

1. EIA Violation :

As per the data collected from the records of KSPCB, the following are the consented quantities to be manufactured by the company.

Consent period	Date of application	Production as per application form (MTPA)	Consented quantity by KSPCB (MTPA)	Actual production (MTPA)
1994-95	31.5.94	69,000	69,000	82,300
1995-96	30.3.95	69,000	69,000	88,250
1996-97	29.4.96	69,000	69,000	1,12,300
1997-98	24.6.97	85,500	85,500	1,11,375
1998-99	Not Available	Not available	85,500	Not available

It could be seen from the above table after EIA Notification is enacted in 1994 the company started producing more than the consented quantity. Regrettably, KSPCB too has not taken any objection for this increase in production without getting their NOC/CFE. It is interesting to note that the company kept on establishing various facilities after 1994 and applied for CFE to the Board from time to time. They have been issued consent for establishment by KSPCB on 26.8.1996 for 16,500 TPA of duplex board with an investment of 18.8 crores. Project authorities have also applied for CFE in 1997 for a DG set of capacity 4x1 MW each with an investment of 4.25 crores. Again they changed and obtained the consent for establishment on 8.6.98 for establishing DG set of 1x4 MW with an investment of 8 crores. Again they have applied for consent for establishment to Board to establish DG set of capacity 1x1.25 MW and 4 units of capacity of 0.125 MW in the year 1999. Recently, M/s. West Coast Paper Mills have applied for consent for establishment for increasing the production to 163,000 TPA from 119750 TPA. However, Board took objection for that application since the original consented quantity is only 85500 tons has been increased to 119750 without approval of KSPCB. The company has resubmitted their application stating phase I as 85,500 to 119750 TPA and Phase II as 119750 to 163750 TPA, with an investment of Rs. 49.21 crores and Rs. 210.79 crores respectively. Moreover during the undersigned inspection on 5th May, 2003 it is understood the project authorities have already started construction of a co-generation plant which utilize 9000 TPA coal with an investment of 24 crores. The consent for establishment for this co-generation plant has not been given so far by KSPCB.

The consent for establishment in respect of the expansion from 85,500 to 163750 TPA is issued by KSPCB on 6.4.2002 based on the EIA report submitted to KSPCB for expansion from 119750 to 163750 TPA! Since the production of the expanded capacity was started without upgrading the ETP it

has resulted in increased pollution and a show cause notice was issued by KSPCB on 24.8.2002 and the company has replied the show cause notice on 3.9.2002. Based on the reply and to decide on the consent for operation applied by the company for the expanded capacity it was decided by KSPCB Technical Advisory Committee on 27.9.2002 to send a sub committee to visit the industry. The sub committee has visited the industry on 18.2.2003 and submitted a report on 22.3.2003. The following are the observations of the the committee.

- (a) Enhancement of ETP has not been initiated so far though the company started producing the enhanced quantity.
- (b) The replacement of the clarifloculator has been suggested by TAC.
- (c) The sewage treatment plant of colony has not been upgraded to activated sludge process.
- (d) The sludge disposal is unscientific.
- (e) Fly ash Utilization is not being done by the company.
- (f) Vent scrubber to the chlorine emission is not established as it is not technically feasible.
- (g) Noise levels are higher than the limits.

Based on their visit, the sub committee has recommended to KSPCB not to issue CPQ for increased production unless the company complies with all the conditions given in consent for establishment on 6.4.2002. Interestingly the Member Secretary, KSPCB has sent a letter to Secretary, MoEF vide KSPCB letter No.KSPCB/WPC/West Coast/TC/17 category/2002-2003 dated 17.7.2002 stating that there is no increase in pollution load by expanding the unit from 85,500 to 163750 TPA. It is unclear how this conclusion is arrived by KSPCB when EIA is prepared by the company is for expanding from 119750 to 163750 TPA. The pollution load with respect to increasing the production from 85,500 to 119750 TPA is never discussed in that EIA report.

