



# Shree Renuka Sugars Ltd.

**Factory :** Unit I, RS No. 367/1,  
Vill. Munoli, Tal. Soundatti,  
Dist. Belagavi-591117. Karnataka.  
Tel. : 08330-277701/2/3 Fax : 08330-277189  
e-mail : plant@renukasugars.com

Ref: SRSL Unit-I /MoEF/EC Compliance 2019-20

Date:20/12/2019

To,  
The Director (SZ)  
Government of India Ministry of Environment, Forests & Climate Change.  
Regional Office (Southern Zone),  
Kendriya Sadan, 4th Floor, E & F Wings,  
17th Main Road, 2nd Block, Koramangala,  
Bangalore- 560 034. Ph : 080 – 25635907

**Respected Sir/Madam,**

**Sub:Half yearly Compliance report of Environmental clearance-reg**

**Ref: Environmental clearance No: SEIAA 22 IND 2017 Dated 19 June 2019**

This has reference to the above Subject and cited reference, We would like submit Here with point wise compliance to the Environmental clearance conditions for the period of 1<sup>st</sup> April 2019 to 30<sup>th</sup> September -2019

This is for your kind information & perusal

**Thanking You**  
**Yours faithfully**  
**For M/s Shree Renuka sugars Ltd., Munoli**

Abhaykumar S Khot  
General Manager (Works)



CC to : The Environmental Officer , KSPCB Belagavi -I

Encl: EC Compliance

**Shree Renuka Sugars Ltd, Unit-I Munoli**  
**Survey No.367/1 Tq: Soundatti,Dist: Belagavi,Karnataka -591117**

Ref: SEIAA 22 ND : 2017, Date: 19th June 2019

Compliance to the SEIAA clearance conditions

Date: 20.12.2019

SI No	Conditions	Compliance
1	This has reference to your online application dated 25 <sup>th</sup> September 2017 and 21 <sup>st</sup> February 2019 bearing proposal No.SIA/KA/IND2/20490/2017 addressed to SEIAA, Karnataka and subsequent letters addressed to SEIAA/SEAC Karnataka furnishing further information/seeking prior Environmental Clearance for the above project under the EIA Notification, 2006. The proposal has been appraised as per prescribed procedure in the light of the provisions under the EIA Notification,2006 on the basis of the mandatory documents enclosed with the application viz., the Application in Form 1. prefeasibility report ,EIA study report for proposed Expansion of sugar plant and co-generation power plant project and the additional clarifications furnished in response to the observations of the SEIAA and SEAC, Karnataka.	Noted.
2	It is inter-alia noted that the proponent had obtained Environmental Clearance vide letter No .SEIAA 16 IND 2007 dated 1 <sup>st</sup> July 2008 for expansion of sugar unit from 2500 TCD to 7500 TCD and 20.5 MW to 35.5 MW co-generation plant. The fresh water requirement was 117 KLD obtained from Malprabha river, 2250 TPD Bagasse to be used as fuel.	Noted
3	It is inter-alia noted that the proponent have now proposed for expansion of sugarcane Unit from 7500 TCD to 10000 TCD. The land area is 104.18 Acres out of which 54.88 Acres is Ground Coverage area (Total built up area including paved roads), 13.86 Acres is vacant land, and 35.44 Acres is for Landscape. No additional land and additional buildings are proposed, Total water requirement is 2541 KLD (2311 KLD is obtained from Sugarcane as condensate & 230 KLD will be sourced from Malprabha River as fresh water), out of which 50 KLD is for domestic purpose, 220 KLD is for sugar plant, 1430 KLD is for Cogen plant and 841 KLD is for Distillery .Power requirement will be met from Cogen unit DG sets of 1165 KVA X 1 No. and no proposal for new installation. 100 TPH, 50 TPH, 44 TPH and 26 TPH capacity boilers fuelled by Bagasse already exist in industry and no proposal for new	Noted, Proposed expansion project will be taken in existing setup of sugar plant. Sugar cane having 68 to 70% water. Out of that surplus water is 2311 KLD (i.e 23%), that will be reused for sugar plant utility ,Co-generation plant and Distillery plant and 230 KLD raw water will be drawn from River for Domestic as well industrial purpose. For expansion project power will be provided from existing co-generation plant. Boilers 100,50,44,& 26 TPH is being operated and DG set is operated during emergency . Only Bagasse will be used as fuel. No any proposal Boilers.

