete lined two lagoons and also another one unlined lagoon within the premises. The industry is storing effluents in lined lagoon - 1 & 2 No lagoon & from their directly pumping to gardening.
 - v. During inspection ETP was in operation & the Board officials have collected legal samples from i) Inlet of ETP(collection tank). ii) UASB reactor iii) Aeration tank iv) Out let of ETP from Lined lagoon-I v) Lined lagoon-II vi) Stagnated water unlined lagoon vii) Stagnated water with in the industry irrigation land and submitted to central laboratory for analysis. The analysis results are awaited.
 - vi. During inspection, the Board officials have collected sample from lake Lakshamma cheruvu.
 - vii. The industry has Bio gas / bio-mass fired Boiler with 25 TPH with ESP as air pollution control equipment by providing of about 40 m height. The industry has installed the continuous online stack monitoring equipment to the 25 TPH Boiler. During inspection , the industry has connected online stack monitoring to the TSPCB Server & the value shown as 70.10 mg/Nm³.
 - viii. The industry has provided silo for storage of boiler ash but during inspection ash was stored openly.
 - ix. The industry has provided continuous Ambient Air Quality Monitoring Systems for H₂S with display system near ETP Lab. During inspection online reading was observed as 5 PPM. The industry has not connected AAQM Systems for H₂S to TSPCB server.
 - x. The industry has not developed internal asphalted / concreted roads within the premises. However, they have compact Road with stone and sand.
 - xi. The industry has provided digital flow meter between collection tank and equalization tank and also provided digital flow meter after buffer tank but not provided flow meter at outlet.
 - xii. During inspection, it was observed that spillages and sludge deposited near the ETP area.
 - xiii. The industry has provided shed for storage of Solid waste, However, the industry has stored solid waste openly instead of shed.

xiv. The following is the compliance on Extension of Temporary Revocation of Closure Orders dated 29.01.2020:

Sl. No.	Condition	Compliance
1.	The industry shall not operate without consent of the Board	The industry has obtained CFO of the Board vide order dt: 19.01.2019 for manufacturing of Maize Starch - 60000 MTPA, Maize Germs- 5850 MTPA, Maize Gluten - 4500 MTPA, Maize Fiber - 10000 MTPA & Electricity (Captive consumption) (Fuel: Biomass/Bio gas (Poultry litter, Cotton stacks, rice husk, corn, cobs) - 3.5 MW which is valid upto 31.03.2023.
2.	The industry shall comply with the CFO&HWA conditions scrupulously	The compliance of CFO conditions are below:
3.	The industry shall operate the ETP continuously to meet the standards prescribed by the Board	During inspection ETP was in operation & the Board officials have collected legal samples from i) Inlet of ETP(collection tank). ii) UASB reactor iii) Aeration tank iv) Out let of ETP from IIned lagoon-I v) Lined lagoon-II vi) Stagnated water unlined lagoon vii) Stagnated water with in the industry irrigation land and submitted to central laboratory for analysis. The analysis results are awaited.
4.	The Industry shall maintain continuous Ambient Air Quality Monitoring Systems for H ₂ S with display system.	The industry has provided continuous Ambient Air Quality Monitoring Systems for H ₂ S with display system near ETP Lab. During inspection online reading was observed as 5 PPM. The industry has not connected AAQM Systems for H ₂ S to TSPCB server.
5.	The industry shall utilize Bio-gas as fuel in the Boiler and excess shall be flared to avoid nuisance.	The industry has installed flare stack to gas collection system to flare out the gases escaping into the atmosphere. The representative of the industry has informed that they are utilizing Bio-gas as fuel in the Boiler and excess is flared.
6.	The industry shall maintain digital flow meters provided at inlet and outlet of ETP to assess quantity of effluent generation and treatment	The industry has provided digital flow meter between collection tank and equalization tank and also provided digital flow meter after buffer tank
7.	The industry shall continuously operate the ESP provided to the boiler so as to meet the emission standards. The Continuous online monitoring system is connected by the industry. Hence, the same shall be connected to TSPCB server	The industry has Bio gas / bio-mass fired Boiler with 25 TPH with ESP as air pollution control equipment by providing of about 40 m height. The industry has installed the continuous online stack monitoring equipment to the 25 TPH Boiler. During inspection , the industry has connected online stack monitoring to the TSPCB Server & the value shown as 70.10 mg/Nm ³ .
8.	Storage of raw material shall be in roof sheds, water spray system shall be provided all around the stockpiles and dust suppression system around the conveyor system	The industry stored raw materials in the roof shed.
9.	The industry shall ensure that there shall not be any odour nuisance within or outside the premises.	During inspection, the odour nuisance was observed near the ETP area due to spillages and sludge deposited near the ETP area

