

GOVERNMENT OF INDIA  
MINISTRY OF ENVIRONMENT, FOREST AND CLIMATE CHANGE

**LOK SABHA**  
**UNSTARRED QUESTION NO. 1611**  
TO BE ANSWERED ON 10.03.2025

**The Water (Prevention and Control of Pollution) Act, 1974**

1611. SHRI RAHUL KASWAN:

Will the Minister of ENVIRONMENT, FOREST AND CLIMATE CHANGE be pleased to state:

- (a) whether the Government has issued any directions to the Punjab Pollution Control Board under Section 18(1)(b) of The Water (Prevention and Control of Pollution) Act, 1974 to submit Action Taken Report thereon; and
- (b) if so, the details thereof?

**ANSWER**

MINISTER OF STATE IN THE MINISTRY OF ENVIRONMENT, FOREST AND CLIMATE CHANGE  
(SHRI KIRTI VARDHAN SINGH)

**(a) & (b):**

The Central Pollution Control Board (CPCB) has issued following directions to the Punjab Pollution Control Board under Section 18(1)(b) of the Water (Prevention and Control of Pollution) Act, 1974:

1. CPCB vide letter dated 12.02.2025 has issued directions under section 18 (1) (b) of the Water (Prevention & Control of Pollution) Act, 1974 and the Air (Prevention & Control of Pollution) Act, 1981, to all SPCBs/PCCs, including Punjab Pollution Control Board (PPCB) for adoption and implementation of Classification of industrial sectors. CPCB has recently revised the methodology for classification of sectors based on pollution potential and published a report titled - "Classification of sectors into Red, Orange, Green, White and Blue Categories". Copy of the same is available at CPCB website (<https://cpcb.nic.in/cpcb-directions.php>). The Action taken Report (ATR) from Punjab Pollution Control Board (PPCB), in this regard, is awaited.

2. CPCB vide letter dated 12.08.2024 issued direction under section 18(1)(b) of the Water (Prevention and Control of Pollution) Act 1974, to PPCB for appropriate actions against the non-complying Common Effluent Treatment Plants (CETPs) to ensure compliance of environmental norms and conditions prescribed by MoEF&CC in Environmental Clearance (EC) issued under Environmental Impact Assessment Notification, 2006. A copy of the CPCB directions dated 12.08.2024 is attached as **Annexure-I**. Subsequently, Action Taken Report has been received

from PPCB indicating that directions had been issued to the non-compliant CETPs for ensuring compliance of discharge condition and prescribed standards. A copy of the ATR received from PPCB is attached as **Annexure-II**.

3. Further, CPCB issued following directions under Section 18(1)(b) of the Water (Prevention and Control of Pollution) Act, 1974 to the PPCB in last five years (FY 2020-21 to 2024-25) with status are given below:

<b>S. No.</b>	<b>Date of issuing</b>	<b>Subject</b>	<b>Status of Action Taken Report</b>
01	12.08.2021	Categorization of Thermal Power Plants as per MoEF&CC notification dated 31.03.2021	Received
02	13.09.2023	Registration and data uploading by Captive Power Plants on Ash portal	Received
03	03.05.2024	For providing compiled mining information regarding mining leases executed	Received
04	14.10.2024	Enforcement of Ash notification, 2021	Yet to be received
05	07.02.2025	Compliance of Hon'ble NGT orders dated 30.04.2024 and 10.01.2025 in O.A. No. 581 of 2022 titled as Vikas Kumar v/s State of Haryana & Ors. regarding permissibility of construction of the temporary bridges across river streams/channels for carrying out mining and allied activities.	Yet to be received

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केन्द्रीय प्रदूषण नियंत्रण बोर्ड  
CENTRAL POLLUTION CONTROL BOARD  
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय, भारत सरकार  
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE, GOVT. OF INDIA

Speed Post

CPCB/IPC-VII/CETP-Ludhiana/ 344

Dated: 12.08.2024

To

**The Member Secretary**  
Punjab Pollution Control Board  
Vatavaran Bhawan, Nabha Road  
Patiala Punjab

**Subject: Directions under section 18(1)(b) of the Water (Prevention and Control of Pollution) Act, 1974 regarding non-compliance status of four CETPs namely A. 40 MLD CETP- near Central Jail, Tajpur Road (Focal Point Module), Ludhiana, Punjab, B. 50 MLD CETP Tajpur-Rahon Road Cluster, Ludhiana, near Central Jail, Tajpur Road, Ludhiana, Punjab, C. 15 MLD CETP- Bahadurke Road, Ludhiana, Punjab and D. 500 KLD CETP, Plot No. D-260-261, Phase-VIII, Focal Point, Ludhiana, Punjab.**

WHEREAS, amongst others, under Section 17 of the Water (Prevention & Control of Pollution) Act, 1974, one of the functions of the State Pollution Control Board (SPCB), (or Pollution Control Committee for Union Territories) constituted under the Water (Prevention & Control of Pollution) Act, 1974 is to plan a comprehensive programme for prevention, control or abatement of pollution of streams and wells located in the State and to secure the execution therefore; and

WHEREAS, amongst others, under Section 16 of the Water (Prevention & Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981, one of the functions of the Central Pollution Control Board (CPCB), constituted under the Water (Prevention & Control of Pollution) Act, 1974 is to coordinate activities of the State Pollution Control Boards and Pollution Control Committees and to provide technical assistance and guidance to SPCBs/PCCs; and

WHEREAS, amongst others, under Section 16 of the Water (Prevention & Control of Pollution) Act, 1974, one of the functions of the Central Pollution Control Board (CPCB), is to promote cleanliness of streams and wells in different areas of the State; and

WHEREAS, the Central Government has notified the standards for discharge of environmental pollutants from various categories of industries, Common Effluent Treatment Plants (CETPs) and Sewage Treatment Plants (STPs) under the Environment (Protection) Act, 1986 and the rules framed there under; and

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**WHEREAS**, there is a need to inculcate the habit of self-monitoring within the CETPs for complying with the prescribed standards and this can be achieved by installing Online Continuous Effluent Monitoring System (OCEMS); and

**WHEREAS**, four CETPs namely (i) CETP - 40 MLD near Central Jail, Tajpur Road (Focal Point Module), Ludhiana, Punjab, (ii) CETP - 50 MLD Tajpur-Rahon Road Cluster, Ludhiana, near Central Jail, Tajpur Road, Ludhiana, Punjab, (iii) CETP - 15 MLD Bahadurke Road, Ludhiana, Punjab and (iv) CETP - 500 KLD CETP, Plot No. D-260-261, Phase-VIII, Focal Point, Ludhiana, Punjab were inspected by CPCB officials along with officials of Punjab PCB during 22.04.2024 and 23.04.2024 based on the communication of the Central Monitoring Committee (CMC) with CPCB. Following major observations were made:

- A. CETP - 40 MLD, near Central Jail, Tajpur Road (Focal Point Module), Ludhiana, Punjab (herein after referred as CETP):**
- I. During the visit on 22.04.2024, the CETP was found operational with the flow rate of 29 MLD. The CETP receives effluent through dedicated underground pipeline and the treatment is based on Sequential Batch Reactor (SBR) technology. It was informed that the CETP is discharging the treated effluent into Budha Nallah (which meets River Sutlej) through underground pipeline from CETP. However, as per the Environmental Clearance (EC) issued by MoEF&CC to the CETP dated 03.05.2013, "the treated wastewater will be used for irrigation" and it is also mentioned in the special terms & conditions that, "*There shall be no discharge into Budha Nallah*".
  - II. The consent under the Air Act, 1981 is valid upto 29.12.2024 and the Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 is valid upto 19.12.2024 for the operation of 40 MLD CETP. However, the consent under the Water Act, 1974 was valid till 15.05.2023. The CETP has applied for renewal of consent to PPCB on 07.09.2023.
  - III. It was reported that 72 Dyeing and Printing units have obtained membership from CETP. It was also informed by the CETP operator that inlet norms for CETP is not prescribed in the consent.
  - IV. Grab samples were collected from the CETP during monitoring. The analysis result of samples collected from CETP outlet reveals that BOD:54 mg/l (Standard: 30 mg/l), COD:262 mg/l (Standard:250 mg/l), Chloride:2284 mg/l (Standard: 1000 mg/l) and Sulphide:2.4 mg/L (Standard: 2 mg/l) exceeds the notified effluent discharge standards for CETP. Remaining monitored parameters are within the prescribed standards.

- V. Grab sample were also collected from the Sequential Batch Reactor (SBR) tank for MLSS & MLVSS. The analysis result reveals that the concentration of MLSS: 4661 mg/l (Designed range: 5000-7000 mg/l) and concentration of MLVSS: 3000 mg/l (Designed range: 3500-4200 mg/l) are less than the designed range, which indicates the poor operation of the SBR.
- VI. The CETP has installed Online Continuous Effluent Monitoring System (OCEMS) at the final outlet of treated effluent for the parameters- pH, TSS, COD, BOD with connectivity to PPCB & CPCB servers. During the visit, the OCEMS was found operational and variation in OCEMS reading compared with the monitored results was also reported which indicates the improper working / validation / calibration of OCEMS system.
- VII. The CETP has provided sludge storage facility and obtained membership from M/s Re-sustainability Limited (M/s Ramky Enviro Engineers Limited). The CETP had disposed 3517.235 MT sludge (as per the log book records) during the year 2023-24.

**B. CETP - 50 MLD, Tajpur-Rahon Road Cluster, Ludhiana, near Central Jail, Tajpur Road, Ludhiana, Punjab.**

- I. During the visit on 22.04.2024, the CETP was found operational with the flow rate of 46 MLD. The CETP receives effluent through dedicated underground pipeline and the treatment is based on Sequential Batch Reactor (SBR) technology. It was informed that as per the consent, the CETP is permitted to discharge the treated effluent into Budha Nallah (which meets River Sutlej) through underground pipeline from CETP. However, as per the EC issued by MoEF&CC to the CETP dated 03.05.2013, "the treated wastewater will be used for irrigation" and it is also mentioned in the special terms & conditions that, "*There shall be no discharge into Budha Nallah*".
- II. The consent under the Air Act, 1981 is valid upto 31.03.2026 for the operation of 50 MLD CETP. However, the Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 was valid till 04.12.2023 and the consent under the Water Act, 1974 was valid till 22.08.2023. The CETP has applied for renewal of consent and authorization to PPCB on 31.08.2023.
- III. It was reported that 110 Dyeing and Printing units have obtained membership from CETP. It was also informed by the CETP operator that inlet norms for CETP is not prescribed in the consent.
- IV. Grab samples were collected from the CETP during monitoring. The analysis result of samples collected from CETP outlet reveals that BOD: 128 mg/l (Standard: 30

mg/l), COD: 382 mg/l (Standard: 250 mg/l) and Chloride: 1713 mg/l (Standard: 1000 mg/l) exceeds the notified effluent discharge standards for CETP. Remaining monitored parameters are within the prescribed standards.