	installation.	
4	<p>The effluent generated from industry is 770 KLD and waste-water generated from Domestic usage is 30 KLD. The industrial effluent and domestic sewage shall be treated in the existing ETP and Septic tank respectively. The solids waste generated are 90,000 MT/ month of Bagasse will be used as fuel to Boilers. 12000, MT/month of Press Mud will be used for composting, 12,000 MT/month of Molasses will be used as raw material for Distillery, 441 MT/ month of Boiler ash be used as raw material for Compost, 12.0 MT/month of ETP sludge be used in Compost, 12.0 MT/month of Lime sludge shall be sent landfill and 0.5 KLPA of Used oil shall be sold to KSPCB authorized recyclers.</p>	<p>The effluent generated 770 KLPD and domestic effluent 30 KLPD will be treated in existing ETP and septic tank followed by soak pit respectively. Solid waste generation per month and utilization as below.</p> <ol style="list-style-type: none"> <li>1. Bagasse-90,000 MT will be used as fuel for Boilers.</li> <li>2. Molasses- 12,000 MT will be used as raw material for Distillery.</li> <li>3. Boiler ash- 441 MT will be mixed with Pressmud and used as raw material for composting.</li> <li>4. ETP Sludge-12 MT will be mixed Pressmud mud and used for compost.</li> <li>5. Lime sludge -12 MT will be used for landfill.</li> <li>6. Used Oil-0.5 KLPA will hand over to KSPCB authorized recyclers.</li> </ol>
5	<p>The project proposal was considered by SEAC during the meeting held on 29<sup>th</sup> December 2017 and got recommended for issue of ToR. The SEIAA considered the proposal during the meeting held on 9<sup>th</sup> February 2018 and decided to issue ToR for conducting EIA study accordingly ToR was issued on 26<sup>th</sup> March 2018 for conducting Environment Impact Assessment (EIA) study in accordance with EAI notification 2006. The EIA has been conducted by M/s.Samrakshan, F-4 I Floor, Swastik Manandi Arcade, S C Road, Sheshadripuram, Bengaluru-560 020. In respect to whom the notification dated 3.3.2016 of the MOE&amp;CC stand deferred as per the order of the Hon'ble High court of Karnataka dated 24-03-2017 in W.P.No.12624-12625/2017. The public Hearing was held on 16<sup>th</sup> November 2018.The Final EIA report has been submitted vide letter dated 19<sup>th</sup> February-2019</p>	Noted.
6	<p>Based on the information submitted by you and presentation made by Environmental consultant, M/s. Samrakshan , F-4 I Floor, Swastik Manandi Arcade, S C Road, Sheshadripuram, Bengaluru-560 020, the State Level Expert Appraisal Committee (SEAC) examined the proposal in the meeting held on 27<sup>th</sup> March 2019 and has recommended for issue of Environmental Clearance.</p>	Noted.
7	<p>The SEIAA Karnataka after due consideration of the relevant documents submitted by the project proponent,</p>	Noted and will be complied following terms and conditions.

