



BANK NOTE PAPER MILL INDIA PRIVATE LIMITED

(A JV of SPMCIL - A Govt. of India Enterprise and BRBNMPL - A Subsidiary of RBI)

CIN : U21090KA2010PTC055475

BNPM No. 464 / (S) 02.01.06/2018-19
Dec 01, 2018

The Chief Conservator of Forests (Central),
Ministry of Environment, Forest & climate Change
Regional Office (Southern Zone)
4th Floor, E&F Wings, Kendriya Sadan,
17th Main, II Block, Kormangala,
Bangalore - 560 034

Kind Attn: **Dr. U. Sridharan, Scientist "G" / Director**

Sub: Compliance Report (for the period April 2018 - September 2018)

Dear Sir,

Please find herewith the attached compliance report for the period of April 2018 to September 2018.

This is for your kind information and records.

Yours faithfully,

(K G Viswanathan)
Chief General Manager

Encl:

1. Compliance report
2. Ground water (Sodium levels) checking reports at BNPM - Three monthly
3. Ambient Air & stack monitoring reports (monthly basis) from Apr-18 to Sep-18

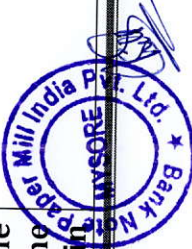
Registered & Corporate Office :

Administration Building, Paper Mill Compound, Note Mudran Nagar, Mysuru-570003.
Phone : 0821-2401 111, Fax : 0821-2581154 Web : www.bnpmindia.com.

MOEF COMPLIANCE REPORT

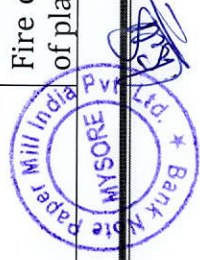
16,000 TPA Bank Note Paper Mill located at village Mudran Nagar, Mysore in Karnataka by M/s. Bank Note Paper Mill (India) Private Limited, - Environmental Clearance under clause 7(ii) of EIA notification 2006 - Approval accorded by MOEF vide Letter No. J-11011/239/2010 IA-II (I) dated May 01, 2018

SI No	Clause No.(EC)	Description	Compliance
1	15 (i)	The greenbelt shall be developed in 13.65 Acres which is equivalent to 33% of the project area. Since 8.5 acres developed in the project premises, the PP shall develop greenbelt in remaining area in the adjoining area of the project. The greenbelt shall be developed with broad leaved and native tree species.	BNPM total land area is 36.216 acres, accordingly 12 acres of land is required to develop as green belt, which is equivalent to 33% of entire BNPM area. BNPM has already developed green belt of area 10 acres within the allotted land. Further development of four acres of greenbelt is going on.
2	15 (ii)	No change in the scope of the project shall be made without prior approval of the ministry.	Noted for compliance
3	15(iii)	All the conditions prescribed in the environmental clearance letter No. F. No. J-11011/239/2010 IA-II (I) dated 29 th April, 2011 shall be strictly complied with.	Point wise compliance to previous environmental clearance is given below
<u>Compliance to Environmental clearance letter No. F. No. J-11011/239/2010 IA-II (I) dated 29th April, 2011</u>			
4	A (i)	Environmental clearance is subject to obtaining clearance under the wildlife (Protection) Act, 1972 from the National Board for Wildlife. Further, grant of environmental clearance does not necessarily implies that wildlife clearance shall be granted to the project and the proposal shall be considered by the National Board for Wildlife on merits. The investment made in the project, if any, based on environmental clearance so granted, in anticipation of clearance from the wildlife angle shall be entirely at the cost and the risk of the company and Ministry of Environment and Forests in	Proposal to accord approval was placed before the Standing Committee of NBWL in the 36 th meeting held on 04.11.2015 for consideration. Committee has recommended our case.