- V. Grab sample were also collected from the Sequential Batch Reactor (SBR) tank for MLSS & MLVSS. The analysis result reveals that the concentration of MLSS: 300 mg/l (Designed value: 5000 mg/l) and concentration of MLVSS: 215 mg/l (Designed value: 4000 mg/l) are less than the designed values, which indicates the poor operation of the SBR.
- VI. The CETP has installed Online Continuous Effluent Monitoring System (OCEMS) at the final outlet of treated wastewater for the parameters- pH, TSS, COD, BOD with connectivity to PPCB & CPCB servers. During the visit, the OCEMS was found operational and variation in OCEMS reading compared with the monitored results was also reported which indicates the improper working / validation / calibration of OCEMS system.
- VII. During the visit, it was observed that the CETP has provided sludge storage facility and obtained membership from M/s Re-sustainability Limited (M/s Ramky Enviro Engineers Limited) for disposal of sludge. The CETP had disposed 1597.20 MT sludge during the year 2023-24 through TSDF and further, as per log book records, about 173 MT was stored in the premises.

### **C. CETP - 15 MLD CETP- Bahadurke Road, Ludhiana, Punjab.**

- I. During the visit on 22.04.2024, the CETP was found operational with the flow rate of 11.26 MLD. The CETP receives effluent through dedicated underground pipeline and the treatment is based on Sequential Batch Reactor (SBR) technology. It was informed that the CETP is discharging the treated effluent into Budha Nallah (which meets River Sutlej) through underground pipeline from the CETP. However, as per EC issued by MoEF&CC on 08.12.2014, the CETP is required to establish a Zero Liquid Discharge system.
- II. The consent under the Air Act, 1981 is valid upto 31.03.2025 for the operation of 15 MLD CETP. However, the consent under the Water Act, 1974 was valid till 04.01.2023 and the Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 was valid till 04.10.2022 for which the CETP has applied for renewal to PPCB.
- III. It was reported that 36 Dyeing/Printing/washing units have obtained membership from CETP and connected to the CETP at the time of visit. It was also informed by the CETP operator that inlet norms for CETP is not prescribed in the consent.

- IV. Grab samples were collected from the CETP during monitoring. The analysis results of sample collected from CETP outlet reveals that BOD: 243 mg/l (Standard: 30 mg/l), COD: 587 mg/l (Standard: 250 mg/l), Chloride: 1904 mg/l (Standard: 1000 mg/l) and Sulphide: 16 mg/l (Standard: 2 mg/l) exceeds the notified effluent discharge standards for CETP. Remaining monitored parameters are within the prescribed standards.
- V. Grab samples were collected from the Sequential Batch Reactor (SBR) tank for MLSS & MLVSS. The sample analysis results reveals that the concentration of MLSS: 2639 mg/l (Designed value: 4840 mg/l) and concentration MLVSS: 1179 mg/l (Designed value: 3872 mg/l) are less than the designed values, which indicates the poor operation of the SBR.
- VI. The CETP has installed Online Continuous Effluent Monitoring System (OCEMS) at the final outlet of treated effluent for the parameters- pH, TSS, COD, BOD with connectivity to PPCB & CPCB servers. During the visit, the OCEMS was found operational and variation in OCEMS reading compared with the monitored results was also reported which indicates the improper working / validation / calibration of OCEMS system.
- VII. During the visit, it was observed that the CETP has provided sludge storage facility and obtained membership from M/s Re-sustainability Limited (M/s Ramky Enviro Engineers Limited) for disposal of sludge. The CETP had disposed 602.685 MT sludge during the period of 02.04.2023 to 31.03.2024, through TSDF.

**D. CETP - 500 KLD CETP, Plot No. D-260-261, Phase-VIII, Focal Point, Ludhiana, Punjab.**

- I. During the visit on 23.04.2024, the CETP was found operational with the flow rate of 450 KLD. It is informed that the CETP receives effluent through dedicated tankers from member units through vehicles (56 in number) equipped with GPS system for carrying effluent. The CETP comprised of physico-chemical process followed by filtration, two stage Reverse Osmosis (RO) followed by evaporator to achieve ZLD as per the consent and EC condition.
- II. The Air consent is valid upto 30.06.2028 and the Water consent is valid upto 30.06.2027 for the operation of 500 KLD CETP. However, the Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 was valid till 16.06.2021. It was informed that the CETP has applied for renewal of authorization to PPCB on 01.10.2021.
- III. It was reported that 1613 Electroplating industries / Metal Surface Treatment units have obtained membership from CETP and connected to the CETP at the time of

visit. It was also informed by the CETP operator that inlet norms for CETP is not prescribed in the consent.

- IV. On the day of visit, it was observed that the flow meters are installed at RO Feed, RO Reject, Evaporators Vessels feed and Evaporator concentrate. It was reported that the CETP have not installed differential pressure gauge system at Cation-Anion and Carbon filter systems which can be used to indicate the choking/scaling of filtration system.
- V. During the visit, grab samples were collected from the RO outlet of CETP. The analysis result reveals that treated effluent is complying with the notified discharge standards. Discharge of effluent from the CETP premises was not observed during visit. It is reported that treated effluent (RO Permeate and Condensate) is used for cooling tower makeup water, plantation, gardening, watering to MC parks, DC office, NH-95, construction work. The CETP has also made agreement with M/s Vardhman Special Steels Limited C-58, Focal point Phase-3, Ludhiana, to take 100 KLD treated effluent through tankers for using in different purpose as per requirement. Furthermore, the CETP operator has maintained the records of the treated effluent taken by the users for gardening, construction activities & industrial use and others. The CETP has established an Environmental laboratory.
- VI. The CETP has installed OCEMS (Electromagnetic flow meter, PTZ camera) at the final outlet / RO permeate which is connected to CPCB/PPCB portal in compliance of CPCB directions.
- VII. The CETP has installed 05 KLD STP with Moving Bed Biofilm Reactor (MBBR) for treatment of domestic wastewater.

**AND, NOW, THEREFORE**, in exercise of powers conferred under section 18(1) (b) of the Water (Prevention & Control of Pollution) Act, 1974 and Air (Prevention and control of pollution) Act, 1981, Punjab Pollution Control Board (PPCB) is hereby directed to take appropriate action including imposing environmental compensation and to ensure that CETPs are operated ensuring.

- a. Operation/augmentation of the treatment system, appropriately, so as to meet the prescribed discharge standards and to comply with the disposal condition mentioned in the Environmental clearance by MoEF & CC dated 03.05.2013 and 08.12.2014 in the aforesaid 40 MLD, 50 MLD and 15 MLD CETPs. Further, to stop discharging of treated effluent into Buddha Nallah from the 50 MLD CETP, 40 MLD CETP and 15 MLD CETPs.



- b. With valid consent under the Water Act-1974 / Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 from PPCB and comply with all the conditions mentioned thereof.
- c. Undertaking regular calibration, maintenance and validation of the OCEMS analysers as per standard operating procedures/recommendations of the suppliers, so as to ensure generation of continuous & reliable data.

Further, PPCB is also hereby directed:

- a. To prescribe disposal condition to respective CETPs in accordance with the Environmental clearance by MoEF&CC dated 03.05.2013 and 08.12.2014.
- b. To prescribe the inlet standard for CETP in accordance to the CETP notification dated 01.01.2016.
- c. To regularly undertake verification of member industries of the CETP for ensuring proper operation of PETP/ETP by individual member industry.

The action taken by PPCB be intimated to CPCB within 15 days of receipt of these directions.

  
**(Bharat Kumar Sharma)**  
Member Secretary

**Copy to:**

1. **The Chairman** : for information, please.  
Punjab Pollution Control Board  
Vatavaran Bhawan, Nabha Road  
Patiala Punjab
2. **The Additional Secretary (CP Division)** : for information, please.  
Ministry of Environment, Forests & Climate  
Change,  
Prithvi Wing, 2<sup>nd</sup> Floor, Indira Paryavaran  
Bhawan, Jor Bagh Road,  
New Delhi-110 003.

3. **The Regional Director (Chandigarh)** : for follow-up, please.  
Central Pollution Control Board  
BSNL Telephone Exchange, 2<sup>nd</sup> Floor  
Sector – 49C, Chandigarh - 160047
4. **Divisional Head, WQM-I,** : for information, please.  
CPCB, Delhi
5. **Divisional Head, IPC-VI,** : for information, please.  
CPCB, Delhi
- ✓ 6. **Divisional Head, IT** : for uploading on CPCB  
CPCB, Delhi website, please.

(Bharat Kumar Sharma)



ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਰੋਕਥਾਮ ਬੋਰਡ  
PUNJAB POLLUTION CONTROL BOARD



PPCB/No. 24908

07 OCT 2024

Dated: 30.9.2024

To

The Member Secretary,  
Central Pollution Control Board,  
Parivesh Bhawan, Maharishi Valmiki Marg,  
East Arjun Nagar, Vishwas Nagar Extension,  
Vishwas Nagar, Shahdara,  
Delhi-110032.

**Subject:** Directions u/s 18(1)(b) of the Water (Prevention & Control of Pollution) Act, 1974 for non-compliance status of four CETPs namely- A. 40 MLD CETP, Near Central Jail, Tajpur Road (Focal Point Module), Ludhiana, Punjab, B. 50 MLD CETP, Near Central Jail, Tajpur Road (Tajpur - Rahon Road Cluster), Ludhiana, C. 15 MLD CETP, Bahadurke Road, Ludhiana and D. 500 KLD CETP, Plot no. D-260-61, Phase-8, Focal Point, Ludhiana, Punjab.

**Reference:** CPCB letter no. CPCB/IPC-VII/CETP-Ludhiana/3471 dated 12.08.2024.

Kindly refer to this office letter no. 22575 dated 09.09.2024 (copy enclosed).

2) In continuation of the said letter, the Punjab Pollution Control Board (PPCB) after receipt of the subject cited directions issued by the Central Pollution Control Board (CPCB) has extended an opportunity of personal hearing to the SPVs / CETPs of capacity 50 MLD, 40 MLD and 15 MLD before Chairman of the Board on 18.09.2024 (earlier scheduled to be held on 13.09.2024) before taking action as per directions issued by the CPCB.

3. After hearing, the representative of the SPVs / CETPs of capacity 50 MLD, 40 MLD and 15 MLD on 18.09.2024, the PPCB has issued directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974, thereby restraining the CETPs from discharging the effluent into the Budha Nallah or any other surface water body to comply with disposal conditions imposed in the Environmental Clearances. The relevant directions issued to the SPVs / CETPs of capacity 50 MLD, 40 MLD and 15 MLD are mentioned herein below:

ਵਾਤਾਵਰਣ ਭਵਨ, ਨਾਭਾ ਰੋਡ, ਪਟਿਆਲਾ

Vatavaran Bhawan, Nabha Road, Patiala - 147001

E-mail : [chairman.ptl.ppcb@punjab.gov.in](mailto:chairman.ptl.ppcb@punjab.gov.in), [msppcb@gmail.com](mailto:msppcb@gmail.com)

Phone No. 0175-2215793, 0175-2215802

**A. CETP of 15 MLD capacity located at Bahadur Ke Road, Ludhiana:**

1. That, the SPV shall ensure that the operation / augmentation of treatment system of CETP is appropriately made, so as to meet with the prescribed discharge standards and to comply with the disposal conditions mentioned in the Environmental Clearance granted by the Ministry of Environment, Forest and Climate Change dated 08.12.2014.
2. That, the SPV shall immediately stop the discharge of effluent from the CETP of 15 MLD capacity into Buddha Nallah or any other surface water body.

**B. CETP of 50 MLD capacity located at Tajpur Road, Ludhiana:**

1. That, the SPV shall meet with the prescribed discharge standards and to comply with the disposal conditions mentioned in the Environmental Clearance granted by the Ministry of Environment, Forest and Climate Change dated 03.05.2013.
2. That, the SPV shall immediately stop the discharge of effluent from the CETP of 50 MLD capacity into Buddha Nallah or any other surface water body.