It is clear from the above that M/S West Coast Paper Mills have increased their production from 85500 TPA to 163750 TPA violating the EIA Notification, 1994 without justifying on the no increase in pollution load for this increased production. In addition to this increase in production, project authorities have also established DG sets to supplement the power requirement of the operations from time to time stating the investment is less than Rs. 50 crores. Looking at this scenario it is strongly recommended M/s. West Coast Paper Mills, Dandeli may be issued directions under E (P) Act, not to enhance the production from 85,500 till the approval from MoEF is obtained under EIA Notification, 1994 and E(P) Act, 1986.

Page Break

2. Pollution due to the operations of M/s. West Coast Paper Mills :

On perusal of the information available with the State Pollution Control Board for the last 1 ½ year it is observed the company was never meeting the standards prescribed with respect to BOD, COD and suspended solids. The details as per the data provided by KSPCB are as below:

Month of sampling	Suspended solids	BOD	COD
9/01	110	61	361
10/01	216	80	392
12/01	42	31.2	107.4
2/02	312	123	249
3/02	120	79.5	259
4/02	62	15.6	111.9
5/02	174	66	306
6/02	916	121	748
7/02	88	91.5	563
9/02	28	79	423
10/02	84	43	418
11/02	144	90	518
12/02	88	57	249
1/03	94	109	500
2/03	86	66	224

While issuing the consent KSPCB has prescribed the standard of pH 5.5 to 9 and suspended solids 100 mg/l whereas the E(P) Act standards for large pulp and paper mills is pH 7 to 8.5 and suspended solids 50 mg/l. This amount to dilution of E (P) Act standards by KSPCB which is against Rule 3 of E (P) Rules,

1986. If we look at the above tabulation even this diluted standard is not met by the company most of the times.

Based on the complaint from the local people regarding the pollution, CPCB, Zonal Office has conducted a survey on 22nd to 24th Jan, 2003 and found that most of the parameters are not met by the project authorities and the capacity of ETP is inadequate to handle BOD and suspended solids load after expansion. The effluent quantity measured was 110000 M³/day where as the consented quantity by KSPCB is 64,000 M³/day. CPCB has also indicated that the color of the effluent should be brought down to the extent possible. CPCB is also of the opinion unless the up-gradation of ETP is completed any further expansion by M/s. West Coast Paper Mills is not desirable. The report submitted by CPCB, ZO, Bangalore to MS, CPCB on 19.2.2003 indicate there should be a minimum flow in Kali River for better dilution of the effluent and DO levels at the discharge point.

3. Dumping of fly ash in forest areas :

During the discussions it is understood that the fly ash generated from the FBC boiler is being dumped by M/s. West Coast Paper Mills in the reserve forest area in the abandoned mines without getting approval under F(C) Act, 1980. It is understood that the State Government has issued orders vide their order No. AHFF/31/FFM/91/Bangalore dated 13.9.1991 for utilizing these abandoned mines situated in SB 24 of Pradhani Section in Virnoli Range of Haliyal Division in an area of 3 ha. for dumping of the fly ash. They have also made an application to State Government recently for continuing the dumping in identified new abandoned mining areas in the reserve forest which is under consideration. Since the dumping of the fly ash in the forest area is a non forest activity which compulsorily requires approval under F(C) Act, 1980 State Government may be apprised about this requirement and ask them to withdraw orders issued till such time the proposal is approved by MoEF, Government of India, under F(C) Act, 1980.

4. Clear felling of trees for erecting the new effluent treatment plant :

During the discussions it is understood the entire area on which the West Coast Paper Mills is built is a forest area originally which has been leased to the company. No details of the duration of the lease, extent of the lease etc. are available. During the inspection it is observed clear felling of the trees has been undertaken by M/s. West Coast Paper Mills for erecting the new expanded ETP. It is not clear whether this requires any approval under F(C) Act, 1980. This issue need to be deliberated and project authorities may be advised on the further course of action.