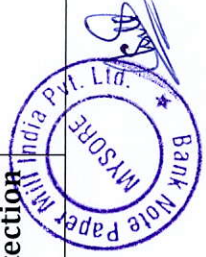


		this regard shall not be responsible in any manner.	
5	A (ii)	Environmental clearance is subject to final order of the Hon'ble Supreme Court of India in the matter of Goa Foundation Vs. Union of India in Writ petition (Civil) no.460 of 2004, as may be applicable to this project.	Noted
6	A (iii)	The project authority should install multi cyclones, wet scrubbers with the boilers to achieve the particulate emission below 50 mg/Nm ³	BNPM has installed oil fired boilers (with world's best burner from M/s. Sackee), hence multi cyclones & wet scrubbers are not required, as particulate emission will be below 50mg/Nm ³ .
7	A (iv)	Lime scrubbing should be done to minimize SO ₂ emissions and Low NO _x burners should be installed.	BNPM has installed oil fired boilers only hence multi cyclones & wet scrubbers are not required, as particulate emission will be below 50mg/Nm ³
8	A (v)	The total water requirement shall not exceed 3,000 KLD. The industry should ensure the compliance of the standards for discharge of the treated effluent from the unit as stipulated under the E (P) Act, rules or SPCB whichever is more stringent. The company should make efforts to limit the water consumption up to 75 m ³ /tonne of product. Adequate steps including use of modern RO/UF based technologies shall be used to increase recycling and reduce water consumption.	The average fresh water consumption is 1700KLD. BNPM has done remarkable work on water conservation by adopting Zero discharge concept & recycling the process water and treated water within the system. The present Specific Fresh water consumption is about 40 m ³ /MT of paper produced against 75 m ³ /tonne of product. UF-RO system and softeners are commissioned & are in operation.
9	A (vi)	Adequate number of influent and effluent quality monitoring stations should be set up in consultation with the State Pollution Control Board and regular monitoring should be carried out for all relevant parameters to maintain the effluent treatment efficiency. The report should be submitted to Ministry's Regional Office at Bangalore, SPCB and CPCB.	Online effluent monitoring system to monitor treated effluent at outlet of ETP to measure Flow, pH, COD, BOD and TSS was commissioned & in operation and reports are being uploaded to CPCB servers.
10	A (vii)	Ground water and soil shall be monitored so as to ensure that there are no excess sodium levels and no adverse effect on vegetation as well as ground water. The company should submit the comprehensive water	Ground water analysis are being carrying out on regular basis for sodium, calcium, Magnesium (Sodium Absorption Ratio -SAR) The treated water is being used for gardening. No

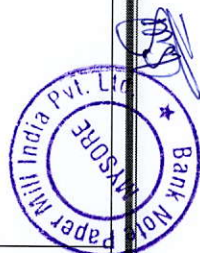
		management plan along with monitoring plan for the ground water quality and the level, within three months from date of issue of this letter.	adverse effect on soil observed. The water management plan has been submitted to KSPCB and consent for operation has been obtained. Copy of the same is enclosed
11	A (viii)	Elemental Chlorine Free (ECF) technology shall be adopted	Elemental Chlorine Free (ECF) technology has been adopted in the process.
12	A (ix)	The project authority should dispose of hazardous waste as per the provision of Hazardous Wastes (Management, Handling and Trans boundary Movement) Rules, 2003.	Consent for handling of hazardous waste has been obtained and hazardous waste shall be disposed as per provisions of Hazardous Wastes (Management, Handling and Trans boundary Movement) Rules, 2016.
13	A (x)	The company should develop green belt in 33% of the total land as per the CPCB guidelines to mitigate the effect of fugitive emissions	This project is being set up within the existing premises of BRBNMPL. BRBNMPL has already developed approx. 130 acres for landscape and plantation out of total 332 acres of land. Thus, we have already complied with the condition. Further, BNPM has also developed green belt of area 10 acres within the allotted land. Further development of 04 acres of green belt is going on.
14	A (xi)	Occupational health surveillance of the workers should be done on a regular basis and records maintained as per the Factories Act.	Company has already established a health centre within the factory premises.
15	A (xii)	The company should make the arrangement for protection of possible fire hazards during manufacturing process in material handling	Full-fledged Fire protection system is in operation (separate electric & diesel pumps of capacity 410 m ³ /hr capacity was commissioned in WTP just to control fire) & fire hydrants are installed throughout the factory Automatic sprinkler type fire extinguishing system is provided for Raw material & finished goods Godown. Further portable type fire extinguishers are installed inside the premises & work areas. Fire detection system is installed in all the buildings of plant.