**C. CETP of 40 MLD capacity located at Tajpur Road, Ludhiana:**

1. That, the SPV shall meet with the prescribed discharge standards and to comply with the disposal conditions mentioned in the Environmental Clearance granted by the Ministry of Environment, Forest and Climate Change dated 03.05.2013.
2. That, the SPV shall immediately stop the discharge of effluent from the CETP of 40 MLD capacity into Buddha Nallah or any other surface water body.

4) In further compliance to the directions issued by the CPCB, the Punjab Pollution Control Board is in process of notifying the PETP standards for the dyeing units connected with the said CETPs so as to meet with inlet quality criteria for proper & effective operation of the said CETPs.

5) The copies of the directions issued by the Punjab Pollution Control Board to CETPs of capacity 50 MLD, 40 MLD and 15 MLD in pursuance of the directions of CPCB are enclosed herewith for persual and further action please.

D/A: As above.

  
Member Secretary

ਵਾਤਾਵਰਣ ਭਵਨ, ਨਾਭਾ ਰੋਡ, ਪਟਿਆਲਾ

Vatavaran Bhawan, Nabha Road, Patiala - 147001

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ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਰੋਕਥਾਮ ਬੋਰਡ  
PUNJAB POLLUTION CONTROL BOARD



Zonal Office-II, E-648-B, Back Side CICU Office, Phase-5, Focal Point, Ludhiana  
E-mail: seezo2/dhppcb@yahoo.com

Ph No. 0161-2670141

No. PPCB/SEE/ZO-2/LDH/2024/5885

Regd.

Dated ..25/09/24

To

The Chairman,  
Punjab Dyers Association 50 MLD CETP Plant,  
Backside Central Jail, Tajpur Road, Ludhiana.

**Sub: Directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988.**

Whereas, Punjab Dyers Association (SPV) is operating a Common Effluent Treatment Plant (CETP) of capacity 50 MLD installed for treatment of waste water of the cluster of textiles dyeing industries located at Tajpur Road in Ludhiana.

And whereas, since the inception and commissioning, the SPV of 50 MLD capacity is being pursued by the Board from time to time for the compliance of the provisions of environmental laws especially the Water (Prevention and Control of Pollution) Act, 1974 by way of issuing notices, requests, reminders and affording of opportunities of hearing before the Competent Authority. The officers of the Board are also carrying out the monthly monitoring of the Common Effluent Treatment Plant since the commissioning of the CETP.

And whereas, the SPV was granted consent to operate under Water (Prevention & Control of Pollution) Act, 1974, vide no. CTOW/Fresh/LDH3/2022/18475759 dated 23.08.2022, valid upto 22.08.2023 for the treatment of waste water generated from the cluster of textiles dyeing industries located at Tajpur Road in Ludhiana with following special conditions that:

1. The SPV shall install and connect the flow meters at individual outlets of industries into conveyance system and flow meter at inlet / outlet of CETP with the web-based server by 25.08.2022.
2. The SPV shall complete the construction work of hazardous waste storage room at site by 25.08.2022.
3. The SPV shall submit the feasibility report to reuse treated effluent onto land for irrigation by 25.08.2022.
4. The SPV shall ensure that there is no overflow from the manholes in the conveyance system of CETP 50 MLD at any locations.
5. The SPV shall construct a proper outlet before discharge into Budha Nallah, from where effluent sample can be collected, within 10 days and also install one set of additional OCEMS at the said location, within one month.
6. The SPV shall stabilize the CETP so as to achieve the prescribed standard at the final outlet by 30.09.2022 failing which the Board shall be constrained to refuse consent to operate the outlet & issue closure directions to the member industries & impose Environmental Compensation without any further notice.
7. The SPV shall submit the feasibility report for discharge of treated effluent onto land for irrigation by 25.08.2022.

And whereas, the officer further brought out that in compliance of directions of the Central Monitoring Committee (CMC), CPCB has carried out inspection and monitoring of the Buddha Nallah and River Sutlej on 02.04.2024. The CPCB has also carried out inspection of 04 CETPs located at Ludhiana on 22.04.2024 and issued directions u/s 18(1)(b) of the Water (Prevention and Control of Pollution) Act, 1974 to the Punjab Pollution Control Board regarding non-compliance of four CETPs of Ludhiana. The CETP of capacity 50 MLD was visited by the team of CPCB and following observations were made:

1. During the visit on 22.04.2024, the CETP was found operational with the flow rate of 46 MLD. The CETP receives effluent through dedicated underground pipeline and the treatment is based on Sequential Batch Reactor (SBR) technology. It was informed to the team that as per the consent, the CETP is permitted to discharge the treated effluent into Buddha Nallah (which meets River Sutlej) through underground pipeline from CETP. However, as per the EC issued by MoEF&CC to the CETP dated 03.05.2013, "the treated wastewater will be used for irrigation" and it is also mentioned in the special terms & conditions that, "There shall be no discharge into Buddha Nallah".
2. The consent under the Air Act, 1981 is valid upto 31.03.2026 for the operation of 50 MLD CETP. However, the Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 was valid till 04.12.2023 and the consent under the Water Act, 1974 was valid till 22.08.2023. The CETP has not got its consent under the Water (Prevention & Control of Pollution) Act, 1974 and authorization under the Hazardous & Other Wastes (Management and Trans-boundary Movement) Rules, 2016 renewed, till date.
3. It was reported that 110 Dyeing and Printing units have obtained membership from common effluent treatment plant, it was also informed by the CETP operator that inlet norms for CETP is not prescribed in the consent.
4. Grab samples were collected from the CETP during monitoring. The analysis result of samples collected from CETP outlet reveals that BOD: 128 mg/l (Standard: 30 mg/l), COD: 382 mg/l (Standard: 250 mg/l) and Chloride: 1713 mg/l (Standard: 1000 mg/l) exceeds the notified effluent discharge standards for CETP. Remaining monitored parameters are within the prescribed standards.
5. Grab sample were also collected from the Sequential Batch Reactor (SBR) tank for MLSS & MLVSS. The analysis result reveals that the concentration of MLSS: 300 mg/l (Designed value: 5000 mg/l) and concentration of MLVSS: 215 mg/l (Designed value: 4000 mg/l) are less than the designed values, which indicates the poor operation of the SBR.
6. The CETP has installed Online Continuous Effluent Monitoring System (OCEMS) at the final outlet of treated wastewater for the parameters pH, TSS, COD, BOD, with connectivity to PPCB & CPCB servers. During the visit, the OCEMS was found operational and variation in OCEMS reading compared with the monitored results - was also reported which indicates the improper working / validation / calibration of OCEMS system.
7. During the visit, it was observed that the CETP has provided sludge storage facility and obtained membership from M/s Re-sustainability Limited (M/s Ramky Enviro Engineers Limited) for disposal of sludge. The CETP had disposed 1597.20 MT sludge during the year 2023-24 through TSDF and further, as per log book records, about 173 MT was stored in the premises.

And whereas, the SPV is violating the provisions of the Water (Prevention & Control of Pollution) Act, 1974.

And whereas, Environmental Engineer, Zonal Office-2, Ludhiana brought out that in light of deficiencies as observed by CPCB team of officers in operation of the CETPs of Ludhiana installed for dyeing units during its visit on 22.04.2024, the Central Pollution Control Board has issued directions u/s 18/1(b) of the Water (Prevention & Control of Pollution) Act, 1974 to the Punjab Pollution Control Board vide letter no. CPCB/IPC-VII/CETP-Ludhiana/3471 dated 12.08.2024 to take appropriate action in the matter including imposition of Environmental Compensation and to ensure that the CETP is operated ensuring:

- a) *Operation/ augmentation of the treatment system, appropriately, so as to meet the prescribed discharge standards and to comply with the disposal condition mentioned in the Environmental Clearance by MoEF&CC dated 03.05.2013 and 08.12.2014 in the aforesaid 40 MLD, 50 MLD & 15 MLD CETPs. Further, to stop discharging of treated effluent into Buddha Nallah from 50 MLD, 40 MLD & 15 MLD CETPs.*

- b) *With valid consent under the Water Act, 1974/ Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 form PPCB and comply with all the conditions mentioned thereof.*
- c) *Undertaking regular calibration, maintenance and validation of the OCEMS analysers as per standard operating procedures/recommendations of the suppliers, so as to ensure generation of continuous & reliable data.*

And whereas, vide the said directions dated 12.08.2024, the Punjab Pollution Control Board has been further directed by Central Pollution Control Board as under:

- a. To prescribe disposal condition to respective CETPs in accordance with the Environmental Clearance by MoEF&CC dated 03.05.2013 & 08.12.2014.
- b. To prescribe inlet standards for CETP in accordance to the CETP notification dated 01.01.2016.
- c. To regularly undertake verification of member industries of the CETP for ensuring proper operation of PCTP/ETP by individual member industry.

And whereas, considering the directions issued by the Central Pollution Control Board u/s 18(1) (b) of the Water (Prevention and Control of Pollution) Act, 1974 to the Punjab Pollution Control Board vide letter dated 12.08.2024, notice to issue directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988 was issued to the SPV with an opportunity of personal hearing before Chairman of the Board on 13.09.2024 (postponed to 18.09.2024).

And whereas, Sh. Vivek Jindal & Sh. G.P. Singh, Directors of SPV (CETP 50 MLD) and Sh. I.K. Kapila, Advocate, Hon'ble Supreme Court of India attended the hearing and submitted a written reply which was taken on record. At first instance, the representatives had shown disagreement with the technical report of the CPCB in light of assumed technical errors and requested for resampling of the CETP. The representatives further informed that the OCEMS system had been got calibrated. Regarding utilization of treated wastewater for irrigation purposes, no proposal was submitted by the representatives of the SPV. It was further informed that the SPV has applied for obtaining consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 to the Board.

And whereas, during hearing, it was observed by the Competent Authority that the SPV was earlier granted Environmental Clearance by the MoEF&CC on 03.05.2013 with a specific condition that there shall be no discharge into the Buddha Nallah. The SPV is constantly being pursued by the Board to submit proposal / feasibility report to re-use the effluent onto land for irrigation as a condition of consent to operate granted temporarily under the Water (Prevention & Control of Pollution) Act, 1974 as well as in various hearings afforded to the SPV by the Competent Authority / Chairman of the Board. But, the SPV has failed to submit any proposal in this regard and thus the SPV is violating the provisions of Environmental Clearance obtained from the Ministry of Environment, Forest and Climate Change, Government of India. Even after the imposition Environmental Compensation and Bank Guarantee for compliance of environmental norms, the SPV is still violating the provisions of the Water (Prevention & Control of Pollution) Act, 1974 as concluded by the CPCB in its report.

And whereas, the representatives of the SPV could not give any satisfactory reply to the observations raised by the competent authority during the course of hearing.

