



September 6, 2018

CAG's Comments on the Executive Summary, Pre-Feasibility report for proposed for MILL EXPANSION PLAN of TAMIL NADU NEWSPRINT AND PAPERS LIMITED - UNIT II, Mondipatti, Manapparai, Trichy District.

PRE-FEASIBILITY REPORT:

Subject	Issue	Comments
Sl.No Air Environment	1.2.1 Imported coal with sulphur content less than 1% will be utilized.	Clarity in the statement: Project proponent should clearly mention the percentage of sulphur content in the coal. According to that Flue Gas Desulphurization (FGD) is needed or not can be verified. Action suggested: Air pollution measures need to be taken during the design period. According to that, the project proponent should design for plant.
Noise emission	Expected Noise emission outside the cogeneration plant will be around 70 dB (A)	Contradictory statement in Executive summary: Executive summary, Sl. No: 5.6 states that 75 dB (A) can be expected from the source after reduction. Action suggested: If the limit is changed, the reason for the same should be mentioned, which is missing in this case.

Trustees

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<p>Sl.No. Wastewater Discharge</p>	<p>3.8.1 Treated Effluent from ETP will be used for green development.</p> <p>Before MEP Covered 700 acres of land.</p> <p>After MEP 16,000 M3/day will be used in 1100 acres.</p>	<p>Unclear Data:</p> <p>For unit 1 & 2 Green development has been done for 700 acres.</p> <p>After MEP it will be done for 1100 acres.</p> <p>So, the totally area will be 1100 acres or (1100+700) acres remains a question.</p> <p>If it is 1100 acres, as per the calculation: $(16000 \times 1000 \text{ litres/day}) / (1100 \times 2500) \text{ SQM} = 5.8 \text{ liters/SQM/day}$</p> <p>Action suggested: As per MoEF & CC guidelines, an application rate of 35 m3/Hectare/day (which is 3.5 litre/SQM/day) is permitted.</p> <p>The proposed application rate is excessive.</p> <p>1100 acre land is not adequate for Green development & command area for Irrigation.</p> <p>Project proponent needs to increase the green development area & command area for irrigation.</p>
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EXECUTIVE SUMMARY:

<p>3.2.6 <i>Wastewater Treatment and Discharge</i></p>	<p>Green belt development & Irrigation using treated wastewater:</p> <p>Wastewater will be used in "Existing green belt/ green cover/ plantation area is 650 acres, additional 500 acres is proposed to be covered through "contract farming" or "formation of society by the surrounding farmers "</p>	<p>Formal Agreement is needed with Farmer:</p> <p>500 acres of contract farming needs to be done with a formal agreement and with regards to the land type, type of cultivation and peak water demand, no period of water demand and lean period of water demand etc.</p> <p>Action suggested:</p> <p>A detailed discussion with farmer is needed before the agreement. Otherwise the disposal of treated effluent for land irrigation is not practicable.</p> <p>The project proponent has to justify as to how the entire treated wastewater can be utilized for a vast command area, with an application rate commensurate with the cropping pattern of that particular area.</p>
<p>4.3 <i>Water Environment</i></p>	<p>TDS in surface water at various location were found to be in 36 mg/l to 144 mg/l</p>	<p>Drinking water security for the region:</p> <p>Provided TDS is baseline data of river stretch, which is not validated with other available published data.</p> <p>As per BIS standard for public drinking water security, the desirable TDS is 300 mg/l and maximum permissible is 500 mg/l in water.</p> <p>It has to be noted that drinking water has been an issue since the</p>



		<p>start of Unit II plant. During the public hearing for the existing plant in Mondipatti which was held in 2013, a demand was made by the people to provide piped drinking water to neighbouring villages.</p> <p>This was also specified as an EC condition (General Condition O), with the company being asked to provide water to nearby villages. However, the promise has not been fulfilled so far.</p> <p>In the EC compliance report filed by the company in March 2018, it does not mention about supplying water, although other CSR activities have been listed. TNPL claims it is conducting a detailed study to identify the needs of the local public within 5 kms radius of the mill, in consultation with local Panchayat representatives</p> <p>Action suggested:</p> <p>1. EIA report has to explain as to how drinking water within 10 Kms radius of the buffer zone is being protected.</p> <p>If not, then Project proponent needs to undertake protected drinking water supply, as continuous application of treated wastewater with TDS exceeding 500 mg/l will contaminate the groundwater resources (as such problems have already been documented in the vicinity of Pulp & paper Mills).</p>
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<p>4.5 <i>Soil Environment</i></p>	<p>The pH of the soil for 10km radius around the study area was found to be 7.3 to 8.1, which indicating that soil is alkaline.</p>	<p>Soil impact due to use of ETP treated wastewater:</p> <p>The higher pH value clearly indicates the alkalinity of soil which can be due to the use of treated wastewater for green development around plant area.</p> <p>Action suggested: Project proponent needs to check the characteristic of effluent wastewater from ETP before using for irrigation.</p>
<p>5.8 <i>Soil and Ground water Quality Related impacts</i></p>	<p>The highest predicted TDS value was found to be 1000 mg/L in the project site and the lowest predicted value is 750 mg/L near the project site in 10 years.</p>	<p>Groundwater impact:</p> <p>TDS in groundwater is high in the locality.</p> <p>Use of treated wastewater for green development around plant area may be the reason for change in the water's characteristics.</p> <p>Action suggested: Project proponent needs to check the characteristic of effluent wastewater from ETP before using it for irrigation.</p>

Regards
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