	additional clarification furnished in response to its observations and the recommendation of the SEAC have in its meeting held on 4 <sup>th</sup> May 2019 in accordance with the provisions of Environment Clearance under the provisions of Environmental Impact Assessment Notification-2006 and its subsequent amendments, subject to strict compliance of the following terms and conditions.	
<b><u>I.Statutory Compliance</u></b>		
i	The project proponent shall obtain forest clearance under the provisions of Forest ( Conservation) Act, 1986, in case of the diversion of forest land for non-forest purpose involved in the project	NA. Proposed project will be carried in existing sugar plant setup .
ii	The project proponent shall obtain clearance from the National Board for Wildlife, if applicable.	NA
iii	The project proponent shall prepare a Site-Specific Conservation plan & Wildlife Management Plan and approved by the Chief Wildlife Warden. The recommendations of the approved Site-Specific Conservation Plan/ Wildlife Management Plan shall be implemented in consultation with the State Forest Department. The implementation report shall be furnished along with the six-monthly compliance report. (in case of the presence of scheduled -I species in the study area.)	NA
iv	The project proponent shall obtain Consent to Establish / Operate under the provisions of Air ( Prevention & Control of pollution ) Act, 1981 and the Water (Prevention & Control of Pollution) Act, 1974 from the concerned State pollution Control Board / Committee .	We are applied for CFE and CFO will be obtained from Karnataka State Pollution Control Board under the provisions of Air ( Prevention & Control of pollution ) Act, 1981 and the Water (Prevention & Control of Pollution) Act, 1974.  Now, application is applied for CFE-Exp and application N No. 84201 dated 11.07.19.
v	The project proponent shall obtain authorization under the Hazardous and other Waste Management Rules, 2016 as amended from time to time.	Authorization for Hazardous waste is obtained under Hazardous and other Waste Management Rules, 2016. Authorization No: 308393 Validity-30 <sup>th</sup> June 2021
vi	The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MS1HC) Rules, 1989 as amended time to time. All transportation of Hazardous	NA, only hazardous waste used oil is generated and will be hand over to KSPCB authorized recyclers.

	Chemicals shall be as per the Motor Vehicle Act (MVA), 1989.	
<b>II. Air quality Monitoring &amp; Preservation</b>		
i	The project proponent shall install 24X7 continuous emission monitoring system at process stacks to monitor stack emission with respect to standards prescribed in Environment (Protection) Rules 1986 and connected to SPCB and CPCB online servers and calibrate these system from time to time according to equipment supplier specification through labs recognized under Environment (Protection) Act, 1986 or NABL accredited laboratories.	Already continuous online emission and effluent Monitoring System are provided for flue gas emission and treated effluent for ETP and these are connected to CPCB server. The systems are being calibrated time to time.
ii	The project proponent shall install system carryout to Ambient Air Quality monitoring for common/ criterion parameters relevant to the main pollutants released (e.g. PM10 and PM25 in reference to PM emission, and SO2 and NOx in reference to SO2 Nox emissions within and outside the plant area at least at four locations (one within and three outside the plant area at an angle of 120 each), covering upwind and downwind directions. (Case to basis small plants Manual; Large plants: Continuous).	AAQM is carried from empanelled laboratory for pollutants are PM <sub>10</sub> , PM <sub>2.5</sub> , SO <sub>2</sub> and NOx.
iii	The project proponent shall submit monthly summary report of continuous stack emission and air quality monitoring and results of manual stack monitoring and manual monitoring of air quality / fugitive emissions to Regional Office of MoEF&CC, Zonal office of CPCB and Regional Office of SPCB along with six-monthly monitoring report	Stack Emission and Ambient Air Quality monitoring reports and six monthly monitoring are regularly submitted to Regional Office, MoEF & CC and Regional Office of SPCB
iv	Appropriate Air Pollution Control (APC) system shall be provided for all the dust generating points including fugitive dust from all vulnerable sources, so as to comply prescribed stack emission and fugitive emission standards.	ESP is provided for 100 TPH & 50 TPH Boilers and wet Scrubber is provided for 44 TPH and 26 TPH Boilers. Fugitive emission is control by proving mechanical water sprinkling arrangement at Bagasse and Ash handling systems as well as storage yards
v	The National Ambient Air Quality Emission standards issued by the Ministry vide G.S.R.No.826 (E) dated 16 <sup>th</sup> November, 2009 shall be complied with.	Noted, will be
vi	Sulphur content should not exceed 0.5% in the coal for use in coal fired boilers to control particulate emissions within permissible limits (as applicable)., The gaseous emissions shall be dispersed through stack of adequate	Bagasse is used as main fuel for Boilers & 15% coal is used as a auxiliary fuel. Coal having sulfur content less than .0.5% is used.