And whereas, after detailed deliberations and hearing the representatives of SPV, officers of the Board and taking into consideration various factors including the seriousness of the issue, the Chairman of the Board observed that the objective to restrain the discharge of effluent into Budha Nallah cannot be achieved except with the issuance of directions. It is a fit case to invoke the provisions of section 33-A of the Water (Prevention and Control of Pollution) Act, 1974 for issuance of suitable directions to the SPV operating the CETP of 50 MLD capacity at Tajpur Road, Ludhiana. Hence, the Chairman of the Board in exercise of the powers conferred

u/s 33-A of the Water (Prevention and Control of Pollution) Act, 1974 decided to issue the following directions to the SPV of CETP of 50 MLD capacity:

1. The SPV shall meet with the prescribed discharge standards and to comply with the disposal conditions mentioned in the Environmental Clearance granted by the Ministry of Environment, Forest and Climate Change dated 03.05.2013.
2. The SPV shall immediately stop the discharge of effluent from the CETP of 50 MLD capacity into Buddha Nallah or any other surface water body.

And whereas, the proceedings of the hearing were conveyed to the industry vide no. 5795-96 dated 25.09.2024.

Now, therefore, the Competent Authority of the Punjab Pollution Control Board, in exercise of the powers conferred upon it u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988, issues the following directions:

1. That, the SPV shall meet with the prescribed discharge standards and to comply with the disposal conditions mentioned in the Environmental Clearance granted by the Ministry of Environment, Forest and Climate Change dated 03.05.2013.
2. That, the SPV shall immediately stop the discharge of effluent from the CETP of 50 MLD capacity into Buddha Nallah or any other surface water body.

In case of failure to comply with the above said directions, you are liable for action u/s 41 of the Water (Prevention and Control of Pollution) Act 1974 as amended in 1988.

Endst. No. 5806

*dlf*  
For and on behalf of  
Punjab Pollution Control Board  
Dated 25/09/24

A copy of the above is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana for information and necessary action. He is also directed to submit report regarding effective compliance of above said directions, within 3 days positively.

*a*  
*dlf*  
For and on behalf of  
Punjab Pollution Control Board





ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਰੋਕਥਾਮ ਬੋਰਡ  
PUNJAB POLLUTION CONTROL BOARD



Zonal Office-II, E-648-B, Back Side CICU Office, Phase-5, Focal Point, Ludhiana  
E-mail: seezo2dhppcb@yahoo.com

Ph No. 0161-2670141

No. PPCB/SEE/ZO-2/LDH/2024/5809-03

Regd.

Dated 25.09.24

To

- 1) The Chairman,  
Bahadur Ke Textile & Knitwear Association (SPV),  
C/o M/s Adinath Dyeing & Finishing Mills, Bahadurke Road,  
Dyeing Complex, Ludhiana.
- 2) The Director,  
Bahadur Ke Textile & Knitwear Association (SPV),  
C/o M/s Shri Balaji Finishing Mills, Bahadurke Road,  
Dyeing Complex, Ludhiana.

Sub: **Directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988.**

Whereas, Bahadur Ke Textile Knitwear Association (SPV for CETP) has installed and is operating the Common Effluent Treatment Plant (CETP) of capacity 15 MLD for treatment of waste water from the cluster of textiles dyeing industries located at Bahadur Ke Road in Ludhiana.

And whereas, earlier the SPV was granted consents to operate under Water (Prevention and Control of Pollution) Act, 1974 vide no. CTOV/Renewal/LDH3/2022/18251904 dated 05.07.2022 and Air (Prevention & Control of Pollution) Act, 1981 vide no. CTOA/Varied/LDH3/2023/ 20380901 dated 25.04.2023, to operate the CETP of capacity 15 MLD for the treatment of effluent generated from dyeing industries located at Bahadurke Road, Ludhiana, both the consents had expired on 04.01.2023 and 31.03.2024 respectively.

And whereas, since the inception and commissioning, the SPV of 15 MLD capacity is being pursued by the Board from time to time for the compliance of the provisions of environmental laws especially the Water (Prevention and Control of Pollution) Act, 1974 by way of issuing notices, requests, reminders and affording of opportunities of hearing before the Competent Authority. The officers of the Board are also carrying out the monthly monitoring of the Common Effluent Treatment Plant since the commissioning of the CETP.

And whereas, the SPV, BKTKA was given personal hearing before the Chairman of the Board on 15.06.2023 u/s 33-A of Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988 for non-achievement of effluent discharge standards at final outlet of CETP-15 MLD. After hearing the representations of the SPV and the officers of the Board and considering the relevant facts of the case, the Chairman of the Board has decided as under:

1. SPV shall submit a time bound proposal for up-gradation and augmentation of the CETP along with PERT Chart so as to achieve the prescribed standards as well as the standards as mentioned in the DPR appraised at the time of approval of financial aid received from, the Government for this CETP, within 30 days.
2. SPV shall submit a time bound proposal for 2nd Phase of up-gradation of CETP to ZLD along with PERT Chart as per the condition of Environmental Clearance granted by MoEF&CC, within 30 days.
3. SPV shall take all necessary measures to reduce the concentration of various pollutants at source including pretreatment in the member units wherever required so as to meet with inlet standards of DR at CETP and issue necessary directions to this effect to the member units.
4. Till the up-gradation of CETP, SPV shall operate the existing CETP with best of its ability, adequately and efficiently so as to achieve the prescribed standards.

5. SPV shall also work on the removal of colour at the final outlet of the CETP to achieve the desired standards as well as to the visual satisfaction.
6. SPV shall submit the performance bank guarantee of remaining amount after deduction of the EC i.e. (2,40,00000 - 77,62,500 = 1,62,37,500) of Rs. 1,62,37,500/-, within 15 days.
7. SPV shall get installed SCADA enabled flow meters with all the member units at intake supply (submersible pumps / MC supply / other sources) having connectivity with the Online Monitoring System of CETP and access to Punjab Pollution Control Board, within one month to ensure that no bye-pass of effluents is being operated by them. Till the installation of online meters, the industry shall must have EMF or mechanical meter at intake supply for which record is to be maintained on day to day basis.
8. SPV shall provide flow meter, CCTV cameras and Online Monitoring Mechanism at its final outlet leading to Buddha Nallah, within one month.
9. Environmental Compensation for the period of 20.04.2022 to 11.05.2023 (date of last sampling) shall be imposed on the SP for not operating the CET properly and efficiently resulting in non-achievement of results. Regional Office-3, Ludhiana to calculate the amount of Environmental Compensation and obtain necessary approvals.
10. Legal action against the SPV (CETP 15 MLD, Bahadur Ke Road, Ludhiana) and its Directors (M/s Bahadur Ke Textile & Knitwear Association (SPV) as well as CETP operator be initiated in the Competent Court of Jurisdiction.

And whereas, the SPV has not complied with the decisions of the hearing mentioned above from serial no.1 to serial no. 06 as the SPV has neither submitted any proposal to adopt ZLD nor submitted bank guarantee of remaining amount after deduction of the EC.

And whereas, the CETP of capacity 15 MLD installed at Bahadurke Road, Ludhiana for the treatment of effluent generated from the dyeing industries of Bahadurke cluster is fully operational since July 2020 and CETP is being regularly monitored by the Board on monthly basis. The CETP has failed to achieve the stringent discharge standards prescribed by the Board for the CETP since its commissioning.

And whereas, the SPV had applied for renewal of consent to operate under Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution) Act, 1981 and accordingly, CETP 15 MLD was visited by officer of the Board on 11.04.2024 and it was observed as under:

1. CETP was in operation for the treatment of effluent generated from the member dyeing industries. DAF was also in line and operational.
2. CETP had recently added 03 new sludge de-watering machines alongwith 02 existing sludge centrifuge pumps and these newly installed 03 machines were in operation and existing 02 were in standby mode.
3. The recently added 01 wood fired boiler of capacity 01TPH with cyclone separator as an APCD alongwith steam paddler drier was also in operation.
4. During visit effluent was collected and sent to the Board's lab for analysis, as per the analysis report CETP is achieving the discharge standards prescribed by the MoEF&CC except one parameter i.e. TDS but it has failed to achieve stringent discharge standards prescribed by the Board.
5. CETP is complying with the provisions of the Air (Prevention & Control of Pollution) Act, 1981.

And whereas, the SPV has failed to comply with the decisions taken during the personal hearing dated 16.06.2023 and to achieve stringent effluent discharge standards. Thus, the SPV was found violating the provisions of the Water (Prevention & Control of Pollution) Act, 1974.

And whereas, the SPV was granted Environmental Clearance vide MoEF&CC letter dated 08.12.2014 for the establishment of CETP based on Zero Liquid Discharge (ZLD). Thereafter a follow up meeting of Appraisal Committee on CETP was held in the MoEF&CC on 03.03.2016

and during the meeting it was decided that the SPV shall install CETP based on conventional treatment method in 1st phase and may adopt ZLD in 2nd phase. Minutes of the said meeting were issued vide MoEF&CC letter dated 18.03.2016, but the SPV has not submitted any proposal till date to adopt 2nd phase i.e. ZLD.

And whereas, the SPV has filed appeals before the Appellate Authority-cum-Secretary to Government of Punjab, Department of Science Technology and Environment against following decisions of the Board:

1. Imposition of EC amounting to Rs. 01 crore to the SPV vide minutes of meeting dated 08.10.2021.
2. Imposition of EC amounting to Rs. 77.625 Lacs to the SPV vide Board's no. 335 dated 4.10.2022
3. Against the decision of the Board to obtain Performance Bank Guarantee of Rs. 2.4 Crores from the SPV.

And whereas, however, above appeals filed by the SPV were decided and dismissed by the Appellate Authority-cum-Secretary to Government of Punjab, Department of Science, Technology and Environment vide orders dated 20.05.2024.

Environmental Compensation (EC) amounting to Rs.1 crore has already been deposited by the SPV and EC amounting to Rs.77.625 lacs has been recovered from the amount of performance bank guarantee of Rs. 2.4 crore earlier submitted by the SPV. However, the SPV has not submitted performance bank guarantee of remaining amount after deduction of the EC amounting to Rs. 77.625 Lac by the Board i.e.  $(2,40,00,000 - 77,62,500 = 1,62,37,500)$  till date. The appeal filed by the SPV against this BG has already been dismissed by the Appellate Authority.

And whereas, the SPV is not complying with the decisions of the Competent Authority.

And whereas, show cause notice for refusal of consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 was issued to the SPV with an opportunity of personal hearing before the Chairman of the Board on 09.07.2024 postponed to 12.07.2024, postponed to 16.07.2024 and postponed to 23.07.2024. No one on behalf of SPV attended the hearing. Considering the request of the SPV, the hearing was further postponed to 09.08.2024. However, no one on behalf of SPV again attended the hearing on 09.08.2024.

And whereas, keeping in view the act and conduct of the SPV, it was observed that the SPV is not serious about resolving the issues / violations reported on part of the CETP and SPV is not attending the hearing being afforded by the Board to avoid the implementation of the provisions of Environmental Laws. After considering all the aspects of the case, the Chairman of the Board decided to proceed ex-parte and has taken the following decisions:

1. The consent to operate applied by the SPV under the Water (Prevention & Control of Pollution) Act, 1974 be refused as ex-parte decision.
2. Notice to issue directions u/s 33-A of the Water Act, 1974 to take measures to control the pollution generated by the CETP, which may include taking legal action against the responsible persons of the SPV, to stop the transaction of the bank account of SPV with immediate effect, to impose the appropriate Environmental Compensation based on polluter pays principle and to upgrade the existing CETP to the ZLD, be issued to the SPV alongwith an opportunity of personal hearing before the Chairman of the Board.

