



E.I.D. Parry (India) Limited

Nellikuppam, Cuddalore District, Tamil Nadu - 607 105.

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To:

20.12.2024

Ministry of Environment Forest & Climate Change,
Regional Office,
Additional Office Block for GPOA, 1st Floor,
Shastri Bhawan, Haddows Road,
Nungambakkam,
Chennai-600006.

Dear Sir,

Sub: E.I.D. Parry (India) Limited, Nellikuppam- Distillery Division-EC Compliance report-reg.

Ref:

1. Environment Clearance F.No-J-11011/233/2008-IA-II(I) Date 23.08.2023
2. Environment and Forests (EC-3) Letter GO(2D)No:28 Dt: 03.03.2016
3. Ministry Letter No: F.No.J-11011/233/2008-1A II(1) Dt. 15.06.2015
4. Ministry Letter No: F.No.J-11011/233/2008-1A II(1) Dt. 09.07.2008

With reference to Environmental clearance granted by MoEF&CC to our Nellikuppam Distillery Unit. We hereby attached the compliance report along with all relevant documents.

This is for your kind perusal please.

Thanking You.

Yours faithfully,

For E.I.D. parry (India) Limited-Distillery Division,


Authorized Signature

S No	Specific Conditions	Status
1	As per the Notification S.O. 2339(E), dated 16th June, 2021, project falls in category B2 and the proposed expansion of 110 KLPD shall only be used for fuel ethanol manufacturing as per self-certification in form of a notarized affidavit by the Project Proponent. Provided that subsequently if it is found that the ethanol, produced based on the EC granted as per this dispensation, is not being used completely for EBP Programme, or if ethanol is not being produced, or if the said distillery is not fulfilling the requirements based on which the project has been appraised as category B2 project, the EC shall stand cancelled.	As we have committed in the application, we will follow the guide lines and will produce Ethanol under the category of B2.
2	Capacity of distillery shall not exceed 200 KLPD at any point of time.	We assured that we will not exceed the Distillery capacity beyond 200 KLPD at any point of time
3	The company shall comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, and risk mitigation measures relating to the project shall be implemented.	We assured that we shall comply all the environmental protection measurements and safe guards proposed in the documents submitted to the Ministry
4	EC granted for a project on the basis of the submitted documents shall become invalid in case the actual land for the project site turns out to be different from the land considered at the time of appraisal of project. Conversion of land use (CLU) certificate shall be obtained before start of construction activities.	The project will happen in our proposed land only, as we considered during the appraisal of the project.
5	NOC from the Concerned Local authority shall be obtained before start of the construction of plant and drawing water from borewells for the integrated sugar and distillery project. State Pollution Control Board shall not issue the Consent to Operate (CTO) under Air (Prevention and Control of Pollution) Act and Water (Prevention and Control of Pollution) Act till the project proponent shall obtain such permission.	Agreed and we will follow the guidelines.
6	Total water requirement shall not exceed 2225 KLPD which will be met from recycled water from Process (1618 KLD) & Sugar CPU Plant (602 KLD). No fresh water shall be sourced from surface/ground water for Industrial purposes. However, freshwater requirement for domestic purpose will be 5 KLD, which will be extracted from borewells. No ground water recharge shall be permitted within the premises. Industry shall construct a rainwater storage pond of 60 days capacity and the accumulated water to be used as fresh water thereby reducing freshwater consumption.	We assured that we will not draw any fresh water apart from the 5 KLPD, which is for domestic usage. We have constructed enough rain water harvesting pits in our premises to recharge the ground water during the rainy season
7	The spent wash from molasses-based distillery shall be concentrated in MEE and concentrated spent wash shall be incinerated in the incineration boiler. Spent Wash/stillage from grain-based distillery shall be sent to the decanter followed by the Multiple Effect Evaporator and dryer to form DDGS. DDGS to be used as cattle feed. Other lean effluents Spent lees, MEE Condensates and utility effluents shall be treated in the condensate polishing unit (CPU) comprising of three stage RO. No wastewater or treated water from integrated unit of sugar mill and distillery shall be discharged outside the premises and Zero Liquid Discharge shall be maintained for all the units namely sugar, Distillery and Cogen Power Plant. STP shall be installed to treat sewage generated from factory premises. PP shall install air cooled condenser in sugar unit to reduce freshwater requirement.	DDGS is not applicable, since the process raw material is not Grain and it is syrup or B Hy Molasses only. The spent wash from the molasses-based distillery will be concentrated in MEE and concentrated spent wash will be incinerated in the incineration boiler. The Condensate generated from the MEE is treated in the CPU plant and thereby it is recycled in the process. We assured that we will not discharge any treated water from Distillery unit into outside premises.