The Compliance of the Schedule – B conditions of CFO order is as follows:

S.NO	CONDITION	COMPLIANCE																
1.	Total Water consumption shall not exceed 560 KLD: <table border="1"> <thead> <tr> <th>Sl.No.</th> <th>Purpose</th> <th>Quantity</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Process & Washing</td> <td>350.0 KLD</td> </tr> <tr> <td>2.</td> <td>Boiler feed & Industrial cooling</td> <td>200.0 KLD</td> </tr> <tr> <td>3.</td> <td>Domestic</td> <td>10.0 KLD</td> </tr> <tr> <td></td> <td>Total</td> <td>560.0 KLD</td> </tr> </tbody> </table>	Sl.No.	Purpose	Quantity	1.	Process & Washing	350.0 KLD	2.	Boiler feed & Industrial cooling	200.0 KLD	3.	Domestic	10.0 KLD		Total	560.0 KLD	The representative of the industry informed that they are taking steps to reduce water consumption.	
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2.	The effluent discharged should not contain constituents in excess of the tolerance limits prescribed below: <table border="1"> <thead> <tr> <th>Out let</th> <th>Parameters</th> <th>Standards (mg/l except for p^H)</th> </tr> </thead> <tbody> <tr> <td rowspan="6">1</td> <td>pH</td> <td>5.5-9.0</td> </tr> <tr> <td>TSS</td> <td>100</td> </tr> <tr> <td>TDS</td> <td>2100</td> </tr> <tr> <td>BOD</td> <td>30</td> </tr> <tr> <td>COD</td> <td>250</td> </tr> <tr> <td>Oil & Grease</td> <td>10.0</td> </tr> </tbody> </table>	Out let	Parameters	Standards (mg/l except for p ^H)	1	pH	5.5-9.0	TSS	100	TDS	2100	BOD	30	COD	250	Oil & Grease	10.0	During inspection, the Board officials have collected legal samples from i) Inlet of ETP(collection tank). ii) UASB reactor iii) Aeration tank iv) Out let of ETP from lined lagoon-I v) Lined lagoon-II vi) Stagnated water unlined lagoon vii) Stagnated water with in the industry irrigation land and submitted to central laboratory for analysis. The analysis results are awaited.
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3.	The emissions should not contain constituents in excess of the prescribed limits mentioned below: <table border="1"> <thead> <tr> <th>Chimney No.</th> <th>Parameters</th> <th>Particular</th> <th>Emission standards</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Attached to Bio gas / bio-mass fired Boiler of capacity 25 TPH</td> <td>SPM</td> <td>115 mg/Nm³</td> </tr> </tbody> </table>	Chimney No.	Parameters	Particular	Emission standards	1.	Attached to Bio gas / bio-mass fired Boiler of capacity 25 TPH	SPM	115 mg/Nm ³	Directed to comply								
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1.	Attached to Bio gas / bio-mass fired Boiler of capacity 25 TPH	SPM	115 mg/Nm ³															
4.	The industry shall comply with emission limits for DG sets upto 800 KW as per the Notification G.S.R.520 (E), dated 01.07.2003 under the Environment (Protection) Amendment Rules, 2003 and G.S.R.448(E), dated 12.07.2004 under the Environment (Protection) Second Amendment Rules, 2004. In case of DG sets more than 800 KW shall comply with emission limits as per the Notification G.S.R.489 (E), dated 09.07.2002 at serial no.96, under the Environment (Protection) Act, 1986.	--																
5.	The industry should comply with ambient air quality standards of PM ₁₀ (Particulate Matter size less than 10µm) - 100 µg/ m ³ ; PM _{2.5} (Particulate Matter size less than 2.5 µm) - 60 µg/ m ³ ; SO ₂ - 80 µg/ m ³ ; NO _x - 80 µg/m ³ , outside the factory premises at the periphery of the industry. Standards for other parameters as mentioned in the National Ambient Air Quality Standards CPCB Notification No. B-29016 /20/90 /PCI-I, dated:18.11.2009. Noise Levels: Day time (6 AM to 10 PM) - 75 dB (A) Night time (10 PM to 6 AM) - 70 dB (A).	Directed to comply																
6.	The industry shall not manufacture any un-consented products and exceeding capacities without obtaining prior consent for establishment CFE and consent for operation CFO of the Board	Complying.																