And whereas, the proceedings were conveyed to the SPV vide Board's letter no. 5336-37 dated 29.08.2024.

And whereas, in compliance to the decisions of hearing the consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 was refused vide no. CTOW/Renewal/LDH3/2024/ 25302219 dated 30.08.2024.

And whereas, in compliance of directions of the Central Monitoring Committee (CMC), CPCB has carried out inspection and monitoring of the Buddha Nallah and River Sutlej on 02.04.2024. The CPCB has also carried out inspection of 04 CETPS located at Ludhiana on

22.04.2024 and issued directions u/s 18(1)(b) of the Water (Prevention and Control of Pollution) Act, 1974 regarding non-compliance of four CETPs of Ludhiana. The CETP of capacity 15 MLD was visited by the team of CPCB and following observations were made:

1. During the visit on 22.04.2024, the CETP was found operational with the flow rate of 11.26 MLD. The CETP receives effluent through dedicated underground pipeline and the treatment is based on Sequential Batch Reactor (SBR) technology. It was informed that the CETP is discharging the treated effluent into Buddha Nallah (which meets River Sutlej) through underground pipeline from the CETP. However, as per EC issued by MoEF&CC on 08.12.2014, the CETP is required to establish a Zero Liquid Discharge system.
2. The consent under the Air Act, 1981 is valid upto 31.03.2025 for the operation of 15 MLD CETP. However, the consent under the Water Act, 1974 was valid till 04.01.2023 and the Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 was valid till 04.10.2022 for which the CETP has applied for renewal to PPCB.
3. During visit, it was informed to the team that 36 Dyeing/Printing/washing units had obtained membership from CETP and connected to the CETP.
4. Grab samples were collected from the CETP during monitoring. The analysis results of sample collected from CETP outlet reveals that B OD: 243 mg/l (Standard: 30 mg/l), COD: 587 mg/l (Standard: 250 mg/l), Chloride: 1904 mg/l (Standard: 1000 mg/l) and Sulphide: 16 mg/l (Standard: 2 mg/l) exceeds the notified effluent discharge standards for CETP. Remaining monitored parameters were found within the prescribed standards.
5. Further, the grab samples were collected from the Sequential Batch Reactor (SBR) tank for MLSS & MLVSS. The sample analysis results reveals that the concentration of MLSS: 2639 mg/l (Designed value: 4840 mg/l) and concentration MLVSS: 1179 mg/l (Designed value: 3872 mg/l) are less than the designed values, which indicates the poor operation of the SBR.
6. The CETP has installed Online Continuous Effluent Monitoring System (OCEMS) at the final outlet of treated effluent for the parameters pH, TSS, COD, BOD with connectivity to PPCB & CPCB servers. During the visit, the OCEMS was found operational and variation in OCEMS reading compared with the monitored results was also reported which indicates the improper working / validation / calibration of OCEMS system.
7. During the visit, it was observed that the CETP has provided sludge storage facility and obtained membership from M/s Re-sustainability Limited (M/s Ramky Enviro Engineers Limited) for disposal of sludge. The CETP had disposed 602.685 MT Sludge during the period of 02.04.2023 to 31.03.2024, through TSDF.

And whereas, the SPV is violating the provisions of the Water (Prevention & Control of Pollution) Act, 1974.

And whereas, Environmental Engineer, Zonal Office-2, Ludhiana brought out that in light of deficiencies as observed by CPCB in operation of the CETPs of Ludhiana installed for dyeing units on its visit on 22.04.2024, the Central Pollution Control Board has issued directions u/s 18/1(b) of the Water (Prevention & Control of Pollution) Act, 1974 vide letter dated 12.08.2024 to take appropriate action including imposing Environmental Compensation and to ensure that the CETP is operated ensuring:

- a) Operation/ augmentation of the treatment system, appropriately, so as to meet the prescribed discharge standards and to comply with the disposal condition mentioned in the Environmental Clearance by MoEF&CC dated 03.05.2013 and 08.12.2014 in the aforesaid 40 MLD, 50 MLD & 15 MLD CETPs. Further, to stop discharging of treated effluent into Buddha Nallah from 50 MLD, 40 MLD & 15 MLD CETPs.

- b) With valid consent under the Water Act, 1974/ Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 from PPCB and comply with all the conditions mentioned thereof.
- c) Undertaking regular calibration, maintenance and validation of the OCEMS analysers as per standard operating procedures/recommendations of the suppliers, so as to ensure generation of continuous & reliable data.

And whereas, Punjab Pollution Control Board was further directed by Central Pollution Control Board as under:

- a. To prescribe disposal condition to respective CETPs in accordance with the Environmental Clearance by MoEF&CC dated 03.05.2013 & 08.12.2014.
- b. To prescribe inlet standards for CETP in accordance to the CETP notification dated 01.01.2016.
- c. To regularly undertake verification of member industries of the CETP for ensuring proper operation of PEP/ETP by individual member industry.

And whereas, notice to issue directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988 was issued to the SPV with an opportunity of personal hearing before Chairman of the Board on 13.09.2024 postponed to 18.09.2024.

And whereas, Sh. Lalit Jain, Director of the SPV (CETP of 15 MLD) alongwith Sh. I.K. Kapila, Advocate, Hon'ble Supreme Court of India attended the hearing and submitted a written reply which was taken on record. The representatives stated that although the EC was obtained by the SPV for ZLD based treatment but later on the project was conceived on the SBR based secondary level treatment. The representatives further contended that other two CETPs of 40 MLD & 50 MLD capacity were duly sanctioned without any condition / requirement for ZLD level treatment. Regarding the submission of Bank Guarantee as per decision of personal hearing afforded to the SPV by Chairman of the Board on 16.06.2023, the representatives informed that the SPV has challenged the said decision by way of filing appeal before the Appellate Authority and the decision is pending. The representatives disagreed with the technical observations as reported by the CPCB and did not find the same acceptable to the SPV and insisted not to penalize the SPV on the basis of the said report. The representatives further informed that the SPV has applied for obtaining the consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 with the Board.

And whereas, during hearing, it was observed by the Competent Authority that the SPV has been constantly pursued by the Board to submit proposal for upgradation of the CETP to ZLD technology in consonance with the EC conditions and thus not to discharge its effluent into the Buddha Nallah. However, the SPV has not taken any step in this direction. The Ludhiana city has been declared as critically polluted area due to various reasons and one of the reasons is the activities of the industrial units in violation of the environmental norms. Though the Board has imposed EC and performance Bank Guarantee but the SPV is still violating the provisions of the Water (Prevention and Control of Pollution) Act, 1974.

And whereas, the representatives of the SPV could not give any satisfactory reply to the observations raised during the hearing.

And whereas, after detailed deliberations and hearing the representatives of SPV, officers of the Board and taking into consideration various factors including the seriousness of the issue, the Chairman of the Board observed that the objective to restrain the discharge of effluent into Budha Nallah cannot be achieved except with the issuance of directions. It is a fit case to invoke the provisions of section 33-A of the Water (Prevention and Control of Pollution) Act, 1974 for issuance of suitable directions to the SPV operating the CETP of 15 MLD capacity at Bahadurke Road, Ludhiana. Hence, the Chairman of the Board in exercise of the powers conferred u/s 33-A of the Water (Prevention and Control of Pollution) Act, 1974 decided to issue the following directions to the SPV of CETP of 15 MLD capacity:

1. The SPV shall ensure that the operation / augmentation of treatment system of CETP is appropriately made, so as to meet with the prescribed discharge standards and to comply with the disposal conditions mentioned in the Environmental Clearance granted by the Ministry of Environment, Forest and Climate Change dated 08.12.2014.
2. The SPV shall immediately stop the discharge of effluent from the CETP of 15 MLD capacity into Buddha Nallah or any other surface water body.

And whereas, the proceedings of the hearing were conveyed to the industry vide no. 5798-99 dated 25.09.2024.

Now, therefore, the Competent Authority of the Punjab Pollution Control Board, in exercise of the powers conferred upon it u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988, issues the following directions:

1. That, the SPV shall ensure that the operation / augmentation of treatment system of CETP is appropriately made, so as to meet with the prescribed discharge standards and to comply with the disposal conditions mentioned in the Environmental Clearance granted by the Ministry of Environment, Forest and Climate Change dated 08.12.2014.
2. That, the SPV shall immediately stop the discharge of effluent from the CETP of 15 MLD capacity into Buddha Nallah or any other surface water body.

In case of failure to comply with the above said directions, you are liable for action u/s 41 of the Water (Prevention and Control of Pollution) Act 1974 as amended in 1988.

Endst. No. 5804

*Ainf*  
For and on behalf of  
ok Punjab Pollution Control Board  
Dated 25/09/24.

A copy of the above is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana for information and necessary action. He is also directed to submit report regarding effective compliance of above said directions, within 3 days positively.

*Ainf*  
For and on behalf of  
ok Punjab Pollution Control Board



# PUNJAB POLLUTION CONTROL BOARD

Zonal Office-1, E-648-B, Phase-V, Focal Point, Ludhiana

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No. 5842

Speed Post/online

Date 26/09/24

To

M/s Punjab Dyers Association (Focal Point Module),  
8.65 Acre Land, Tajpur Road, Jamalpur Awana,  
Ludhiana.

**Sub:** Proceeding of the personal hearing given before the Chairman of the Board on 18.09.2024 w.r.t. notice to issue directions u/s 33-A of the Water Act, 1974 as well as show cause notice for revocation of consent to operate granted under the Water Act, 1974 alongwith notice for imposition of Environmental Compensation (EC).

**The following were present:**

**On behalf of Punjab Pollution Control Board**

Er. G. S. Majithia, Member Secretary, Punjab Pollution Control Board  
Er. Pardeep Gupta, Chief Environmental Engineer, Ludhiana  
Er. Ravinder Bhatti, Senior Environmental Engineer, Zonal Office-1, Ludhiana  
Er. Pardeep Balu, Add. Senior Environmental Engineer, Zonal Office-1, Ludhiana

**On behalf of the CETP**

No one attended the hearing.

The Senior Environmental Engineer, Zonal Office-1, Ludhiana brought out that the Punjab Dyers Association (PDA) was earlier granted consent under the Water Act, 1974 vide no. CTOW/Renewal/LDH1/2024/23519336 dated 28.06.2024 valid upto 30.06.2026 for discharge of trade effluent into Budha Nallah after treatment through CETP of 40 MLD (Focal Point Module) and domestic effluent onto land for plantation through septic tank.

The SPV was earlier given personal hearing before Chairman of the Board on 12.06.2023, wherein it was decided that on the basis of best assessment and judgment, an interim amount of Environmental Compensation (EC) of Rs. 75 lacs (Seventy Five Lacs) be imposed on the SPV (CETP 40 MLD, Focal Point Module) for violations made by the SPV and the SPV shall immediately deposit the same in the O/o Environmental Engineer, Regional Office-4, Ludhiana, within one week.

The CETP has deposited Environmental Compensation amounting to Rs. 40 Lacs vide RRR1722355084065 dated 21.06.2023 & Rs. 35 Lacs vide RRR1732355120611 dated 22.06.2023.