8	Adequate numbers of ground water quality monitoring stations by providing piezometers around the project area shall be set up. Sampling and trend analysis monitoring must be conducted on monthly basis and report submitted to SPCB and RO, MOEFCC. The ground water quality monitoring for pH, BOD, COD, Chloride, Sulphate and Total Dissolve Solids shall be monitored and report submitted to the Ministry's Regional Office.	We provided Piezometric bore well around the project area. TNPCB monitoring and collecting the sample.
9	APCE Electrostatic Precipitator with a stack of height 55 m is installed with the existing biogas fired boilers (6 TPH & 16 TPH) for controlling the particulate matter emissions within the statutory limit of 50 mg/Nm ³ . APCE Bag house/Electrostatic Precipitator with a stack of height 90 m shall be installed for controlling the particulate matter emissions within the statutory limit of 30 mg/Nm ³ from the proposed 45 TPH coal fired boiler. SO ₂ and NO _x emissions shall be less than 100 mg/Nm ³ . At no time, the emission levels shall exceed the prescribed standards. In the event of failure of any pollution control system adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiency. Performance assessment of pollution control devices/ systems will be conducted annually.	The Mentioned line content is not applicable, since our Biogas boiler operation will be totally decommissioned after the expansion. By aiming at 30 mg/Nm ³ emission level, unit has opted though it is high cost, APCE of suitable Bag filter with stack of height of 60 meters will be installed. Project is not installed ESP since achieving 30 mg/Nm ³ with ESP is challenging one view of maintenance work.
10	As informed by PP, no Bio composting shall be used for the existing /proposed distillery.	We have already decommissioned the Bio-Composting activity during 2016 itself and we assured that after the expansion also, we will not carry out any Bio-composting activity
11	23 TPD Bagasse Boiler ash shall be generated and will be sold to brick manufacturer/ Mixed with press mud and used as manure. PP shall use Bagasse as fuel for the proposed boiler. Low sulphur coal with maximum sulphur content of 0.5% shall only be used. PP shall meet 15% of the total power requirement from solar power by generating power inside plant premises/adjacent/nearby areas.	The generated boiler ash of 23 TPD will be enriched with potash content and we are planning to convert into granular form to sold as potash rich fertilizer in the market as per GOI directions
12	CO ₂ (68 TPD) generated during the fermentation process is being/will be collected by utilizing CO ₂ scrubbers and sold to authorized vendors/collected in proposed bottling plant.	We will collect the generated CO ₂ of 68 TPD in the process as in the form of liquid CO ₂ and going to be sold in the market
13	PP shall allocate at least Rs. 2.0 Crore for Occupational Health Safety. Occupational Health Centre for surveillance of the worker's health shall be set up. The health data shall be used in deploying the duties of the workers. All workers & employees shall be provided with required safety kits/mask for personal protection.	We assure that we will allocate Rs 2.0 Cr towards Occupational Health Safety, in view of workers health surveillance and provide required personal safety protection for the workers and employees
14	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Safety and visual reality training shall be provided to employees.	We assured that we will provide the training schedule for all the employees
15	The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire fighting system shall be as per the norms. PESO certificate shall be obtained. 20. Location of ethanol storage tanks shall be placed in such a way that in the event of any fire, accident, explosion or any unforeseen conditions the impact of such event should not go beyond the boundary of the plant i.e. the risk should be tolerable (acceptable) at the boundary.	We have obtained PESO certificate for the handling & storing of Ethanol, in view of any fire, accident, explosion or any unforeseen conditions
16	Process organic residue and spent carbon, if any, shall be sent to Cement and other suitable industries for its incinerations. ETP sludge, process inorganic & evaporation salt shall be disposed of to the TSDF.	Not applicable
17	The company shall undertake waste minimization measures as below (a) Metering and control of quantities of active ingredients to minimize waste; (b) Reuse of by-products from the process as raw	a. All the inputs and out puts were measured through flow meters. In our plant, the generated waste is belongs organic category which is Yeast Sludge being

