

# THE ANDHRA SUGARS LIMITED

Venkatarayapuram : Tanuku - 534 215, Andhra Pradesh, India.



Ref: ETP/ASP/APPCB/2022/38

Date: 05-07-2022

To

The Member Secretary,  
AP Pollution Control Board,  
D.No.33-26-14D/2, Near Sunrise Hospital, Pushpa Hotel Centre,  
Chalamavari Street, Kasturibaipet,  
VIJAYAWADA - 520010

Dear Sir,

**Sub:** Submission of CFE compliance Report of ASPIRIN plant – Reg.

\* \* \*

With reference to consent order No. 327/APPCB/CFE/RO-ELR/HO/2015 dated: 09<sup>th</sup> July, 2015, we are submitting herewith the half yearly CFE compliance report relating to our Aspirin plant.

This is for your kind information.

Thanking You,

Yours faithfully,  
For The Andhra Sugars Limited

  
(PVS VISWANADHA KUMAR)  
ADDL. SECRETARY.

CC: The Environmental Engineer  
A.P.Pollution Control Board,  
Regional Office, D.No.22 B - 3-2,  
Kanukolanu Vari Street,  
Near Power Pet Railway Station / Near Sivalayam,  
Eluru – 534 002.

Encl: As above.

069355



**CONDITIONS OF CONSENT TO ESTABLISH  
ORDER NO. 327 /APPCB/CFE/RO-ELR/HO/2015; DATED 09<sup>th</sup> JULY, 2015-  
ASPIRIN PLANT, COMPLIANCE PERIOD: JANUARY –JUNE, 2022**

<b>PART - A: SPECIFIC CONDITIONS</b>		
<b>S. No</b>	<b>Condition</b>	<b>Compliance Status</b>
1	Progress on implementation of the project shall be reported to the concerned Regional Office, A.P. Pollution Control Board, once in six months.	Condition will be noted same is being followed
2	Separate energy meters shall be provided for Effluent Treatment Plant (ETP) and Air Pollution Control equipment's to record energy consumed.	<b>Complied.</b> Energy meters were provided at effluent treatment plant and air pollution control measures (scrubbers)
3	The proponent shall obtain Consents for Operation (CFO) from APPCB, as required Under Sec.25/26 of the Water (P&C of P) Act, 1974 and under sec. 21/22 of the Air (P&C of P) Act, 1981, before commencement of the activity.	<b>Complied.</b> Obtained CFO vide order no. APPCB/VSP/RJY/16306/HO/CFO /2021 dated 31.07.2021 valid till 30.06.2026.
4	Notwithstanding anything contained in this conditional letter or consent, the Board hereby reserves its right and power Under Sec.27 (2) of Water (Prevention and Control of Pollution) Act, 1974 and Under Sec.21 (4) of Air (Prevention and Control of Pollution) Act, 1981 to review any or all the conditions imposed herein and to make such alternation as deemed fit and stipulate any additional conditions by the Board.	Condition noted
5	The consent of the Board shall be exhibited in the factory premises at a conspicuous Place for the information of the inspecting officers of different departments.	<b>Complied.</b>
6	Compensation is to be paid for any environmental damage caused by it, as fixed by the Collector and District Magistrate as civil liability.	Condition will be noted Same will be followed
7	Floor washing shall be admitted into the effluent collection system only and shall not be allowed to find their way in storm drains or open areas. The industry shall maintain a good housekeeping. All pipe valves, sewers, drains shall be leak proof. Dyke walls shall construct around storage of chemicals.	<b>Complied.</b> Floor washings are being collected in a separate collection tank and send to effluent treatment plant for further treatment and reuse.
8	Rain Water Harvesting (RWH) structure (s) shall be established on the plant site. The proponent shall ensure that effluent shall not enter the Rain Water harvesting structure.	<b>Complied.</b> Rain Water Harvesting (RWH) structures are provided to recharge the ground water levels. No effluent

