



Seshasayee Paper and Boards Limited

Regd Office & Works : Pallipalayam, Namakkal District,
Erode - 638 007, Tamilnadu, India. Ph : 91 - 4288 - 240221 to 240228,
Fax : 91-4288-240229 email : edoff@spbltd.com Web : www.spbltd.com
CIN : L21012TZ1960PLC000364

Ref: Env/ W-1/ 438

2024.10.18

The Director(s)
Regional Office (South Eastern Zone)
Ministry of Environment, Forests & Climate Change (MOEFCC)
Government of India
The Handloom Export Promotion Council Building
34 (Old No.18) Cathedral Garden Road
Nungambakkam
Chennai 600 034

Dear Sir,

Sub: Compliance Report for the period April 2024 - September 2024

Ref: Environmental Clearance F.No J-11011/56/95-IA-II (I) dated 21.05.1996

**Environmental Clearance F.No J-11011/194/2013-IA II (I) dated 22.01.2016
and Amendment dated 18.11.2019**

We submit the Compliance Report for the various conditions stipulated in the above Environmental Clearances dated 21.05.1996, 22.01.2016 and 18.11.2019 (amended) respectively, issued by your esteemed Ministry, for the period April 2024 - September 2024, together with relevant enclosures.

Thanking you,

Yours faithfully
For Seshasayee Paper and Boards Limited

GANESH BALAKRISHNA BHADTI
Director (Operations)

Encl: As above



SESHASAYEE PAPER AND BOARDS LIMITED

**PALLIPALAYAM, CAUVERY R.S. P.O
ERODE 638 007, NAMAKKAL DISTRICT**

Unit: Erode



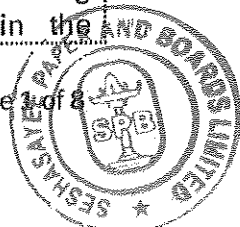
***Compliance Report for the Period
April 2024 - September 2024***

SESHASAYEE PAPER AND BOARDS LIMITED

Environment Clearance F.No. J-11011/56/95 -IA- II (I) dated 21.05.1996

COMPLIANCE REPORT FOR THE PERIOD April 2024- Septemb 2024

SI.No	EC Condition	Compliance Status
1	The Project Authority must strictly adhere to the stipulations made by the State Pollution Control Board and the State Government	<ul style="list-style-type: none"> We strictly adhere to the stipulations made by the State Pollution Control Board and the State Government. <p>Status: Complied</p>
2	No expansion or modification of the plant should be carried out without prior approval of this Ministry	<p>SPB mill abide with this condition.</p> <p>No further expansion or modifications in the plant were carried out without prior approval of the MoEF& CC.</p>
3	Gaseous and Particulate Emissions from various processes should conform to the standards prescribed by the competent authority from time to time. At no time, the emission levels should go beyond the prescribed standards. In the event of failure of any Pollution Control System adopted by the units, the respective unit should be put out of operation immediately and should not be restarted until the pollution control measures are rectified to achieve the desired efficiency.	<ul style="list-style-type: none"> Monitoring of gaseous emissions and particulate matter from various process units was carried out through Environmental Laboratory, TNPCB twice in a year. The monitored data shows that the values are within the standards. In addition to the above, gaseous and particulate emissions are also continuously monitored online round-the-clock basis. Industry has installed online stack monitoring system in all the stacks and stack emissions are well within the standards prescribed. The Advanced Environmental Laboratory, TNPCB, Salem conducts AAQ/Stack Survey twice in a year and their analysis reports confirm compliance of stipulated standards. The report is enclosed as Annexure -1. In the event of any pollution control system failure, the unit will be put out of operation immediately and restarted after achieving the desired values. <p>Status: Complied</p>
4	At least four ambient air quality monitoring stations should be established in the downward direction as well as where maximum ground level concentration of SPM, SO2 and NOx are anticipated. The selection of the AAQ monitoring stations should be based on modelling	<ul style="list-style-type: none"> Industry has established Ambient Air Quality Monitoring Stations in the periphery and being continuously monitored at four locations. The report is enclosed (Annexure-2) Stack Emissions are monitored online 24x7 and transmitted to SPCB/CPCB. Ambient Air Quality Monitoring Stations have been set up in the



exercise to represent short term ground level concentration, sensitive targets etc in consultation with the State Pollution Control Board
 Stack Emissions should also be regularly monitored by installing stack monitoring device in consultation with the State Pollution Control Board
 Data on AAQ and Stack Emissions should be submitted regularly to the Ministry once in six months and the State Pollution Control Board once in three months along with the statistical analysis and interpretation

downwind direction as well as in upwind directions where maximum ground level concentrations are anticipated in consultation with SPCB.