	<p>materials or as raw material substitutes in other processes. (c) Use of automated filling to minimize spillage. (d) Use of Close Feed system into batch reactors. (e) Venting equipment through vapour recovery system. (f) Use of high pressure hoses for equipment clearing to reduce wastewater generation.</p>	<p>generated from Fermentation and ETP sludge being generated in the Bio-digester, sent to our R& D farms as a manure cum soil enricher. b. One of our by-products is CO₂, which is generated in the Fermentation, which is liquefied and sent for industrial and beverage use. Another by-product is potash rich fertilizer, which is obtained from the final effluent and sent to farmers as fertilizer c. Automated filling system are provided in the molasses filling of fermentation section and there by spillage of material is avoided d. All raw materials and all product transferring is carried out by pipeline through closed loop system to the end respective end use. e. In the plant, all the products are condensed through second condenser apart from the main condenser and thereby vapour escaping is avoided f. We use hydro jet equipment for process equipment cleaning and multi-effect evaporator tube cleaning and in which very minimal quantity of water being used and there by cleaning water usage is minimized.</p>
18	<p>The green belt of at least 5-10 m width shall be developed in nearly 3.0 hectares i.e., 33 % of the total project area with tree density @ 2500 trees per hectares, mainly along the plant periphery. Indigenous species shall only be developed as part of greenbelt and non-indigenous / alien species shall be replaced with native species. No invasive or alien or non-native tree species shall be selected for plantation. PP shall develop at least 20 variety of species as a part of greenbelt. Saplings 4-6 feet high shall be planted. Selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department and native species shall be developed. Records of tree canopy shall be monitored through remote sensing map. Greenbelt development shall be completed before commissioning of the plant. PP shall develop additional 30 meters thick green belt towards village Nellikuppam in North and towards Municipal hospital, school, church and other religious places in NE and S directions.</p>	<p>We are maintaining the Green Belt in & around the premises as per the CPCB norms. We have further developing around 1.5 hec behind to our project area, greenery development with native species as per the board directions.</p>
19	<p>PP proposed to allocate Rs. 3.75 Crores towards Extended EMP (CER) which shall be spent as submitted in CER plan. Further, all the proposed activities under CER shall be completed before the commissioning of the plant in consultation with District Administration.</p>	<p>We developed 6 no of Kurunkadu's for 45 acres with native species trees as prescribed by the CPCB norms. We are planning for CER activity and the same will be processed in phased manner.</p>
20	<p>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. Out of the total project area, 15% shall be allotted solely for parking purposes with facilities like rest rooms etc.</p>	<p>Separate earmarked Vehicle parking is available.</p>
21	<p>Storage of raw materials shall be either in silos or in covered areas to prevent dust pollution and other fugitive emissions. All stockpiles should be constructed over impervious soil and garland drains with catch pits to trap runoff material shall be provided. Biomass shall be stored in covered sheds and wind breaking walls/curtains shall be provided around biomass storage area to prevent its suspension during high wind speed. All Internal roads shall be paved. Industrial</p>	<p>The Raw Materials like Molasses and B Hy Molasses are stored in mild Steel tank with closed condition. Similarly, the fuel of bagasse, are stored in yard by barricaded and also covering with cladding sheet arrangement.</p>

	vacuum cleaner shall be provided to sweep the internal roads. The Air Pollution Control System shall be interlocked with process plant/machinery for shutdown in case of operational failure of Air Pollution Control Equipment.	
22	Continuous online (24x7) monitoring system for stack emissions/effluent shall be installed for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB server. For online continuous monitoring of effluent, the unit shall install web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises.	We have provided a continuous online monitoring system for stack emission / Effluent parameters and it is being connected to CPCB and SPCB server
23	A separate Environmental Management Cell (having qualified person with Environmental Science/ Environmental Engineering/specialization in the project area) equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions. EMC head shall report directly to Head of Organization/ Director/CEO as per company hierarchy.	Separate Environmental management cell is available
24	PP shall sensitize and create awareness among the people working within the project area as well as its surrounding area on the ban of Single Use Plastic in order to ensure the compliance of Notification published by MOEFCC on 12th August, 2021. A report along with photographs on the measures taken shall also be included in the sixmonthly compliance report being submitted to concerned	We have conducted an awareness program for single-use plastics for employees
S No	General Conditions	Status
1	No further expansion or modifications in the plant, other than mentioned in the EIA Notification, 2006 and its amendments, shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change/SEIAA, as applicable. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry/SEIAA, as applicable, to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.	We assure that we will not go for further expansion or modifications in the plant without prior approval of the MoEF&CC.
2	The energy source for lighting purpose shall be preferably LED based, or advanced having preference in energy conservation and environment betterment.	We have already implemented the conversion of all the lights to LED. We prioritize energy conservation and improving the environment.
3	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. The ambient noise levels shall conform to the standards prescribed under the Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).	We are maintaining the ambient noise level is well within the limit.
4	The company shall undertake all relevant measures for improving the socioeconomic conditions of the surrounding area. CER activities shall be undertaken by involving local villages and administration and shall be implemented. The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.	We have taken various CER activities involving the local villagers and administration to improve their socio-economic conditions. We have created a green belt on 42 acres of land in Eidanur under the Kurungadu project.
5	The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein.	We assure that we will provide the sufficient funds towards capital cost and recurring cost to implement the conditions given by MoEF&CC as well as state government. We affirmed that the fund allotted for Environmental management and pollution control will