The Central Pollution Control Board (CPCB) has jointly carried out the inspection of Common effluent treatment plant (CETP- 40 MLD Focal Point Module) located in Ludhiana during April 22- 23, 2024 alongwith PPCB officers to verify the compliance status. The observations of the team are as under :-

1. The CETP is designed to treat 40 MLD capacity for treatment of effluent generated from dyeing & printing units located at focal point (Phase 1 to 08). However, presently, CETP operated at flow rate 29.00 MLD. The CETP is utilizing 73% of its capacity.
2. The CETP receives effluent through dedicated underground pipe line from member units to the CETP.
3. Pre-treatment system has not installed at individual member units level prior to send CETP inlet for treatment, as informed by the CETP operator.
4. Team observed that CETP operator has installed Electromagnetic Flow Meter at locations of Inlet receiving chamber, outlet of Equalization Tank, and final outlet of CETP.
5. The CETP is based on physico-chemical followed by biological (SBR) process. The CETP comprised of Receiving Chamber (20.83 m<sup>2</sup>) > Coarse Screen (Mechanical Manual) Raw effluent Collection Sump (416.670 m<sup>2</sup>) > Stilling Chamber (20.830 m<sup>3</sup>) > Fine Screen (mechanical + manual) Manual Grit Chamber (2 No., 81.0 m<sup>3</sup>) > Oil & Grease Skimmer > Equalization Tank (20040 m<sup>2</sup>) > PH Correction Tank-1 (555.560 m<sup>2</sup> Lime & FeSO<sub>4</sub>, dosing, RT-20 min) > Sludge Blanket Clarifier (3721.374 m<sup>3</sup>, Poly Dosing, RT-2.23 hr) > pH

Correction Tank-II (138.890 m<sup>3</sup>, RT-5 min) > SBR Basins (04), Chlorine Contact Tank (833.33 m<sup>3</sup>, RT-30 min) Treated Effluent Disposal > Centrifuge > Dryer.

6. The sample analysis result of collected samples from Equalization tank, final outlet of CETP are tabulated below:

Parameters	Sampling Locations		Standards
	Inlet of Equalization Tank	Final outlet of CETP	
Ph	8.2	8.3	6-9
TSS	181	28	100
TDS	4972	4636	--
Chloride	2551	2284	1000
Fluoride	1.1	0.9	2
Sulphate	295	461	1000
Sulphide	--	2.4	2
Phosphate as P	0.7	0.20	5
Ammonical Nitrogen	15	04	50
Nitrate-N	9.3	4.7	10
TKN	20	06	50
Phenol as (C <sub>6</sub> H <sub>5</sub> OH)	0.2	0.1	1
Oil & Grease	-	BDL	10
BOD	376	54	30
COD	943	262	250

All values are in mg/l except pH

7. It is evident from the above analysis results that the CETP is not complying with the prescribed MoEF & CC effluent norms w.r.t BOD, COD, Sulphide and Chloride.
8. During monitoring, the biomass concentration in the SBR basins MLSS 4661 mg/l (against the designed range 5000-7000 mg/l) MLVSS 3000 mg/l (against the designed range 3500-4200 mg/l) were respectively.
9. The MLSS and MLVSS were found less against designed range which indicates poor operation of the biological system.
10. Team collected samples of heavy metals from inlet and final outlet of CETP to verify the stipulated norms. The analysis results of heavy metal samples are given as below:

Sampling Location	Sample Code	T-Cr	Cd	Cu	Mn	Pb	Zn	Ni	As
I/L of Eq. Tank	40 A1	0.034	BDL	0.081	0.117	BDL	0.151	0.01	BDL
Final O/L	40 A6	BDL	BDL	1.108	0.107	BDL	0.015	0.005	BDL
Prescribed norms		02	0.05	03	02	0.1	05	03	0.2

All values are in mg/l except pH

11. The analysis results of heavy metals revealed that the CETP is complying with the prescribed effluent norms.
12. Online Continuous Effluent monitoring system OCEMS is installed at inlet and final outlet of CETP for measuring influent and effluent waste water quality. On the day of inspection, OCEMS at Inlet and final outlet of CETP were found operational. As informed by the CETP operator OCEMS of final outlet is connected to PPCB/CPCB server. The final outlet OCES values observed at time of sampling. The relative difference between online data and laboratory analysis data are presented below:

Sampling Location	Analysis results	Date/time 12.00 PM	Parameters			
			pH	TSS	COD	BOD
Final outlet of CETP	Lab Data	22/04/2024	8.3	28	262	54
	Online data	22/04/2024	7.9	46	188	25.7
% Variation w.r.t. Laboratory Data			(-)5.06	(+)64.28	(-)28.24	-52.40



13. The value recorded on line monitoring system values of pH, BOD, COD is lower than the lab analysis data however, value of TSS is higher than lab analysis data. Further it has been reported by CPCB that the CETP installed Online Continuous Effluent Monitoring System (OCEMS) at final outlet of treated effluent for the parameters-pH, TSS, COD, BOD with connectivity to PPCB & CPCB servers. During the visit, the OCEMS was found operational and variation in OCEMS reading compared with monitored results was also reported which indicates the improper working/validation/calibration of OCEMS system.
14. As informed by CETP operator that Bio sludge generated from SBR basin is collected into bio-sludge sump its further fed into centrifuge for dewatering whereas chemical sludge generated from Sludge Blanket Clarifier is collected into chemical sludge sump and it is fed into centrifuge for dewatering of the same. The filtrate of decanter is enrouted to pH Correction Tank -1 for further treatment.
15. At the time of visit, team observed that The CETP has made Shed for storage of the CETP sludge. As per log book records CETP sludge 3517.235 MT during (FY 23-24) was sent to TSDF M/s Re sustainability Limited (M/s Ramky Enviro Engineers Limited) for final disposal.
16. As per EC issued (MoEF&CC dated 13/05/2013) mentioned in special Terms & condition that the CETP shall not discharge into Budha Nallah. However, treated effluent of CETP is discharged into Budha Nallah through underground pipeline 1 km. The Budha Nallah is ultimately meeting into River Sutlej.

The Punjab Pollution Control Board is regularly monitoring the quality of the effluent at the inlet & outlet of the CETP and the latest results are as under:

Date	01.01.24	03.02.24	25.02.24	21.03.24	03.04.24	05.04.24	02.05.24	06.06.24	01.07.24	02.08.24	Standards	Design Standards
Parameter	Outlet	Outlet	Outlet	Outlet	Outlet	Outlet	Outlet	Outlet	Outlet	Outlet	MoEF/CC	
pH	8.1	8.3	8.2	8.2	8.0	8.0	8.2	8.2	8	8.26	6.0 - 9.0	5.5-9.0
TSS	12	28	85	39	20	49	34	59	50	43	100	50
TDS	2409	3541	4636	5688	3341	3993	3639	3984	2923	4074	2100	Inlet TDS +/- 10% variation
COD	120	112	140	152	148	136	148	139	76	142	250	100
BOD	17	16	22	27	22	20	28	27	14	26	30	10
O & G	8.0	5.8	4.8	7.2	6.2	6.6	5.8	5.4	5.6	6.2	10	10
Phenolic Compound	BDL	BDL	1.0	0.8	1.5	BDL	1	1	1	2.2	1	-
Sulphides	BDL	BDL	BDL	BDL	BDL	0.6	BDL	BDL	BDL	1.1	2	-
Amm. Nitrogen	2.5	4.7	5.4	BDL	3.4	2.8	2.8	1.2	BDL	1.6	50	2
SAR	32.5	34	36.16	41	20.9	36.0	25.8	BDL	BDL	BDL	-	-
Total Chromium	BDL	BDL	BDL	0.14	0.15	BDL	BDL	379	180	292	-	-
RSC	7.36	7.92	8.8	7.84	6.36	6.8	6.96	2	0.44	0.3	-	-
Bio-assay	90% survival of fish in 100% effluent in 96 Hr	100% survival of fish in 100% effluent in 96 Hr	100% survival of fish in 100% effluent in 96 Hr	100% survival of fish in 100% effluent in 96 Hr	100% survival of fish in 100% effluent in 96 Hr	100% survival of fish in 100% effluent in 96 Hr	100% survival of fish in 100% effluent in 96 Hr	90% survival of fish in 100% effluent in 96 Hr	90% survival of fish in 100% effluent in 96 Hr	70% survival of fish in 100% effluent in 96 Hr	90% survival of fish in 100% effluent in 96 Hrs.	90% survival of fish in 100% effluent in 96 Hrs.

The SPV is violating the provisions of the Water (Prevention & Control of Pollution) Act, 1974.

The CPCB vide its letter no. 3471 dated 12.08.2024, issued directions under section 18(1) (b) of the Water (Prevention & Control of Pollution) Act, 1974 and Air (Prevention and control of pollution) Act, 1981, to the Punjab Pollution Control Board (PPCB) to take appropriate action including imposing Environmental Compensation and to ensure that CETPs are operated ensuring:

- a. Operation/augmentation of the treatment system, appropriately, so as to meet the prescribed discharge standards and to comply with the disposal condition mentioned in the Environmental Clearance by MoEF & CC dated 03.05.2013 and 08.12.2014 in the

- aforesaid 40 MLD, 50 MLD and 15 MLD CETPs. Further, to stop discharging of treated effluent into Buddha Nallah from the 50 MLD CETP, 40 MLD CETP and 15 MLD CETPs.
- b. With valid consent under the Water Act-1974 / Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 from PPCB and comply with all the conditions mentioned thereof.
  - c. Undertaking regular calibration, maintenance and validation of the OCEMS analysers as per standard operating procedures/ recommendations of the suppliers, so as to ensure generation of continuous & reliable data.

Further, PPCB is also hereby directed:

- a. To prescribe disposal condition to respective CETPs in accordance with the Environmental Clearance by MoEF&CC dated 03.05.2013 and 08.12.2014.
- b. To prescribe the inlet standard for CETP in accordance to the CETP notification dated 01.01.2016.
- c. To regularly undertake verification of member industries of the CETP for ensuring proper operation of PETP/ETP by individual member industry.

A joint inspection was also conducted by the Board officers and MC officials on 25.07.2024 in response to a news item reporting the discharge of dyeing effluent onto the road in the Nichi Mangli area. During the inspection, only rainwater was found stagnated. The 02 dyeing industries namely M/s BPR Zippers and M/s Pacific Dyers located in Focal Point, Nichi Mangli, Ludhiana in the vicinity were also checked, and their discharge was confirmed to be flowing into the dedicated PDA sewer line. The MCL officials informed that the colored effluent had temporarily overflowed onto the road from the PDA sewer houndi due to high pressure from the dyeing effluent. The matter is regarding overflow of the PDA sewer line.

The PDA is required to produce following documents during the hearing:-

1. Mechanism adopted by the PDA to control the stipulated flow rate from each of the dyeing unit to avoid immediate and sudden discharge of effluent thereby incapacitating the dedicating conveyance line.
2. The complete conveyance line flow map alongwith the elevation, size of the pipeline and other requisite details indicating clear cut directions of effluent flow from Focal Point area to the CETP at Tajpur Road.
3. Stipulated flow rate prescribed for the above 2 units alongwith the record of the discharge as well as the average flow rate of last three months.
4. The record of discharge recorded by SCADA system installed at the extraction points of the above 2 dyeing units along with the record of the same for last three months.

In view of above, the CETP was issued notice to issue directions u/s 33-A of the Water Act, 1974 as well as show cause notice for revocation of consent to operate granted under the Water Act, 1974 alongwith notice for imposition of Environmental Compensation (EC) with hearing before Chairman of the Board on 13.09.2024, postponed to 18.09.2024. But, no one from the CETP attended the hearing.