	height as per CPCB/SPCB guidelines.	
vii	The DG Sets shall be Equipped with suitable pollution control devices and the adequate stack height so that the emissions are in conformity with the extant regulations and the guidelines in this regard	Acoustic enclosures are provided for DG Sets and Stack height provided as per KSPCB consent.
viii	Storage of raw materials, coal etc shall be either stored in silos or in covered areas to prevent dust pollution and other fugitive emissions	Sugar cane raw material for Sugar plant is not stored. It is used directly for manufacturing of sugar. Bagasse is also used directly to Boilers as fuel which is generated during cane crushing. Only small qty of excess Bagasse generated which stored in Bagasse yard and mechanical water sprinkling arrangement provided to control fugitive emission.

### **III. Water Quality Monitoring & Preservation**

i	For online continuous monitoring of effluent, the unit shall install web camera with vision capability and flow meters in the channel/drain carrying effluent within the premises (applicable in case of the projects achieving ZLD) and connected to SPCB and CPCB online servers.	Already Continuous Online Effluent Monitoring System is provided for treated effluent for ETP. and Web camera with and flow meter are provided to Distillery compost yard and spentwash pipeline respectively. These are connected to CPCB server and systems are being calibrated time to time.
ii	Zero Liquid Discharge shall be ensured and no waste/treated water shall be discharged outside the premises (applicable in case of the projects achieving the ZLD).	ZLD is not applicable for Sugar and Co-generation plant. The treated effluent is being utilized for Green belt development, Gardening and on land irrigation.
iii	Process effluent/any waste-water shall not be allowed to mix with storm water. The storm water from the premises shall be collected and discharged through a separate conveyance system.	The separate storm water management for compost yard is provided.
iv	The effluent discharge shall conform to the standards prescribed under the Environment (Protection) Rules, 1986, or as specified by the State Pollution Control Board while granting consent under the Air/water Act, whichever is more stringent.	The generated effluent is being treated in ETP and discharge the treated effluent as per consent granting norms.
v	Total fresh water requirement shall not exceed the proposed quantity or as specified by the Committee. Prior permission shall be obtained from the concerned regulatory authority/CGWA in this regard	NOC is obtained from Irrigation Dept for lifting the water from river and will not exceed the proposed qty 230 KLD
vi	Industrial/trade effluent shall be segregated into High COD/TDS and Low COD/TDS effluent streams. High	The low COD and TDS effluent generated from existing and proposed sugar plant

	TDS/COD shall be passed through stripper followed by MEE and ATFD (agitated thin film drier).Low TDS effluent stream shall be treated in ETP and then passed through RO system.	and Cogeneration plant. This will be treated in existing ETP.
vii	The Company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and utilize the same for different industrial operations within the plant.	Rain water harvesting will be provided roof top
<b>IV. Noise Monitoring &amp; Prevention</b>		
i	Acoustic enclosure shall be provided to DG set for controlling the noise pollution.	Acoustic enclosures are provided for DG Sets
ii	The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation	Ambient Noise level is monitoring from empanelled laboratory. Acoustic enclosure, silencers are provided to DG sets
iii	The ambient noise levels should conform to the standards prescribed under E(P)A Rules, 1986 viz. 75 dB(A) during day time and 70 dB(A) during night time	Ambient Noise Level is monitored and Noise level are within the norms.
<b>V Energy Conservation Measures</b>		
i	The energy sources for lighting purposes shall preferably be LED based.	LED bulbs are installed to street lamps. However in offices, inside industry and colony houses will be installed LED bulbs.
<b><u>VI. Waste Management</u></b>		
i	Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm and the solvent transfer through pumps.	NA. Hazardous waste used oil collected in leak proof barrels and stored at Hazardous storage area.
ii	Process organic residue and spent carbon, if any, shall be sent to cement industries. ETP sludge, process inorganic & evaporation salt shall be disposed off to the TSDF	Process organic residue and sent carbon are not generated ETP sludge is having no any toxic or heavy metals. This sludge is having good organic manure. Therefore it is mixed with press mud and used for manufacturing of Bio-compost.
iii	The company shall undertake waste minimization measures as below	
a	Metering and control of quantities of active ingredients	Sugar industry waste is easily