		is entering the RWH.																																												
9	The rules and regulations notified by Ministry of Law and Justice, GOI, regarding the Public Liability Insurance Act, 1991 shall be followed.	Condition will be noted Same will be followed.																																												
10	This order is valid for period of 5 years from the date of issue.	Condition noted																																												
<b>PART - B: GENERAL CONDITIONS</b>																																														
1	<p>The source of water is Canal water/Bore well and the maximum permitted water consumption after expansion is as following:</p> <table border="1"> <thead> <tr> <th rowspan="2">S. No</th> <th rowspan="2">Purpose</th> <th colspan="3">Quantity (KLD)</th> </tr> <tr> <th>as per CFO Dt. 26.11.2013</th> <th>Expansion</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Process &amp; washings</td> <td>63</td> <td>53</td> <td>116</td> </tr> <tr> <td>2</td> <td>Cooling make-up /Humidification/ Water/spraying</td> <td>10</td> <td>10</td> <td>20</td> </tr> <tr> <td>3</td> <td>Domestic</td> <td>20</td> <td></td> <td>20</td> </tr> <tr> <td colspan="2"><b>Total</b></td> <td><b>93</b></td> <td><b>63</b></td> <td><b>156</b></td> </tr> </tbody> </table>	S. No	Purpose	Quantity (KLD)			as per CFO Dt. 26.11.2013	Expansion	Total	1	Process & washings	63	53	116	2	Cooling make-up /Humidification/ Water/spraying	10	10	20	3	Domestic	20		20	<b>Total</b>		<b>93</b>	<b>63</b>	<b>156</b>	<p><b>Complied.</b> Source of water is bore well. Water consumption readings are well within the limits.</p>																
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3	The industry shall treat the domestic waste water in the existing biological ETP along with LTDS effluents.	<b>Complied.</b> Domestic wastewater is sent to bio ETP along with LTDS effluent stream for treatment and reuse.																								
4	The existing Effluent Treatment Plant (ETP) shall be operated effectively to achieve the Standards. All the units of the ETP shall be impervious to prevent ground water pollution.	<b>Complied.</b> No ground water pollution is anticipated due to ETP operations.																								
5	The industry shall segregate the effluent into High TDS and low TDS & Low COD streams and shall adopt "Zero Discharge" scheme and in no case the treated effluent / untreated effluent shall be discharged outside the factory premises.	<b>Complied.</b> Industry has segregated the effluents source itself and installed separate treatment systems for Low TDS and High TDS effluents.																								
6	The industry shall install magnetic flow meters with totalizers at inlets and outlets of MEE System, ETP & RO plants for the purpose of measuring the effluent generation and disposal.	<b>Complied.</b> Industry has installed separate magnetic flow meters for effluent treatment systems and these are connected to online continuous effluent monitoring systems.																								
7	Separate meters with necessary pipe-line shall be provided for assessing the quantity of water used for each of the purposes mentioned below. a) Industrial cooling, boiler feed. b) Domestic purposes c) Processing, whereby water gets polluted and pollutants are easily bio-degradable. d) Processing, whereby water gets polluted and the pollutants are not easily bio-degradable.	<b>Complied.</b> Magnetic flow meters are provided.																								
<b>Air</b>																										
8	The proponent shall comply with the following after expansion: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;">S. No</th> <th style="width: 35%;">Details of Stack</th> <th style="width: 20%;">Stack - I</th> <th style="width: 20%;">Stack II</th> </tr> </thead> <tbody> <tr> <td>a)</td> <td>Attached to</td> <td>Boiler</td> <td>DG Set</td> </tr> <tr> <td>b)</td> <td>Capacity</td> <td>12 TPH</td> <td>860 KVA</td> </tr> <tr> <td>c)</td> <td>Fuel</td> <td>Natural</td> <td>Diesel</td> </tr> <tr> <td>d)</td> <td>Stack height above the ground (m)</td> <td>40 m.</td> <td>6 m.</td> </tr> <tr> <td>e)</td> <td>Details of Air Pollution Control Equipment</td> <td>--</td> <td>Silencer &amp; muffler</td> </tr> </tbody> </table>	S. No	Details of Stack	Stack - I	Stack II	a)	Attached to	Boiler	DG Set	b)	Capacity	12 TPH	860 KVA	c)	Fuel	Natural	Diesel	d)	Stack height above the ground (m)	40 m.	6 m.	e)	Details of Air Pollution Control Equipment	--	Silencer & muffler	<b>Complied.</b> Steam and power are withdrawn from existing sugar complex.
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9	The industry shall provide dedicated multi stage scrubbers to the process vents to control the process emissions. The industry shall provide online pH monitoring system to the scrubbers provided to treat the process emissions. Scrubbed liquid shall be recycled as far as possible and sold to actual users. The industry shall keep the record of disposal of all such by-products/waste and shall regularly submit details to the concerned Regional Officer,	<b>Complied.</b> All the process vents are connected to dedicated two stage scrubbing system. Dilute caustic soda solution is circulated to the scrubber to absorb the particulate matter and the scrubbed liquid is recycled to the process. Industry has provided digital pH meter for scrubbers for monitoring the scrubbing liquid pH.																								