- Monitoring of ambient air quality was carried out on half -yearly basis through Environmental Laboratory, TNPCB AEL Salem. The monitored data shows that the values are within the limits.
- Industry has installed online stack monitoring system in all the stacks and stack emissions are well within the standards prescribed. The Advanced Environmental Laboratory, TNPCB, Salem is conducting AAQ/Stack Survey twice in a year and their analysis reports confirm compliance with stipulated standards in this regard. The report is enclosed **(Annexure 1)**

- Statistical analysis as below
July -24 I Bi-Annual Report

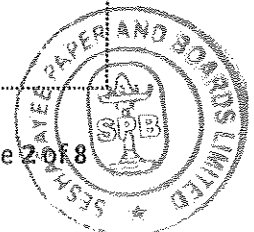
Ref: TNPCB, AEL Salem

Unit	mg/Nm ³	kg/Nm ³ /day
PM		
CPP	27	127.33
Chemical Recovery	43	58.39
Lime Kiln	37	12.66
SO ₂		
CPP	51.2	241.46
Chemical Recovery	22	29.88
Lime Kiln	19.2	6.57
NO _x		
CPP	44	207.50
Chemical Recovery	48.2	65.46
Lime Kiln	23.6	8.08
H ₂ S		
CRP	3.72	5.05
LK	1.88	0.64

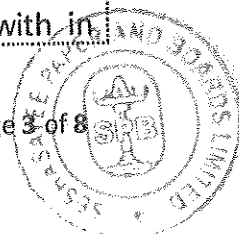
Extract from Advanced Environmental Laboratory Analysis Report, Tamil Nadu Pollution Control Board, Salem.

Industry has submitted data on AAQ and Stack Emissions regularly to the RO, MoEF&CC along with six monthly compliance report, and to TNPCB once in three months.

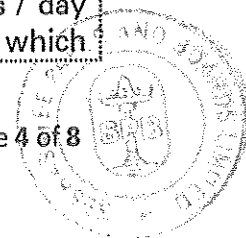
Status: **Complied**



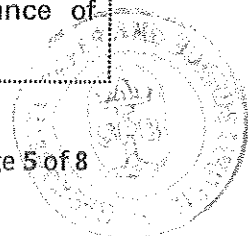
Sl.No	EC Condition	Compliance Status
5	Interlocking facilities should be provided in the ESP's installed in the process equipments and Captive Power Plant so that the plant automatically shuts down in case of ESP failure/emissions exceeding the limits if any	<ul style="list-style-type: none"> • Interlocking facilities have been provided in the ESP's installed in the process equipment and Captive Power Plant. <p>Status: Complied</p>
6	Fugitive emissions should be controlled, regularly monitored and data recorded	<ul style="list-style-type: none"> • Sprinkler systems are in place to mitigate the fugitive emissions. • The raw materials storage area was covered with a shed (Limestone, fuel storage). • We have installed water sprinklers and tanker mounted trailer with sprinkling arrangements to control the same. Photos are enclosed (Annexure -3) • Additional green belt have developed in the boundaries to contain fugitive emissions. • Monitoring of fugitive emissions in the work zone, environment, product and raw materials storage area were regularly carried out. <p>Status: Complied</p>
7	Liquid wastes should be reduced in both volume and concentrations by a combination of in plant control measures and better work practices. Liquid Effluents coming out of the plant and township should conform to the Standards as prescribed by the State Pollution Control Board/ Central Pollution Control Board under the Environment (Protection) Act, 1986.	<ul style="list-style-type: none"> • Volume of liquid effluent is reduced by adapting recycling in various plants of the mill and the specific water consumption is reduced. • The treated effluent and township wastewater are regularly monitored by the Tamil Nadu Pollution Control Board / Central Pollution Control Board which is monitored online and conforming to standards. <p>Status: Complied</p>
8	Recycling and reuse of the treated waste water should be maximized to the extent possible including its use for irrigation purposes. Adequate storm water drains should be provided for avoiding flooding during monsoon period	<ul style="list-style-type: none"> • Various in plant water recycling and conservation measures have been implemented and specific water consumption has been reduced. • Wastewater from paper machines – about 11000m³/day is recycled, treated in Clari-flocculator and reused with in