	to minimize waste	decomposable organic in nature. Waste generated like Bagasse, Boiler ash, Pressmud, molasses, ETP sludge is again reused for making other products like power, Bio- compost and Ethanol
b	Reuse of by-products from the process as raw materials or as raw material substitutes in other processes	By-product generated during sugar manufacture like Bagasse, Pressmud and Molasses is used for Power generation, production of Bio-compost and Ethanol respectively
c	Use of automated filling to minimize spillage.	
d	Use of Close Feed system into batch reactors	NA
E	Venting equipment through vapor recovery system.	Noted and will be provided.
f	Use of high pressure hoses for equipment clearing to reduce wastewater generation.	The high pressure hose pipes are used for cleaning and sugar condensate water is used.

### **VII.Green Belt**

i	Green belt shall be developed in an area equal to 33% of the plant area with a native tree species in accordance with CPCB guidelines .The green belt shall inter -alia cover the entire periphery of the plant	Green belt is developed 35.44%. However, every year plantation activity is taking during monsoon period.
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### **VIII.Safety, Public hearing and Human health issues**

i	Emergency preparedness plan based on the Hazard indemnification and Risk Assessment (HIRA) and Disaster Management plan shall be implemented.	Noted
ii	The PP shall provide Personal Protection Equipment (PPE) as per the norms of Factory Act.	PPE is provided to all employees as well as labors as per factory act norms.
iii	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.	Safety training are conducting regularly with Labor officer & External Safety faculty and periodical medical checkup is conducting by internal as well as external agency.
iv	Provision shall be made for the housing of construction labor within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile STP, safe drinking water, medical health care, crèche etc. The housing may be in the form of temporary	Well constructed Housing colony is provided for all Officers, workers and labors.



	structures to be removed after the completion of the project	
v	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	As per factory act conducting health check up camp quarterly
vi	There shall be adequate space inside the plant premises earmarked for parking of vehicles for raw materials and finished products, and no parking to be allowed outside on public places	Separate vehicle parking station is provided into inside the factory premises
<b><u>IX. Corporate Environment Responsibility</u></b>		
i	The project proponent shall Comply with the provision contained in OM vide F .No 22*65/2017-IA .III dated 1 <sup>st</sup> May 2018 of the ministry of Environment forest and climate change as applicable regarding Corporate Environmental Responsibility and shall be execute the action plan With a total Cost of Minimum of Rs .50 lakhs as substituted vide letter no dated 01/06/2019, around the project site	Noted and will be executed plan which is submitted vide latter dated 01/06/2019 under CER .
ii	The company shall have a well laid down environmental policy duly approve by board of directors .The environmental policy should prescribe for standard operating procedures to have proper checks and balances and bring into focus any infringements /deviation/violation of the environmental /forest /wildlife norms/conditions .The Company shall have System of reporting infringements /deviation/violation of the environmental /forest /wildlife norms /conditions and /or share holders /stake holders .The Copy of the board resolution in this regard shall be submitted to the MoEF /&CC as per the part of six-monthly Report	The Environmental Policy is formed by duly approved by Board of directors.
iii	A separate environmental cell both at the project and company head quarter level ,with qualified personnel shall be set up under the control of senior executive ,who will directly to the head of the organization	A separate Environmental cell is already exists.
iv	Action plan for Implementing EMP and environmental conditions and shall be duly approved by competent authority. The year wise funds earmarked for environmental protection measures shall be kept in	Separate fund is allocated to EMP and will be kept fund in separate account.