7.	The industry shall operate ETP continuously to treat effluent to meet the standards.	During inspection ETP was in operation & the Board officials have collected legal samples from i) Inlet of ETP(collection tank). ii) UASB reactor iii) Aeration tank iv) Out let of ETP from lined lagoon-I v) Lined lagoon-II vi) Stagnated water unlined lagoon vii) Stagnated water with in the industry irrigation land and submitted to central laboratory for analysis.
8.	The industry shall ensure that there shall not be any odour / smell nuisance emanated during operation of the unit.	During inspection, the odour nuisance was observed near the ETP area due to spillages and sludge deposited near the ETP area
9.	The industry shall install and maintain Continuous Ambient Air Quality Monitoring System (CAAQMS) for H ₂ S near the boundary wall towards the village side and connect to TSPCB website, as committed during the meeting.	Not complied
10.	The industry shall utilize Bio-gas as fuel in the Boiler and excess shall be flared to avoid nuisance.	The industry has installed flare stack to gas collection system to flare out the gases escaping into the atmosphere. The representative of the industry has informed that they are utilizing Bio-gas as fuel in the Boiler and excess is flared.
11.	The industry shall provide concrete/Asphalted roads within the premises within 3 months.	The industry has not developed internal asphalted / concreted roads within the premises. However, they have compacted the road with stone and sand.
12.	The industry shall not discharge any effluent within / outside the industry premises.	During inspection, it was observed stagnated effluents were observed with in the industry irrigation land & The Board officials have collected sample from Stagnated water with in the industry irrigation land. The representative of the industry has informed that the treated water from the lagoons is discharging into the irrigation land.
13.	The industry shall comply with the directions/ standards as committed vide Ir date 02.01.2019	Compliance of the Temporary Revocation of Closure Order dated 29.01.2020 are tabulated above.
14.	The industry shall submit Bank Guarantee of Rs. 15 Lakhs towards commitment to comply with Board conditions / directions at RO, Hyderabad with 6 months as committed vide Ir date 02.01.2019	Not submitted.
15.	The Bank Guarantee amount will be forfeited of the industry fails to comply with standards / conditions / directions of the Board.	--
16.	Poultry litter shall be transported from the poultry farms to the project site in dry form in covered trucks to avoid odour nuisance.	
17.	The Poultry litter shall be transported from the poultry farms to the project site in dry form in covered trucks to avoid odour nuisance.	During inspection, no moment of trucks carrying poultry litter were observed.
18.	The industry shall take proper care in storage of poultry litter in closed sheds under negative pressure to prevent noxious odour escaping into atmosphere. The storage capacity of silo shall not be more than 3 days at project site.	However the representative of the industry informed that they are not using poultry litter as a fuel in the Boiler. At present they are using husk as fuel in the boiler.
19.	Fuel shall be conveyed through closed conveyor from storage shed to boiler.	The industry has provided cladding to the belts carrying fuel to the boiler
20.	Suitable vector control measures shall be taken to control flies and other vectors.	--