MoEF Report

1. EIA Violation:

As per the data collected from the records of KSPCB, the following are the consented quantities to be manufactured by the company.

Consent Period	Date of application	Production as per application (MTPA)	Consent quantity by KSPCB (MTPA)	Actual production (MTPA)
1994-95	31.5.94.	69,000	69,000	82,300
1995-96	30.3.95	69,000	69,000	88,250
1996-97	29.4.96	69,000	69,000	1,12,300
1997-98	24.6.97	85,500	85,500	1,11,375
1998-99	Not Available	Not Available	85,500	Not Available

It could be seen from above table after EIA Notification is enacted in 1994 the company started producing more than the consented quantity. Regrettably, KSPCB too has not taken any objection for this increase in production without getting their NOC/CFE. It is interesting to note that the company kept on establishing various facilities after 1994 and applied from CFE to the Board from time to time. They have been issued consent for establishment by KSPCB on 26.8.1996 for 16,500 TPA of duplex board with an investment of 18.8 croers. Project authorities have also applied for CFE in 1997 for a DG set of capacity 4x1 MW each with an investment of 4.25 croers. Again they changed and obtained consent for establishment on 8.6.98 for establishing DG set of 1x4 MW with an investment of 8 croers. Again they have applied for consent for establishment to Board to establish DG set of capacity 1x1.25 MW and 4 units of capacity of 0.125 MW in the year 1999. Recently, M/s West Coast Paper Mills have applied for consent for establishment for increasing the production to 163,000 TPA from 119,750 TPA. However, Board took objection for that application since the original consented quantity is only 85,500 tons has been increased to 119,750 without approval of KSPCB. The company has resubmitted their application stating phase I as 85,500 to 119,750 TPA and phase II as 119,750 to 163,750 TPA, with an investment of 49.21 croers and Rs. 210.79 croers respectively. Moreover during the undersigned inspection on 5th May, 2003 it understood the project authorities have already started construction of a co-generation plant which utilizes 9000 TPA coal with an investment of 24 croers. The consent for establishment for this co-generation plant has not been given so far by KSPCB.

The consent for establishment in respect of the expansion from 85,500 to 163,750 TPA is issued by KSPCB on 6.4.2002 based on the EIA report submitted to KSPCB for expansion from 119,750 to 163,750 TPA! Since the production of the expanded capacity was started without upgrading the ETP it has resulted in increased pollution and a show cause notice issued by KSPCB on 24.8.2002 and company has replied the show cause notice on 3.9.2002. Based on the reply and to decide on the consent for operation applied by the company for the expanded capacity it was decided by

KSPCB Technical Advisory Committee to visit the industry. The sub committee has visited the industry on 18.2.2003 and submitted a report on 22.3.2003. the following are the observations of the committee.

- (a) Enhancement of the ETP has not been initiated so far though the company started producing the enchanted quantity.
- (b) The replacement of the clarifloculator has been suggested by TAC.
- (c) The sewage treatment plant of colony has not been upgraded to activated sludge process.
- (d) The sludge disposal is unscientific.
- (e) Fly ash utilization is not being done by the company.
- (f) Vent scrubber to the chlorine emission is not established as it is not technically feasible.
- (g) Noise level are higher than the limits.

Based on visit, the sub committee has recommended to KSPCB not to issue CFO for increased production unless the company complies with all he conditions given in consent for establishment on 6.4.2002. Interestingly the Member Secretary, KSPCB has sent a letter to MoEF vide KSPCB letter No. KSPCB/ WPC/WEST COAST/TC/17 category/ 2002-2003 dated 17.7.2002 stating that there is no increase in pollution load by expanding the unit from 85,500 to 163750 TPA. It is unclear how this conclusion is arrive by KSPCB when EIA is prepared by the company is for expanding from 119750 to 163750 TPA. The pollution load with respect to increasing the production from 85,500 to 119750 TPA is never discussed in that EIA report.