	separate account and not to diverted for any other purposes .Year wise programs of implementation of action plan shall be reported to the Ministry /Regional office along with six monthly Compliance report	
v	Self Environmental Audit shall be conducted annually .Every three years third party environment audit shall be carried out	Noted and will be conduct self Environmental audit and also third party once in three year.
<b><u>X. Miscellaneous</u></b>		
i	The project proponent shall make public the environmental clearance granted for their project along with environmental conditions and safeguards ar their cost by prominently advertising it at least in two local newspapers of the district or State of which one shall be in the vernacular language within seven days and in addition this shall also be displayed in the project proponents website permanently .	Obtain of Environmental Clearance is published in Vijayawani & Deccan Herald News paper and The EC Copy is uploaded in Our Website at <a href="http://www.renukasugas.com">www.renukasugas.com</a>
ii	The copies of the environmental clearance shall be submitted by the projects proponents to the the head of local bodies ,Panchayats and municipal bodies in addition to to the relevant offices of the government who in turn has to display the same for 30 days the date of receipt	The Copies of Environmental Clearance submitted to local bodies at Municipal office Munoli and Regional office, KSPCB.
iii	The project proponent shall upload the status of compliance of the stipulated environment clearance conditions ,including results of monitored data on their website and update the same on half yearly basis	The half year compliance report uploaded on our website.
iv	The project proponents shall monitor the criteria pollutants level namely PM10, SO2, Nox ( Ambient levels as well as stack emissions ) Or critical sectoral parameters ,indicated for for the project s and display the same at convenient locations for disclose to the public and put on the website of the company	Stack emission and AAQM is being displayed at factory main date front side.
v	The project proponent shall submit six monthly reports on the status of the compliance of stipulated environmental conditions on the on the website of Ministry of environment ,forest and climate change at environmental clearances Portal	Noted and will be followed.

vi	The project proponent shall submit the environmental statement for each financial year in form -V to the concerned State Pollution Control Board as Prescribed under the Environment( Protection)Rules, 1986 as amended subsequently and put on the website of the company	Environmental Statement for each financial year submitted to Regional Office Belgaum every year before 5 <sup>th</sup> Sept.
vii	The project proponent shall inform the Regional office as well as the Ministry ,the date of financial closure and final approval of the project by the concerned authorities ,commencing the land development work and start of production operation by the project	Noted and will be informed to the Regional office, as well as Ministry.
viii	The project authorities must strictly adhere to the stipulations made by the State Pollution Control Board and State Government	Noted and agreed
ix	The project proponent shall abide by all the commitments recommendations made in EIA /EMP report ,commitment made during public hearing and also that during their presentation to the Expert Appraisal Committee	Noted and agreed
x	No further expansion or Modifications in the plant shall be carried out without prior approval of the Ministry of Environment ,Forest and Climate Change (MoEF& CC)	Noted
xi	Concealing factual data or submission of false /fabricated data may result in revocation of this environmental clearance and attract action under the provisions of the (Protection ) Act ,1986	Noted.
xii	The Ministry may Revoke or suspend the clearance ,if implementation of any of the above conditions is not satisfactory	Noted
xiii	The Ministry Reserves the right to stipulate additional conditions if found necessary .The company in a time	Noted

	bound manner shall implement these conditions	
xiv	The regional office of this Ministry shall monitor compliance of the stipulated conditions .The project authorities should extend full co operation to the officers by the furnishing the requisite data /information's /monitoring reports	Noted and will be co-operate during officers visit
xv	The above conditions shall be en forced inter -alia the provisions of the water (Presentations & Control of Pollution ) Act 1974 ,The Air (Prevention & Control of the pollution ) Act, 1981 ,the environment (protection ) Act ,1986, Hazardous and Other Wastes (Management & Trans-boundary Movement ) Rules,2016 and the public Liability insurance Act ,1991 along with their amendments and Rules and any other orders passed by the Hone,able Supreme Court of India /High Courts and any other court of Law relating to the subject matter	Noted
xvi	Any Appeal against This EC shall lie with the National Green Tribunal ,if preferred ,within a period of 30 days as prescribed under section 16 of National Green Tribunal Act 2010	Noted
<b><u>XI. Specific Conditions</u></b>		
i	The project Authorities shall comply with the suggestions /recommendations made by Regional office of MOeF on the report of compliance dated 18.03.2019	Noted and will be complied.