	APPCB.	Industry is reusing the scrubbing liquid in the main process.
10	Fugitive emissions shall be controlled by Closed transfer and handling of all hazardous solvents and chemicals. Vent condensers are to be provided to solvent storage tanks.	<b>Complied.</b> All the operations are being carried in complete closed system for raw material/solvent transfer.  Vent condenser will be provided whenever there is low boiling solvents storage anticipated.
11	The industry shall implement adequate measures to control all fugitive emissions from the plant.	<b>Complied.</b> The following control measures are being practised to mitigate fugitive emissions; a) Closed transfer system b) Reactor/dryer vents connected to condensing system c) Common vents connected to scrubbing system.
12	The proponent shall ensure compliance of the National Ambient Air quality standards notified by MoEFCC Gol vide notification No. GSR. 826(E), dated. 16.11.2009.	<b>Complied</b> Monitoring of ambient air quality was carried out on monthly basis through MoEF&CC, NABL approved third party laboratory. The monitoring data shows that the values are within NAAQ standards.
13	The proponent shall not cause odour nuisance in the surroundings	<b>Complied.</b> The following control measures are being practised to mitigate odour nuisance a) Closed transfer system b) Reactor/dryer vents connected to condensing system c) Common vents connected to scrubbing system.
14	The industry shall send the used /spent solvents to the recyclers and shall process them at their own solvent recovery plant within the plant premises. Solvents shall be recovered to the maximum extent possible and shall be reused.	<b>Complied.</b> Solvents used in process are recovered and reused in process.
15	The evaporation losses in solvents are to be controlled by taking the following measures: i) Chilled brine circulation shall be carried out to effectively reduce the solvent losses into the atmosphere. ii) Transfer of solvents shall be done by using pumps instead of manual handling. iii) Closed centrifuges shall be used so as to reduce the solvent losses drastically.	<b>Complied.</b>

	<p>iv) The reactor vents shall be connected with primary &amp; secondary condensers to prevent escaping of solvent vapor emissions into atmosphere.</p> <p>v) All the solvent storage tanks shall be connected with vent condensers to prevent escaping of solvent vapor emissions into atmosphere.</p>																																								
<b>Solid Waste</b>																																									
16	<p>The proponent has furnished the list of the following by-products from the proposed list of products. There shall not be any pollution load at on-site of the premises result in from reception, handling and disposal of these by-products / waste streams at source of the industry. The proponent shall maintain log registers on quantity of waste generation and details of end use of the waste disposed.</p> <table border="1"> <thead> <tr> <th>S.no</th> <th>Name of the By-Products</th> <th>Quantity after expansion (Kg/day)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Acetic Acid</td> <td>2378</td> </tr> <tr> <td>2</td> <td>Sodium Salicylate</td> <td>8049</td> </tr> </tbody> </table>	S.no	Name of the By-Products	Quantity after expansion (Kg/day)	1	Acetic Acid	2378	2	Sodium Salicylate	8049	<b>Complied.</b>																														
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18	<p>The following rules and regulations notified by the MOE&amp;F, GOI shall be implemented.</p> <p>a) Manufacture, Storage and Import of Hazardous</p>	Condition will be noted Same will be followed																																							

	Chemicals Rules, 1989. b) Hazardous waste (Management, Handling and Transboundary), Rules, 2008. c) Batteries (Management & Handling) Rules, 2010. d) E-Waste (Management & Handling) Rules, 2011.	
19	The industry shall place the chemical drums in a closed shed provided with concrete elevated platform only. The Platform shall be provided with sufficient dyke wall and spillage collection system.	<b>Complied.</b> A shed with elevated concrete platform is provided for storage of finished product with spillage collection and dyke wall provision.
20	Container & Container liners shall be detoxified at the specified covered platform with dyke walls and the wash wastewater shall be routed to effluent collection tank. After characterization the same shall be sent for treatment and disposal.	<b>Complied.</b>
<b>Other Conditions</b>		
21	Green belt shall be maintained all along the boundary of the industry in minimum 33% of the total area. The existing green belt shall not be disturbed in the proposed activity even after expansion.	<b>Complied.</b> 33% of greenbelt area was developed by industry.
22	System of leak detection and repair of pump / pipeline shall be installed in the plant and immediate response team shall be identified for preventive maintenance.	Will be Complied.
23	The industry shall isolate the storage of highly flammable chemicals, solvents & other raw materials from the rest of facilities in the plant premises.	<b>Complied.</b>
24	The industry shall ensure that there shall not be any change in the process technology, source of raw material and scope of working without prior approval from the Board.	Condition noted Same will be followed
25	The industry shall comply with all the directions issued by the Board from time to time.	<b>Complied.</b>
26	Concealing the factual data or submission of false information/ fabricated data and failure to comply with any of the conditions mentioned in this order and attract action under the provisions of relevant pollution control Acts.	Condition noted Same will be followed
27	The Board reserves its right to modify above conditions or stipulate new / additional conditions and to take action including revocation of this order in the interest of environment protection.	Condition noted
28	Any person aggrieved by an order made by the State Board under Section 25, Section 26, Section 27 of Water Act, 1974 or Section 21 of Air Act, 1981 may within thirty days from the date on	Condition will be noted Same will be followed

	<p>which the order is communicated to him, prefer an appeal as per Andhra Pradesh Water Rules, 1976 and Air Rules,1982, to such authority (hereinafter referred to as the Appellate Authority) constituted under Section 28 of Water (Prevention and Control of Pollution) Act,1974 and Section 31 of the Air (Prevention and Control of Pollution) Act, 1981.</p>	
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