It is clear from the above that M.s. West Coast Paper Mill have increased their production from 85,500 TPA to 153750 TPA violating the EIA NotificatiOn, 1994 without justifying on the no increase in pollution load for this increased production. In addition to this increase in production, project authorities have also established DG sets to supplement of the operations from time to time stating the investment is less than Rs. 50 croers. Looking at this scenario it is strongly recommended M/s. West Coast Paper Mills Dandeli may be issued directions under E(P) Act, not to enhance the production from 85,500 till the approval from MoEF is obtained under EIA Notification, 1994 and E (P) Act, 1986

2. Pollution due to the operations of M/s. West Coast Paper Mill:

On perusal of the information available with the State Pollution Control Board for the last 1 ½ year it is observed the company was never meeting the standards of prescribed with respect to BOD, COD and suspended solids. The details as per the data provided by KSPCB are as bellow:

Month of sampling	Suspended solids	BOD	COD
9/01	110	61	361
10/01	216	80	392
12/01	42	31.2	107.4
2/02	312	123	249
3/02	120	79.5	259
4/02	62	15.6	111.9
5/02	174	66	306
6/02	916	121	748
7/02	88	91.5	563
9/02	28	79	423
10/02	84	43	418
11/02	144	90	518
12/02	88	57	149
1/03	94	109	500
2/03	86	66	224

While issuing the consent KSPCB has prescribed the standees for large pulp and paper mills is pH 7 TO 8.5 and suspended solids 50 mg/l. This amount to dilution of E(P) Act standard by KSPCB which is against Rule 3 OF E(P) Rules,1986. If we look at the above tabulation even this diluted standard is not met by the company most of the times.

Based on the complaint from the local people regarding the pollution, CPCB, Zonal office has conducted a survey on 22nd to 24th Jan , 2003 and found that most of the parameters are not met by the project authorities and the capacity of EPT is inadequate to handle BOD and suspended solids load after expansion. The affluent quantity measured was 110000 M3/day where as the consented quantity by KSPCB is 64,000 M3/day. CPCB has also indicated that the color of the effluent should be brought down to the extent possible. CPCB is also of the opinion unless the upgradation of ETP is completed any further expansion by M/s. West Coast Paper Mill is not desirable. The report submitted by CPCB, ZO, Bangalore to MS, CPCB on 19.2.2003 indicate there should be a minimum flow in Kali River for better dilution of the effluent and DO levels at the discharger point.

3. Dumping of fly ash in forest areas:

During the discussion it is understood that the fly ash generated from the FBC boiler is being dumped by M/s. West Coast Paper Mill in the reserve forest area in the abandoned mines without getting approval under F © Act, 1980. It is understood that the state government has issued orders vide their order No.AHEF/31/FFM/91/Bangalore dated 13.9. 1991 for utilizing those abandoned mines situated in SB 24 of Pradhani Section in Virnoli Range of Haliyal Division in an area of 3 ha. For dumping of the ash. They have also made an application to State Government recently for continuing the dumping in identified new aboadoned mining areas in the reserve forest which is under consideration. Since the dumping of

the fly ash in the forest area is a non forest activity which compulsorily requires approval under F© Act, 1980 state government may be apprised about this requirement and ask them to withdraw orders issued till such time the proposal is approved by MoEF, Government of India, under F (C) Act, 1980.

4. Clear felling of trees for erecting the new effluent treatment plant:

During the discussion it is understood the entire area on which the West Coast Paper Mills is built is a forest area originally which has been leased to the company. No details of the duration of the lease, extent of the lease etc. are available. During the inspection it is observed clear felling of the trees has been undertaken by M/s. West Coast Paper Mills for erecting the new expanded EPT. It is not clear whether this requires any approval under F (C) Act, 1980. This issue need to be deliberated and project authorities may be advised on the further course of action.