	<p>the mill.</p> <ul style="list-style-type: none"> • The final treated effluent is used for irrigation after maximized recycling. • About 40% of pre-treated wastewater is recycled in the process under water conservation - report enclosed as Annexure - 4. • Adequate storm water drains were provided to avoid flooding during the monsoon period. <p>Status: Complied</p>																					
9	<p>Adequate number of influent and effluent quality (pH, BOD, COD, TSS) monitoring stations should be set up in consultation with Tamil Nadu Pollution Control Board. Monitored data along with the statistical analysis and interpretation in the form of a report should be submitted to this Ministry on a half yearly basis and to SPCB once in three months.</p> <ul style="list-style-type: none"> • Adequate number of influent and effluent quality monitoring stations was set up in consultation with the Tamil Nadu Pollution Control Board and the reports are submitted to the ministry on half yearly basis and to SPCB once in three months. • Monitored data along with statistical details as below. <table border="1"> <thead> <tr> <th>Parameters</th> <th>Kg/t</th> <th>ppm</th> </tr> </thead> <tbody> <tr> <td>TSS</td> <td>0.61</td> <td>14.67</td> </tr> <tr> <td>TDS</td> <td>52.68</td> <td>1261</td> </tr> <tr> <td>Chlorides</td> <td>13.23</td> <td>318.3</td> </tr> <tr> <td>Sulphates</td> <td>15.27</td> <td>362</td> </tr> <tr> <td>BOD</td> <td>0.30</td> <td>7.3</td> </tr> <tr> <td>COD</td> <td>3.5</td> <td>85.3</td> </tr> </tbody> </table> <p>Extract from the Analysis Report of Advanced Environmental Laboratory, Tamil Nadu Pollution Control Board, Salem (for the period Apr 24 Jun 2024).</p> <p>Status: Complied</p>	Parameters	Kg/t	ppm	TSS	0.61	14.67	TDS	52.68	1261	Chlorides	13.23	318.3	Sulphates	15.27	362	BOD	0.30	7.3	COD	3.5	85.3
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10	<p>The project proponent should take measures to monitor the Cauvery river water quality in the upstream and downstream sides on a regular basis through an independent agency who should report results directly to the SPCB.</p> <ul style="list-style-type: none"> • Monitoring of Cauvery water upstream and downstream was carried out. It is done regularly through in-house as well as through NABEL-accredited laboratories. • Copy of our River Water Analysis - report enclosed in Annexure - 5). <p>Status: Complied</p>																					
11	<p>Chemical Recovery Plant should be set up for recovering the chemical from the Black Liquor to the maximum extent possible</p> <ul style="list-style-type: none"> • Industry has installed Chemical Recovery Plant with 250 TPH water evaporation plant and 950 tonnes / day Chemical Recovery Boiler with which 																					



		they are able to recover the chemicals and reused back in pulp process. Status: Complied
Sl.No	EC Condition	Compliance Status
12	The effluent from the bleaching section should be segregated from other waste water streams and treated for decolourisation. The feasibility of using only Hydrogen Peroxide instead of Calcium Hypochlorite as a bleaching agent for the bleaching of Bagasse pulp should be considered and a report submitted to the Ministry for review. A limit of 150 cubic meters of effluent per MT of paper should be adhered to	<ul style="list-style-type: none"> • Industry has Installed ECF Bleaching System for Bagasse Pulping thereby eliminating the use of Calcium hypochlorite and by replacing the same with Hydrogen Peroxide. • At present treated wastewater discharged is around 40 m³/ton of paper. Status: Complied
13	Organic Matter from Black Liquor and pith removed from the Bagasse should be used as a fuel in the Soda Recovery and Power Boiler	<ul style="list-style-type: none"> • Black Liquor from the Bagasse Pulp Mill is evaporated and used in the Chemical Recovery Boiler for White Liquor Production and Power Production. Pith is used as a fuel in the Captive Power Boiler. Status: Complied
14	The hazardous wastes should be handled as per the Hazardous Waste (Management and Handling) Rules, 1989 and (Hazardous Substance Import, Manufacture and Storage), Rules 1989 of the Environment Protection Act 1986	<ul style="list-style-type: none"> • SPB has obtained Hazardous Wastes Authorization No. 22HFC36355066 dated 07/07/2022 issued by TNPCB with a validity of five years from the date of issue and the Hazardous wastes are disposed as per authorization only. Status: Complied
15	Adequate measures for the control of noise should be taken so as to keep the noise levels below 85 dBA in the work environment. Persons working near the noisy machines in the different units, blowers, compressors etc should be provided with a well designed ear muffs/plugs. Besides, measures should be taken to reduce the noise at the sources itself by employing Engineering methods	<ul style="list-style-type: none"> • Noise control measures such as Silencers, Hoods, etc have been installed in the Power Plant and other noisy areas. Personal Protective Equipment such as ear muffs/plugs have been provided to all the employees. • Monitoring of Ambient Noise level is being carried out on half yearly basis though Advanced Environmental Laboratory, TNPCB, Salem and their analysis report confirm compliance of stipulated standards.