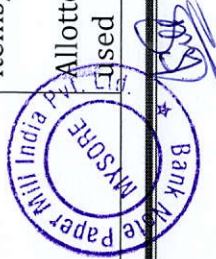
16	A (xiii)	All the recommendations made in the Charter on Corporate Responsibility for Environment Protection (CREP) for the pulp and paper sector should be strictly implemented.	Noted for compliance
17	A (xiv)	At least 5 % of the total cost of the project should be earmarked towards the enterprise social commitment based on Public Hearing & social responsibility and item-wise details along with time bound action plan should be prepared and submitted to the Ministry's Regional Office at Bangalore. Implementation of such program should be ensured accordingly in a time bound manner.	Some of the CSR commitment has already been taken up by the company. Details are given in 30 B(xii)
18	A (xv)	Provision should be made for the housing of construction labour 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 structures to be removed after the completion of the project.	Construction work completed.
19	B (i)	The project authorities must strictly adhere to the stipulations made by the Karnataka Pollution Control Board and the State Government.	Noted for compliance
20	B (ii)	No further expansion or modernization in the plant shall be carried out without prior approval of the Ministry of Environment and Forests. 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 to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any	Noted for compliance




21	B (iii)	One ambient air quality monitoring station shall be installed in downwind direction. Ambient air quality including ambient noise levels shall not exceed the standards stipulated under EPA or by the State authorities. Monitoring of ambient air quality and stack emissions shall be carried out regularly in consultation with KPCB and report submitted to the KPCB quarterly and to the Ministry's Regional Office at Bangalore half-yearly.	As per consent the ambient air quality monitoring is to be done by EP act approved laboratory. In this regard, once in a month ambient air & stack monitoring was conducted by M/s. Bangalore Analytical & Research centre which is a NABL approved lab and reports are submitted to KSPCB (Mysore).
22	B (iv)	In-plant control measures for checking fugitive emissions from all the vulnerable sources like spillage/raw materials/coal handlings etc. shall be provided. Bag filters shall be provided at transfer points and dedusting stacks to control fugitive emissions. Water sprinkling, black topping of internal roads and green belt development shall be carried out to control the fugitive dust emissions due to vehicular movement. Dust suppression and extraction system shall be provided to control secondary fugitive emission during raw material handling and processing.	Black topping of internal roads has been done. Greenery has been developed in all open space. Hydrants & Sprinkler system has been installed in the entire paper mill, campus has been kept very clean & green.
23	B (v)	Proper housekeeping and cleanliness must be maintained within and outside the plant.	Proper housekeeping and cleanliness is being maintained within and outside the plant.
24	B (vi)	The overall noise levels in and around the plant area shall be kept well within the standards (85 dBA) by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels should conform to the standards prescribed under EPA Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).	DG & compressors are provided with acoustic enclosures. As noted ambient noise level are within the limits.
25	B (vii)	The company shall undertake rainwater harvesting measures to recharge the ground water.	Being complied.
26	B (viii)	Occupational health surveillance programme shall be undertaken as regular exercise for all the employees, specially for those engaged in handling hazardous substances. The first aid facilities in the occupational health centre shall be strengthened and the medical	Being Complied