	The funds so earmarked for environment management/ pollution control measures shall not be diverted for any other purpose.	not be diverted any other purpose.
6	A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zilla Parishad/ Municipal Corporation, Urban local Body and the local NGO, if any, from whom suggestions/ representations, if any, were received while processing the proposal.	Public hearing is not required for us.
7	The project proponent shall also submit six monthly reports on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF&CC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six-monthly compliance status report shall be posted on the website of the company.	We assure that we will send the reports on the status of the implementation of the environmental protection measures along with the six month reports to Zonal office of MoEF&CC, CPCB and TNPCB.
8	The environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Regional Offices of MoEF&CC by email.	We are regularly submitting Form-V to the State Pollution Control Board.
9	The project authorities 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 and the date of start of the project.	We will inform the particulars of project details to the concerned office and for our existing distillery unit having valid consent for manufacturing Ethanol. The expansion is proposed for supplying Ethanol to IOCL under B2 Category.
10	This Environmental clearance is granted subject to final outcome of Hon'ble Supreme Court of India, Hon'ble High Court, Hon'ble NGT and any other Court of Law, if any, as may be applicable to this project.	Noted, we will abide by the law

E.I.D PARRY (INDIA) LIMITED,NELLIKUPPAM ENVIRONMENT CLEARANCE Dt:03.03.2016

S.No	Conditions	Status
1	The Unit shall ensure that it shall not exceed consented quantity of products in the change in product mix activity	We ensured always could not exceed the consented quantity of products in the change in product mix activity
2	The Unit shall ensure that it shall not exceed consented quantity of sewage and trade effluent in the change in product mix activity	No changes in the trade effluent quantity in the change in product mix activity
3	The unit shall not treat and dispose the sewage through septic tank and chock pit arrangement	Combined with Our sugar ZLD effluent treatment system
4	The unit shall provide RO plant followed by integrated evaporation system after biomenthanisation to reduce effluent quantity from 720KLD to 160KLD and reduce quantity of trade effluent is mixed with press mud sent to cement industries as fuel grinding aid as proposed	We are continuously operating RO plant, Integrated evaporator and Dryer and to achieve zero discharge and the permeate and condensate is recycled back to molasses dilution and cooling tower make up purpose - As per Consent condition direction
5	The unit shall utilize the biogas only for the boiler as fuel and other fuel shall be utilized the prior approval of the board	Our Distillery Thermax boiler fuel used only for biogas generating from our bio - digester
6	Consent should be updated	Every year Month of Feb Renewal Application upload
7	Any other condition to be specified by the Tamil Nadu Pollution Control Board in the interest of Pollution Prevention and Environment Protection and control	Complied

E.I.D PARRY (INDIA) LIMITED,NELLIKUPPAM ENVIRONMENT CLEARANCE Dt:15.06.2015.