21.	The industry shall maintain online stack monitor for the stack attached to coal fired boiler connected the data to TSPCB servers.	The industry has Bio gas / bio-mass fired Boiler with 25 TPH with ESP as air pollution control equipment by providing of about 40 m height. The industry has installed the continuous online stack monitoring equipment to the 25 TPH Boiler. During inspection , the industry has connected online stack monitoring to the TSPCB Server & the value shown as 70.10 mg/Nm3.
22.	Storage of raw material shall be in roof sheds, water spray system shall be provided all around the stockpiles and dust suppression system around the conveyor system.	The industry stored raw materials in the roof shed
23.	The industry shall maintain greenbelt as per norms.	The industry has total land of 47 Acres. The industry has developed greenbelt in an area of about 20.0 Acres.
24.	The industry shall maintain concreted internal roads by cleaning regularly to avoid fugitive emissions due to vehicular moment.	The industry has not developed internal asphalted / concreted roads within the premises. However, they have compacted the road with stone and sand.
25.	The industry shall maintain separate energy meters for recording energyconsumption for air pollution control equipment and maintain record for daily energy consumption.	complied
26.	The industry shall comply with Task Force directions issued by the Board from time to time.	Compliance of the Temporary Revocation of Closure Order dated 29.01.2020 are tabulated above.
27.	The industry shall comply with the Fly Ash notification dt. 27.08.2013 pertaining to captive power generation.	Directed to comply
28.	The applicant shall submit Environmental Statement in Form – V to the Regional Office before 30 th September of every year as per Rule No.14 of E(P) Rules, 1986 & amendments thereof	Not submitted.
29.	The conditions stipulated in this order are without any prejudice to rights and contentions of this Board in any Hon'ble Court of Law.	--

5. WHEREAS, Sree Kottam Tulsi Reddy, Memorial Education Society has filed an application No. 107 of 2017 before Hon'ble NGT (PB), New Delhi against Air & Water Pollution being caused by M/s. SNS Starch Ltd., Kodair (V), Itikyal (M), Mahaboobnagar District.

6. WHEREAS, the National Green Tribunal (NGT), vide order dated 15.03.2019 listed the matter on 12.04.2019 and the case was further posted on 20.05.2019. The above case came up for hearing on 17.01.2020 & on 12.02.2020 and directed the following:

"Neither the applicant has submitted a note with regard to environment damage/compensation nor the State Pollution Control Board has made the assessment, as ordered by us on the earlier date of hearing.

Last opportunity is granted to the State Pollution Control Board to give us a note with regard to environment damage caused and the amount of compensation and restoration be assessed for the period when the company was non compliant.

List the matter on 28th February, 2020".

7. WHEREAS, the Board vide letter dt:06.02.2020 requested the District Collector, Mahabubnagar to constitute a Multi Disciplinary Committee comprising of Officials of Revenue, Agriculture, Ground Water and Pollution Control Board to assess the environmental damage.

8. WHEREAS, as per the directions of the Hon'ble NGT, the Board has carried out assessment of the Environmental Compensation for the period during which the industry was non-complaint. The committee constituted for assessment and finalization of the Environmental Compensation noticed that the industry was non compliant with the consent conditions and not complying with directions issued. The committee recommended that EC to be levied against the industry as per the Methodology / guidelines of CPCB adopted by the Board.
9. WHEREAS, the status was reviewed before the committee constituted for assessment and finalizing of Environmental Compensation on 19.02.2020.

The committee noted that the Regional Officer, Hyderabad vide Ir.dt:01.02.2020 submitted a detailed report on assessment of the environmental compensation on above industry with total nos. of days of violation (**N**) as 553 days, Pollution Index of industrial sector (**PI**) as 80, Scale of Operation (**S**) as 1.5, Location Factor (**LF**) as 1 and Factor of Rupees (**R**) as Rs. 250/-. The committee also noted that earlier, the industry has not exceeded the effluent discharge standards, no discharges was observed the industry premises, most of the days the unit was sick/not in operation, the effluent generated is easily biodegradable and the treated effluents are applied for onland for irrigation. Hence, the committee recommended to consider the factor 'R' as Rs. 100/- instead of Rs. 250/-.