It was observed by the Competent Authority that the SPV was earlier granted Environmental Clearance by the MoEF & CC on 03.05.2013 with a specific condition that there shall be no discharge into the Buddha Nallah. The SPV is constantly being pursued by the Board to submit proposal / feasibility report to re-use the effluent onto land for irrigation as a condition of consent to operate granted temporarily under the Water (Prevention & Control of Pollution) Act, 1974 as well as in various hearings afforded of the SPV by the Chairman of the Board. But, the SPV has failed to submit any proposal in this regard and thus the SPV is violating the provisions of Environmental Clearance obtained by it from the MoEF&CC. Further, the SPV has been imposed Environmental Compensation for violation of the provisions of the Water (Prevention & Control of Pollution) Act, 1974 as observed from time to time, but, the SPV is still violating the provisions of the Water (Prevention & Control of Pollution) Act, 1974 as concluded by the CPCB in its report.

The representatives of the SPV have neither attended the hearing nor have given any reply in writing to the observations raised in the show cause notice.

In the given circumstances, the Board has been left with no other alternative or option but to proceed ex-parte in the case and to take decisions on the basis of the available record keeping in view the Act and conduct of the CETP. The decisions shall be binding upon the CETP and in case of failure of the CETP to comply with the decisions mentioned below, further stringent action shall be taken by the Board in accordance with the provisions of law.

After detailed deliberations and hearing the officers of the Board and taking into consideration various factors including the seriousness of the issue, the Chairman of the Board observed that the objective to restrain the discharge of effluent into Budha Nallah cannot be achieved except with the issuance of directions. It is a fit case to invoke the provisions of section 33-A of the Water (Prevention and Control of Pollution) Act, 1974 for issuance of suitable directions to the SPV operating the CETP of 40 MLD capacity at Tajpur Road, Ludhiana. Hence, the Chairman of the Board in exercise of the powers conferred u/s 33-A of the Water (Prevention and Control of Pollution) Act, 1974 decided to issue the following directions to the SPV of CETP of 40 MLD capacity:

1. The consent to operate granted under the Water (Prevention & Control of Pollution) Act, 1974 be revoked.
2. The SPV shall meet with the prescribed discharge standards and to comply with the disposal conditions mentioned in the Environmental Clearance granted by the Ministry of Environment, Forest and Climate Change dated 03.05.2013.
3. The SPV shall immediately stop the discharge of effluent from the CETP of 40 MLD capacity into Buddha Nallah or any other surface water body.

Apart from the issuance of directions u/s 33-A of the Water (Prevention and Control of Pollution) Act, 1974 to the SPV of 40 MLD CETP as mentioned above, the concerned Environmental Engineer of Regional Office-1, Ludhiana may also be directed by making endorsement of the above order to carry out the following actions:

- a. To calculate the Environmental Compensation since the start of CETP considering continued violations being committed by the SPV by way of discharging its effluent into the Budha Nallah in violation of the conditions of Environmental Clearance granted by the Ministry of Environment, Forest and Climate Change by adjusting the period / amount of the EC already imposed by the Board and deposited by the SPV.
- b. To personally ensure the compliance of above said decisions and submit report with recommendations without any delay.

You are, therefore, requested to comply with the decisions of the personal hearing within stipulated period and submit compliance report to the Board.

Endst. No. 5643

A copy of the above is forwarded to the Member Secretary, Central Pollution Control Board, Parivesh Bhawan, New Arjun Nagar, Delhi- 110032 for kind information & necessary action, please.

For and on behalf of  
Punjab Pollution Control Board  
Dated 26/09/24

Endst. No. 5644

A copy of the above is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-1, Ludhiana for information & necessary action.

For and on behalf of  
Punjab Pollution Control Board  
Dated 26/09/24

For and on behalf of  
Punjab Pollution Control Board



ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਰੋਕਥਾਮ ਬੋਰਡ  
PUNJAB POLLUTION CONTROL BOARD



Zonal Office-II, E-648-B, Back Side CICU Office, Phase-5, Focal Point, Ludhiana  
E-mail: seezo2ldhppcb@yahoo.com

Ph No. 0161-2670141

No. PPCB/SEE/ZO-2/LDH/2024/5798-99

Regd.

Dated 25/09/24

To

- 1) The Chairman,  
Bahadur Ke Textile & Knitwear Association (SPV),  
C/o M/s Adinath Dyeing & Finishing Mills, Bahadurke Road,  
Dyeing Complex, Ludhiana.
- 2) The Director,  
Bahadur Ke Textile & Knitwear Association (SPV),  
C/o M/s Shri Balaji Finishing Mills, Bahadurke Road,  
Dyeing Complex, Ludhiana.

Sub: **Proceedings of the personal hearing given by Chairman of the Board on 18.09.2024 w.r.t notice to issue directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988.**

The following were present:

On behalf of PPCB

Er. G.S. Majithia, Member Secretary

Er. Pardeep Gupta, CEE, Ludhiana

Er. Kuldeep Singh, SEE, ZO-2, Ludhiana

Er. Nikhil Gupta, EE, ZO-2, Ludhiana

On behalf of SPV

Sh. Lalit Jain, Director

Sh. I.K. Kapila, Advocate, Hon'ble Supreme Court of India

Environmental Engineer, Zonal Office-2, Ludhiana brought out that Bahadur Ke Textile Knitwear Association (SPV for CETP) has installed and is operating the Common Effluent Treatment Plant (CETP) of capacity 15 MLD for treatment of waste water from the cluster of textiles dyeing industries located at Bahadur Ke Road in Ludhiana.

Earlier the SPV was granted consents to operate under Water (Prevention and Control of Pollution) Act, 1974 vide no. CTOW/Renewal/LDH3/2022/18251904 dated 05.07.2022 and Air (Prevention & Control of Pollution) Act, 1981 vide no. CTOA/Varied/LDH3/2023/20380901 dated 25.04.2023, to operate the CETP of capacity 15 MLD for the treatment of effluent generated from dyeing industries located at Bahadurke Road, Ludhiana, both the consents had expired on 04.01.2023 and 31.03.2024 respectively.

Since the inception and commissioning, the SPV of 15 MLD capacity is being pursued by the Board from time to time for the compliance of the provisions of environmental laws especially the Water (Prevention and Control of Pollution) Act, 1974 by way of issuing notices, requests, reminders and affording of opportunities of hearing before the Competent

Authority. The officers of the Board are also carrying out the monthly monitoring of the Common Effluent Treatment Plant since the commissioning of the CETP.

The SPV, BKTKA was given personal hearing before the Chairman of the Board on 16.06.2023 u/s 33-A of Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988 for non-achievement of effluent discharge standards at final outlet of CETP-15 MLD. After hearing the representations of the SPV and the officers of the Board and considering the relevant facts of the case, the Chairman of the Board has decided as under:

1. SPV shall submit a time bound proposal for up-gradation and augmentation of the CETP along with PERT Chart so as to achieve the prescribed standards as well as the standards as mentioned in the DPR appraised at the time of approval of financial aid received from, the Government for this CETP, within 30 days.
2. SPV shall submit a time bound proposal for 2nd Phase of up-gradation of CETP to ZLD along with PERT Chart as per the condition of Environmental Clearance granted by MoEF&CC, within 30 days.
3. SPV shall take all necessary measures to reduce the concentration of various pollutants at source including pretreatment in the member units wherever required so as to meet with inlet standards of DR at CETP and issue necessary directions to this effect to the member units.
4. Till the up-gradation of CETP, SPV shall operate the existing CETP with best of its ability, adequately and efficiently so as to achieve the prescribed standards.
5. SPV shall also work on the removal of colour at the final outlet of the CETP to achieve the desired standards as well as to the visual satisfaction.
6. SPV shall submit the performance bank guarantee of remaining amount after deduction of the EC i.e.  $(2,40,00,000 - 77,62,500 = 1,62,37,500)$  of Rs. 1,62,37,500/-, within 15 days.
7. SPV shall get installed SCADA enabled flow meters with all the member units at intake supply (submersible pumps / MC supply / other sources) having connectivity with the Online Monitoring System of CETP and access to Punjab Pollution Control Board, within one month to ensure that no bye-pass of effluents is being operated by them. Till the installation of online meters, the industry shall must have EMF or mechanical meter at intake supply for which record is to be maintained on day to day basis.
8. SPV shall provide flow meter, CCTV cameras and Online Monitoring Mechanism at its final outlet leading to Buddha Nallah, within one month.
9. Environmental Compensation for the period of 20.04.2022 to 11.05.2023 (date of last sampling) shall be imposed on the SP for not operating the CET properly and efficiently resulting in non-achievement of results. Regional Office-3, Ludhiana to calculate the amount of Environmental Compensation and obtain necessary approvals.

10. Legal action against the SPV (CETP 15 MLD, Bahadur Ke Road, Ludhiana) and its Directors (M/s Bahadur Ke Textile & Knitwear Association (SPV) as well as CETP operator be initiated in the Competent Court of Jurisdiction.

The SPV has not complied with the decisions of the hearing mentioned above from serial no.1 to serial no. 06 as the SPV has neither submitted any proposal to adopt ZLD nor submitted bank guarantee of remaining amount after deduction of the EC.

The CETP of capacity 15 MLD installed at Bahadurke Road, Ludhiana for the treatment of effluent generated from the dyeing industries of Bahadurke cluster is fully operational since July 2020 and CETP is being regularly monitored by the Board on monthly basis. The CETP has failed to achieve the stringent discharge standards prescribed by the Board for the CETP since its commissioning.

The SPV had applied for renewal of consent to operate under Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution) Act, 1981 and accordingly, CETP 15 MLD was visited by officer of the Board on 11.04.2024 and it was observed as under:

1. CETP was in operation for the treatment of effluent generated from the member dyeing industries. DAF was also in line and operational.
2. CETP had recently added 03 new sludge de-watering machines alongwith 02 existing sludge centrifuge pumps and these newly installed 03 machines were in operation and existing 02 were in standby mode.
3. The recently added 01 wood fired boiler of capacity 01TPH with cyclone separator as an APCD alongwith steam paddler drier was also in operation.
4. During visit effluent was collected and sent to the Board's lab for analysis, as per the analysis report CETP is achieving the discharge standards prescribed by the MoEF&CC except one parameter i.e. TDS but it has failed to achieve stringent discharge standards prescribed by the Board.
5. CETP is complying with the provisions of the Air (Prevention & Control of Pollution) Act, 1981.

The SPV has failed to comply with the decisions taken during the personal hearing dated 16.06.2023 and to achieve stringent effluent discharge standards. Thus, the SPV was found violating the provisions of the Water (Prevention & Control of Pollution) Act, 1974.

The SPV was granted Environmental Clearance vide MoEF&CC letter dated 08.12.2014 for the establishment of CETP based on Zero Liquid Discharge (ZLD). Thereafter a follow up meeting of Appraisal Committee on CETP was held in the MoEF&CC on 03.03.2016 and during the meeting it was decided that the SPV shall install CETP based on conventional treatment method in 1st phase and may adopt ZLD in 2nd phase. Minutes of the said meeting

were issued vide MoEF&CC letter dated 18.03.2016, but the SPV has not submitted any proposal till date to adopt 2nd phase i.e. ZLD.