SNo	Conditions	Status
1	After biomethanation treated spent wash shall be passed through RO plant followed by MEE, ATFD and Drum dryer. The dried spent wash powder (95 % TS) will be sold as potash fertilizer. Permeate water, condensate water will be treated in condensate polishing unit Treated condensate effluent will be recycled / reused to process and cooling towers, Distillery will be operated for 365 days.	After biomethanation treated spent wash passed through RO plant followed by MEE and ATFD . The dried spent wash powder (95 % TS) sold as potash fertilizer. Permeate water, condensate water treated in condensate polishing unit and reused to process and cooling towers .
2	Permeate water, condensate water will be treated in condensate polishing unit ,Treated condensate effluent will be recycled / reused to process and cooling towers makeup and process.	Complied. All the permeate and condensate water treated in the condensate polishing unit and reused to fermenter filling and cooling tower makeup
3	No effluent shall be discharged outside the plant premises and Zero effluent discharge condition shall be implemented.	We have operated the plant with art of technology and adopted 100% zero liquid discharge system. No effluent discharged outside the factory premises.
4	Company shall install continuous monitoring system (24*7 monitoring devices) for flow measurement and relevant pollutants in the treatment system. The data to be made available to the respective SPCB and in the company's website.	Continuous online monitoring system for monitoring the effluent generation and treated effluent quantity. The monitored results are connected online to the SPCB and CPCB.
5	Company shall ensure the quality and marketability of potash fertilizer produced by standard labelling such as " AGMARK"etc	We have obtained the whole sale license from Department of Agricultural for the dried spent wash powder as a potash fertilizer.
6	In the event of failure of any effluent treatment system adopted by the unit the distillery plant shall not be restarted unit the control measures are rectified to achieve the desired efficiency.	In case of any failure in the effluent treatment system, we assure to stop the distillery operations
7	All other conditions will remain unchanged.	We will comply with all conditions
8	You are requested to keep this letter with the Environmental Clearance accorded vide letter No. 11011/233/2008-IA II (I) dated 9th July,2008	We will keep this letter.
9	In future, in case of change in the scope of the project, the company shall obtain fresh Environmental Clearance.	If there is a change in the scope of the project, we assure that we will get a new environmental clearance.
10	This issue with the prior approval of the Competent Authority.	Complied

E.I.D PARRY (INDIA) LIMITED,NELLIKUPPAM ENVIRONMENT CLEARANCE dated 09.07.2008

SNo	Conditions	Status
1	The industry shall ensure that the treated effluent and stack emissions from the unit are within the norms stipulated under the Environment (Protection) Act, 1986 rules or SPCB whichever is more stringent. In case of process disturbance/failure of pollution control equipment adopted by the unit , the respective unit shall be shut down and shall not be restarted until the control measures are rectified to achieve the desired efficiency.	We assure that we maintain treated effluent and emission parameters well within the prescribed norms.
2	The emissions from the 6 TPH and 4 TPH gas fired boilers shall be controlled by provision of stack of heights 30m . The stack height as per the CPCB standards/ guidelines for dispersion of SPM emissions.	we have installed stack height as per CPCB guidelines
3	The distillery unit based on Molasses based process shall operate for 300 days only and it shall not operate during rainy season	The distillery is not operated during rainy season as per the instructions of the Board
4	The spent wash generated (742 m3/day) after bio methanation shall be composted with press mud. No effluent shall be discharged outside the factory premises and zero discharge shall be strictly followed. Land and other requirements for treatment of spent wash with press mud shall be as per the CPCB guidelines. An area of 9.9 ha shall be earmarked separately for spent wash storage lagoon, press mud storage and bio compost storage etc. The compost yard shall be made impervious as per the CPCB guidelines.	The spent wash is treated in two bio digesters. Biomethanated waste is treated in R.O followed by IEE, MEE & ATFD. The dried spent wash powder sold as potash fertilizer. We have achieved zero liquid discharge system. No effluent is discharged outside the premises.
5	The spent wash shall be stored in impervious pucca lagoons. The spent wash lagoons shall have proper lining with HDPD and shall be kept in proper condition to prevent ground water pollution. As per the CPCB recommendation, storage shall not exceed 30 days capacity.	The spent wash storage tanks are impervious and provide with HDPD lining as per the CPCB norms. The total spent wash storage capacity is not exceeding 30 days capacity.
6	Green belt in 33% of the plant area shall be provided to mitigate the effects of fugitive emissions all around the plant and compost yard as per the CPCB guidelines in consultation with the local DFO	We are maintaining the green belt inside and outside premises as per the CPCB guidelines.
7	Permission shall be obtained from the state ground water Board/Central Ground Water Authority to draw ground water	We obtained No objection Certificate for drawl of ground water from Government of TamilNadu Water Resources Department.
8	Company shall adopt rainwater harvesting measures to recharge the ground water.	Rain water harvesting system has been provided in all the buildings inside the factory and in the residential quarters
9	Occupational health surveillance programme shall be undertaken as regular exercise for all the employees. The first aid facilities in the occupational health centre shall be strengthened and the medical records of each employee shall be maintained	There is a full-fledged occupational health center with qualified medical professionals. Health surveillance programs are regularly undertaken and records are maintained