	records of each employee should be maintained separately.	
27	B (ix) The project proponent shall also comply with all the environmental protection measures and safeguards recommended in the EIA/EMP report	Noted & Being complied
28	B (x) The implementation of the project vis-a-vis environmental action plans shall be monitored by Ministry's Regional Office at Bangalore / KPCB / CPCB. A six monthly compliance status report shall be submitted to monitoring agencies	Project is fully commissioned
29	B (xi) Adequate provisions for infrastructure facilities such as water supply, fuel, sanitation etc. shall be ensured for construction workers during the construction phase so as to avoid felling of trees and pollution of water and the surroundings	Construction work completed
30	B (xii) The project proponent shall have a scheme for social upliftment in the surrounding villages with reference to contribution in road construction, education, establishment of health centers, sanitation facilities, drinking water supply, community awareness and employment to local people whenever and wherever possible both for technical and non-technical jobs	<p>Allotted Rs. 10 lakhs for providing computers for girl students (30-40 Nos.) of Maharani Women's College, Mysuru and computers were issued.</p> <p>Allotted Rs. 22 lakhs for Roof-top solar PV system to Administrative Block of Jawahar Navodaya Vidyalaya, DMG Halli, Mysuru</p> <p>Allotted Rs. 22.50 lakhs for installation of Solar Fans to 156 Anganwadis (Dept - Dy. Director of Women & Child Dept., GoK)</p> <p>Allotted Rs. 20 lakhs for Beautification of lawn at Kalamandir, Mysuru, a facility created by Govt. of Karnataka & the works were completed.</p> <p>Allotted Rs. 41.2 lakhs to procure medical items/instruments for M/s. K R Hospital, Mysore</p> <p>Allotted Rs. 8 lakhs to procure Mahindra Bolero to be used as 'Quick Reaction Team (QRT) Vehicle' for</p>



31	B (xiii)	A separate Environmental Management Cell equipped with full-fledged laboratory facilities to carry out the various Environmental Management and Monitoring functions shall be set up under the control of Senior Executive.	District Fire Officer, Mysuru. Allotted Rs. 4.85 lakhs to procure Wheel Chairs & First Aid Kits for Indian Red Cross Society, Mysore Laboratory has been set up and being monitored on regular basis. A senior officer has been made in-charge of the same.
32	B (xiv)	The requisite amount shall be earmarked towards capital cost and recurring cost/annum for implementing environment pollution control measures respectively and used judiciously to implement the conditions stipulated by the Ministry of Environment and Forests as well as the State Government and an implementation schedule for implementing all the conditions stipulated herein. The funds so provided shall not be diverted for any other purposes	Capital expenditure on ETP is approx. 30 cr. Regular operation & maintenance cost including chemicals, is provided as per requirement.
33	B (xv)	The project proponent shall upload the status of compliance of the stipulated environment clearance conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of the MOEF, the respective Zonal Office of CPCB and the SPCB. The criteria pollutant levels namely; RSPM, SO ₂ , NO _x (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the projects shall be monitored and displayed at a convenient location near the main gate of the company in the public domain	Project has been commissioned. Display board as per KSPCB norms, is maintained near main gate All stack emission parameters are well within the limits and installation & commissioning of online stack monitoring system to Boiler chimneys is completed.
34	B (xvi)	The project proponent shall also submit six monthly reports on the status of the compliance of the stipulated environmental conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MOEF, the respective Zonal Office of CPCB and the SPCB. The Regional Office of this Ministry at Bangalore /CPCB/SPCB	Noted for compliance. 

35	B (xvii)	shall monitor the stipulated conditions. The environmental statement for each financial year ending 31 March in Form-V as is mandated to be submitted by the project proponent 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 conditions and shall also be sent to the respective Regional Offices of the MOEF by e-mail	Noted for compliance
36	B (xviii)	The Project Proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB and may also be seen at the Website of the Ministry of Environment and Forests at http://envfor.nic.in . This should be advertised within seven days from the date of issue of the clearance letter at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the Regional office at Bangalore.	Complied. The project has been commissioned and came to operation phase.
37	11	The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.	Noted
38	12	The Ministry reserves the right to stipulate additional conditions if found necessary. The Company in a time bound manner shall implement these conditions.	Noted
39	13	The above conditions shall be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act 1981, the Environment (Protection) Act, 1986, Hazardous Wastes (Management, Handling and Trans boundary Movement) Rules, 2008 and the Public (Insurance) Liability Act, 1991 along with their amendments and rules	Noted