The SPV has filed appeals before the Appellate Authority-cum-Secretary to Government of Punjab, Department of Science Technology and Environment against following decisions of the Board:

1. Imposition of EC amounting to Rs. 01 crore to the SPV vide minutes of meeting dated 08.10.2021.
2. Imposition of EC amounting to Rs. 77.625 Lacs to the SPV vide Board's no. 335 dated 4.10.2022
3. Against the decision of the Board to obtain Performance Bank Guarantee of Rs. 2.4 Crores from the SPV.

However, above appeals filed by the SPV were decided and dismissed by the Appellate Authority-cum-Secretary to Government of Punjab, Department of Science, Technology and Environment vide orders dated 20.05.2024.

Environmental Compensation (EC) amounting to Rs.1 crore has already been deposited by the SPV and EC amounting to Rs.77.625 lacs has been recovered from the amount of performance bank guarantee of Rs. 2.4 crore earlier submitted by the SPV. However, the SPV has not submitted performance bank guarantee of remaining amount after deduction of the EC amounting to Rs. 77.625 Lac by the Board i.e.  $(2,40,00,000 - 77,62,500 = 1,62,37,500)$  till date. The appeal filed by the SPV against this BG has already been dismissed by the Appellate Authority.

The SPV is not complying with the decisions of the Competent Authority.

Show cause notice for refusal of consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 was issued to the SPV with an opportunity of personal hearing before the Chairman of the Board on 09.07.2024 postponed to 12.07.2024, postponed to 16.07.2024 and postponed to 23.07.2024. No one on behalf of SPV attended the hearing. Considering the request of the SPV, the hearing was further postponed to 09.08.2024. However, no one on behalf of SPV again attended the hearing on 09.08.2024.

Keeping in view the act and conduct of the SPV, it was observed that the SPV is not serious about resolving the issues / violations reported on part of the CETP and SPV is not attending the hearing being afforded by the Board to avoid the implementation of the provisions of Environmental Laws. After considering all the aspects of the case, the Chairman of the Board decided to proceed ex-parte and has taken the following decisions:

1. The consent to operate applied by the SPV under the Water (Prevention & Control of Pollution) Act, 1974 be refused as ex-parte decision.
2. Notice to issue directions u/s 33-A of the Water Act, 1974 to take measures to control the pollution generated by the CETP, which may include taking legal action against the

responsible persons of the SPV, to stop the transaction of the bank account of SPV with immediate effect, to impose the appropriate Environmental Compensation based on polluter pays principle and to upgrade the existing CETP to the ZLD, be issued to the SPV alongwith an opportunity of personal hearing before the Chairman of the Board.

The proceedings were conveyed to the SPV vide Board's letter no. 5336-37 dated 29.08.2024.

In compliance to the decisions of hearing the consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 was refused vide no. CTOW/Renewal/LDH3/2024/25302219 dated 30.08.2024.

In compliance of directions of the Central Monitoring Committee (CMC), CPCB has carried out inspection and monitoring of the Buddha Nallah and River Sutlej on 02.04.2024. The CPCB has also carried out inspection of 04 CETPS located at Ludhiana on 22.04.2024 and issued directions u/s 18(1)(b) of the Water (Prevention and Control of Pollution) Act, 1974 regarding non-compliance of four CETPs of Ludhiana. The CETP of capacity 15 MLD was visited by the team of CPCB and following observations were made:

1. During the visit on 22.04.2024, the CETP was found operational with the flow rate of 11.26 MLD. The CETP receives effluent through dedicated underground pipeline and the treatment is based on Sequential Batch Reactor (SBR) technology. It was informed that the CETP is discharging the treated effluent into Buddha Nallah (which meets River Sutlej) through underground pipeline from the CETP. However, as per EC issued by MoEF&CC on 08.12.2014, the CETP is required to establish a Zero Liquid Discharge system.
2. The consent under the Air Act, 1981 is valid upto 31.03.2025 for the operation of 15 MLD CETP. However, the consent under the Water Act, 1974 was valid till 04.01.2023 and the Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 was valid till 04.10.2022 for which the CETP has applied for renewal to PPCB.
3. During visit, it was informed to the team that 36 Dyeing/Printing/washing units had obtained membership from CETP and connected to the CETP.
4. Grab samples were collected from the CETP during monitoring. The analysis results of sample collected from CETP outlet reveals thats B OD: 243 mg/l (Standard: 30 mg/l), COD: 587 mg/l (Standard: 250 mg/l), Chloride: 1904 mg/l (Standard: 1000 mg/l) and Sulphide: 16 mg/l (Standard: 2 mg/l) exceeds the notified effluent discharge standards for CETP. Remaining monitored parameters were found within the prescribed standards.
5. Further, the grab samples were collected from the Sequential Batch Reactor (SBR) tank for MLSS & MLVSS. The sample analysis results reveals that the concentration of MLSS: 2639 mg/l (Designed value: 4840 mg/l) and concentration MLVSS: 1179 mg/l (Designed



value: 3872 mg/l) are less than the designed values, which indicates the poor operation of the SBR.

6. The CETP has installed Online Continuous Effluent Monitoring System (OCEMS) at the final outlet of treated effluent for the parameters pH, TSS, COD, BOD with connectivity to PPCB & CPCB servers. During the visit, the OCEMS was found operational and variation in OCEMS reading compared with the monitored results was also reported which indicates the improper working / validation / calibration of OCEMS system.
7. During the visit, it was observed that the CETP has provided sludge storage facility and obtained membership from M/s Re-sustainability Limited (M/s Ramky Enviro Engineers Limited) for disposal of sludge. The CETP had disposed 602.685 MT Sludge during the period of 02.04.2023 to 31.03.2024, through TSDF.

The SPV is violating the provisions of the Water (Prevention & Control of Pollution) Act, 1974.

Environmental Engineer, Zonal Office-2, Ludhiana brought out that in light of deficiencies as observed by CPCB in operation of the CETPs of Ludhiana installed for dyeing units on its visit on 22.04.2024, the Central Pollution Control Board has issued directions u/s 18/1(b) of the Water (Prevention & Control of Pollution) Act, 1974 vide letter dated 12.08.2024 to take appropriate action including imposing Environmental Compensation and to ensure that the CETP is operated ensuring:

- d) Operation/ augmentation of the treatment system, appropriately, so as to meet the prescribed discharge standards and to comply with the disposal condition mentioned in the Environmental Clearance by MoEF&CC dated 03.05.2013 and 08.12.2014 in the aforesaid 40 MLD, 50 MLD & 15 MLD CETPs. Further, to stop discharging of treated effluent into Buddha Nallah from 50 MLD, 40 MLD & 15 MLD CETPs.
- e) With valid consent under the Water Act, 1974/ Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 from PPCB and comply with all the conditions mentioned thereof.
- f) Undertaking regular calibration, maintenance and validation of the OCEMS analysers as per standard operating procedures/recommendations of the suppliers, so as to ensure generation of continuous & reliable data.

Punjab Pollution Control Board was further directed by Central Pollution Control Board as under:

- d. To prescribe disposal condition to respective CETPs in accordance with the Environmental Clearance by MoEF&CC dated 03.05.2013 & 08.12.2014.
- e. To prescribe inlet standards for CETP in accordance to the CETP notification dated 01.01.2016.

f. To regularly undertake verification of member industries of the CETP for ensuring proper operation of PETP/ETP by individual member industry.

Notice to issue directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988 was issued to the SPV with an opportunity of personal hearing before Chairman of the Board on 13.09.2024 postponed to 18.09.2024.

Sh. Lalit Jain, Director of the SPV (CETP of 15 MLD) alongwith Sh. I.K. Kapila, Advocate, Hon'ble Supreme Court of India attended the hearing and submitted a written reply which was taken on record. The representatives stated that although the EC was obtained by the SPV for ZLD based treatment but later on the project was conceived on the SBR based secondary level treatment. The representatives further contended that other two CETPs of 40 MLD & 50 MLD capacity were duly sanctioned without any condition / requirement for ZLD level treatment. Regarding the submission of Bank Guarantee as per decision of personal hearing afforded to the SPV by Chairman of the Board on 16.06.2023, the representatives informed that the SPV has challenged the said decision by way of filing appeal before the Appellate Authority and the decision is pending. The representatives disagreed with the technical observations as reported by the CPCB and did not find the same acceptable to the SPV and insisted not to penalize the SPV on the basis of the said report. The representatives further informed that the SPV has applied for obtaining the consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 with the Board.

During hearing, it was observed by the Competent Authority that the SPV has been constantly pursued by the Board to submit proposal for upgradation of the CETP to ZLD technology in consonance with the EC conditions and thus not to discharge its effluent into the Buddha Nallah. However, the SPV has not taken any step in this direction. The Ludhiana city has been declared as critically polluted area due to various reasons and one of the reasons is the activities of the industrial units in violation of the environmental norms. Though the Board has imposed EC and performance Bank Guarantee but the SPV is still violating the provisions of the Water (Prevention and Control of Pollution) Act, 1974.

The representatives of the SPV could not give any satisfactory reply to the observations raised during the hearing.

After detailed deliberations and hearing the representatives of SPV, officers of the Board and taking into consideration various factors including the seriousness of the issue, the Chairman of the Board observed that the objective to restrain the discharge of effluent into Buddha Nallah cannot be achieved except with the issuance of directions. It is a fit case to invoke the provisions of section 33-A of the Water (Prevention and Control of Pollution) Act, 1974 for issuance of suitable directions to the SPV operating the CETP of 15 MLD capacity at Bahadurke Road, Ludhiana. Hence, the Chairman of the Board in exercise of the powers conferred u/s 33-A of the Water (Prevention and Control of Pollution) Act, 1974 decided to issue the following directions to the SPV of CETP of 15 MLD capacity:

1. The SPV shall ensure that the operation / augmentation of treatment system of CETP is appropriately made, so as to meet with the prescribed discharge standards and to comply with the disposal conditions mentioned in the Environmental Clearance granted by the Ministry of Environment, Forest and Climate Change dated 08.12.2014.
2. The SPV shall immediately stop the discharge of effluent from the CETP of 15 MLD capacity into Buddha Nallah or any other surface water body.

Apart from the issuance of directions u/s 33-A of the Water (Prevention and Control of Pollution) Act, 1974 to the SPV of 15 MLD CETP the concerned Environmental Engineer of Regional Office-3, Ludhiana may also be directed by making endorsement of the above order to carry out the following actions:

- a. To calculate the Environmental Compensation since the start of CETP considering continued violations being committed by the SPV by way of discharging its effluent into the Budha Nallah in violation of the conditions of Environmental Clearance granted by the Ministry of Environment, Forest and Climate Change by adjusting the period / amount of the EC already imposed by the Board and deposited by the SPV.
- b. To process the consent application of the SPV pending with the Board, immediately on merits.

To personally ensure the compliance of above said decisions and submit report with recommendations without any delay.

You are, therefore, requested to comply with the decisions of the personal hearing within stipulated period and submit compliance report to the Board.

Endst. No. 5800.....

For and on behalf of  
Punjab Pollution Control Board  
Dated 25.09.24

A copy of the above is forwarded to the Member Secretary, Central Pollution Control Board, Parivesh Bhawan, New Arjun Nagar, Delhi- 110032 for kind information & necessary action, please.

Endst. No. 5801.....

For and on behalf of  
Punjab Pollution Control Board  
Dated 25.09.24

A copy of the above is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana for information & necessary action.

For and on behalf of  
Punjab Pollution Control Board