Plant area	75 dBA
Near River Bed	54.7
Coal yard area	54.8
Bagasse Zone Area	54.9
Time office gate	54.8

Extracted from Analysis Report of Advanced Environmental Lab, TNPCB, Salem for the period April 24 - Set 24 (TNPCB survey has been conducted on 19 07 2024 & 20 07 2024)

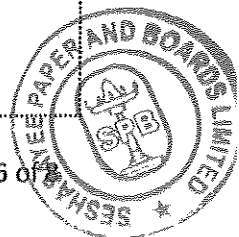
Status: Complied

16 A community welfare scheme for improving the Socio Economic Environment should also be worked out and report submitted to this Ministry for review within a period of 6 months

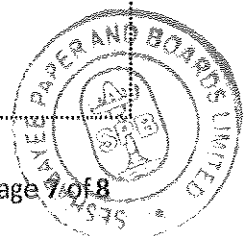
The following community welfare schemes for improving the Socio-Economic Environment have been implemented and Industry has submitted reports regularly to the RO, MoEF&CC along with six monthly compliance report.

- Supply of protected potable drinking water to all the villages and neighbouring community through network of pipelines 400 numbers of drinking water taps were installed in strategic places.
- Supply of treated wastewater after meeting inland surface water discharge standards for irrigation.
- Desilting of community check dams for collection of rain water during monsoon for the recharge of ground water.
- Education facility for the rural community in three schools run by the Company
- Donated land for the Government school Running of Community Health Centres for the benefit of the downtrodden.
- Regular sports activities like Cricket, Tennis, Volleyball, Kabaddi, Shuttle etc are carried out to improve the skills of the rural folk.
- Contribution to supply of drinking water to nearby villages as a cost of Rs; 63.11 lakh (April 24- Sep 24)
- Contribution to disaster management, including Covid relief fund, rehabilitation and reconstruction activity.

Status - Complied



17	An action plan for utilisation of fly ash and lime sludge from Hypo plant should be prepared and a report to be submitted to this Ministry for review within a period of six months	<ul style="list-style-type: none"> • SPB has prepared an action plan and submitted for the fly ash disposal (Annexure 6 a) • Industry has installed a limekiln for burning the lime sludge and reuse in the process. Lime sludge /mud generated from Limekiln has been sent to the cement industry for processing. • Fly ash is sent to the fly ash brick manufacturing unit. Action plan prepared and sent to Ministry (Annexure 6 b) • No Hypo process for bleaching since the installation of RDH pulping (ECF bleaching in 2010 under MDP II). <p>Status: Complied</p>
18	Soil samples from the land fill site, lignite handling area and area irrigated by the treated effluent should be regularly analysed for any signs of soil degradation and if required corrective action should be promptly taken	<ul style="list-style-type: none"> • Monitoring of Soil samples of areas irrigated by the treated effluent is regularly monitored by Tamil Nadu Agricultural University, Coimbatore. Test reports are enclosed as Annexure - 7. <p>Status: Complied</p>
19	Ground water around the land fill site, lignite handling area and areas irrigated by treated effluent should be regularly monitored and report submitted to the SPCB once in three months and to the Ministry and its Regional Office at Bangalore every six months	<ul style="list-style-type: none"> • Monitoring the groundwater quality of existing wells and piezometers in and around the site through TNAU / TNPCB / in-house / for all four seasons of the year and data collected are submitted to the to MoEF&CC and Regional Office • Biannual Report enclosed as Annexure- 8(i), (ii), (iii), • The ground water quality of existing wells and piezometers water quality report were submitted regularly. <p>Status: Complied</p>
Sl.No	EC Condition	Compliance Status
General Conditions		
1	The ministry or any other competent authority may stipulate any additional conditions, if required from Environmental angle after review of monitoring reports or any other report prepared by the Project Authority	Till date, no additional conditions have arisen. In future, if so, the same will be complied



2	<p>The ministry may revoke Environmental Clearance if implementation of any of the conditions is not found satisfactory. The stipulated conditions will be monitored by this Ministry as also by its Regional Office located at Bangalore. Six monthly status reports on the compliance of above conditions should be sent to the ministry (Regional Office, Banaglore).</p>	<p>Till date, no additional conditions have arisen. In future, if so, the same will be complied</p> <p>SPB has submitted six monthly compliance report along with monitored data to Regional office, MoEF &CC, Chennai regularly.</p>
3	<p>The above conditions will be enforced interalia under the provisions, of the Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution), Act 1981; the Environment Protection Act 1986; and the Public Liability Insurance Act 1991 with their amendments and Rules.</p>	<p>Till date, no additional conditions have arisen. In future, if so, the same will be complied</p>