The committee after detailed discussion and careful consideration of the material facts of the case, recommended to impose environmental compensation as per the proposal submitted by Regional Officer i.e., with total nos. of days of violation (**N**) as 553 days, Pollution Index of industrial sector (**PI**) as 80, Scale of Operation (**S**) as 1.5, Location Factor (**LF**) as 1 and Factor of Rupees (**R**) as Rs. 100/- and as per Office Order dt:03.01.2020 issued on modalities / methodology of assessing, imposing and utilization of environmental compensation from the polluting units in the State of Telangana.

In view of the above, the environmental compensation is finalized as:

$$EC = 80 \times 553 \times 100 \times 1.5 \times 1 = \text{Rs. } 66,36,000/-$$

10. WHEREAS, the Board has finalized environmental compensation to be imposed on M/s. SNS Starch Ltd., Kodair (V), Itikyall (M), Mahaboobnagar District for the last five years during which, the industry was non compliant of the consent conditions and directions issued as Rs. 66,36,000/-
11. WHEREAS, the status of industry was reviewed in the Task Force Committee meeting held on 04.03.2020. Your unit representative has attended the meeting and stated that the unit is complying with the Board directions and requested for permanent revocation of closure orders.

The committee noted that the Board has carried out assessment of the Environmental Compensation (EC) during the period which the industry was non compliant. The EC agreed and finalized by the Board is Rs. 66,36,000/-. The committee was informed that the board has submitted the latest status as well as the report on assessment of EC to the Hon'ble NGT and the Hon'ble NGT has posted the matter on 18.03.2020 for further hearing. Based on the directions of the Hon'ble NGT, the Board will issue orders for payment of EC by the industry. The committee after detailed discussions, recommended to extend the temporary revocation of closure orders issued by the Board for a further period of 2 months from the date of this order with certain conditions.

12. The Board after careful consideration of all facts of the case, hereby extend the temporary revocation of Closure orders issued by the Board **for a further period of Two months from the date of this order** with the following conditions:
- The industry shall not operate without consent of the Board.
 - The industry shall comply with the CFO&HWA conditions scrupulously
 - The industry shall operate the ETP continuously to meet the standards prescribed by the Board
 - The industry shall utilize Bio-gas as fuel in the Boiler and excess shall be flared to avoid nuisance.
 - The industry shall maintain digital flow meters provided at inlet and outlet of ETP to assess quantity of effluent generation and treatment
 - The industry shall continuously operate the ESP provided to the boiler so as to meet the emission standards.
 - Storage of raw material shall be in roof sheds, regular water spray system shall be carried out all around the stockpiles and around the conveyor system
 - The industry shall ensure that there shall not be any odour nuisance within or outside the premises.

13. The T.S.S.P.D.C.L has been directed to extend the restoration of power supply to your industry temporarily for a **further period of two months from the date of this order.**
14. These orders are issued under Section 33(A) of the Water (Prevention and Control of Pollution) Amendment Act, 1988 and under Section 31(A) of the Air (Prevention and Control of Pollution) Amendment Act, 1987.
15. You are hereby directed to note that, should you misuse these orders to operate the unit violating any of the conditions mentioned above, your unit will be closed under section 33(A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and section 31(A) of the Air (Prevention and Control of Pollution) Amendment Act, 1987. You will also be liable for prosecution in the court of Metropolitan Magistrate or Judicial Magistrate of the first class under section 41(2) of the Water (Prevention and Control of Pollution) Amendment Act, 1988 and under section 37(1) of the Air (Prevention and Control of Pollution) Amendment Act, 1987, the punishment for which includes imprisonment for a term which shall not be less than one year six months and which may be extended to six years with fine.


**Sd/-
MEMBER SECRETARY**

**To
M/s. SNS Starch Ltd.,
Kodair (V), Itikyal (M),
Mahabubnagar District**

Copy to :

1. The District Collector, Mahabubnagar District for kind information.
2. The Superintending Engineer (Operations), TSSPDCL. Mettugadda, Mahaboobnagar for information and necessary action.
3. The JCEE, ZO-Hyderabad for information and necessary action.
4. The EE, RO-Hyderabad for information and necessary action.
5. Concerned file.

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


**Senior Environmental Engineer (FAC)
(UH - V)**

