

Speed Post

B-400(T/PC)/IPC-III/2020-21 2056

July 01, 2020

To,

The Chairman,
Gujarat Pollution Control Board,
Paryavaran Bhavan,
Sector-10A, Gandhinagar-382 043

Directions under Section 18(1)(b) of the Water (Prevention & Control of pollution) Act, 1974 and Air (Prevention & Control of pollution) Act, 1981 in the matter of M/s Mukesh Industries Ltd., Opp. Avatar Hotel, Narol-Naroda road, Narol, Ahmedabad – 382405

WHEREAS, among others, under Section 17 of the Water (Prevention and Control of Pollution) Act, 1974, one of the functions of the State Pollution Control Board (SPCB)/ Pollution Control Committee (PCC), constituted under the Water (Prevention and Control of Pollution) Act, 1974 is to plan a comprehensive programme for prevention, control of abatement of pollution streams and wells located in the State/UT and to secure the execution there; and

WHEREAS, the Central Government has notified the standards for discharge of environmental pollution from various categories of industries under Environment (Protection) Act, 1986 and the rule framed there under; and

WHEREAS, the CPCB and SPCBs have been pursuing the polluting industries to install effluent treatment plants (ETPs) to comply with the effluent discharge standards as notified under the Environment (Protection) Act, 1986 and the rule framed there under; and

WHEREAS, the SPCBs/PCCs can stipulate stringent standards for discharge of environmental pollution from various categories of industries than those notified by the Central Government, under the Environment (Protection) Act, 1986 and rules framed there under; and

WHEREAS, the inspection of M/s Mukesh Industries Ltd., Opp. Avatar Hotel, Narol-Naroda road, Narol, Ahmedabad – 382405 (hereinafter referred as 'the Unit') was carried out on 12.03.2020 by the team from CPCB, Regional Directorate, Vadodara for compliance verification in respect of public compliance received. The unit was engaged in processing of grey fabric i.e. cotton or polyester fabric into finished textiles. Following are the major observations of the team regarding the unit and general profile of the area during the visit:

1. The unit was found operational during inspection on 12.03.2020. The industry has Consolidated Consent & Authorization (CC&A) issued by GPCB for processing 23,00,000 meter/month of processing of cloth which expired on 07.07.2018. Further it was informed that consideration for renewal of CC&A is pending at GPCB.
2. The industry has 02 no. of bore wells within the premises as source of water. The unit has not obtained Central Ground Water Authority (CGWA) permission.
3. The various unit operations & processes of ETP are; Process effluent & boiler blow-down →Rotating drum screen →Collection tank →Rectangular channel (HCl, AlCl₃ & Poly-electrolyte dosing in series) →Distribution channel →Parallel feed to Primary clarifier – 1, 2 & 3 →Biological treatment system (Activated Sludge Process) →Secondary clarifier

→Treated effluent collection tank - 1 & 2 (interconnected) →Common sump no. 2-A of M/s NTIEM →CETP - NTIEM, Narol→River Sabarmati.

4. During inspection, grab effluent samples were collected from final outlet of ETP and inlet to ETP. Analysis results of the effluent samples are depicted in the below table and compared with the norms prescribed in CC&A.

S. no.	Parameters	Source of sampling and concentration of pollutants		GPCB norms
		Inlet to ETP	Final outlet of ETP	
1.	pH	9.29	7.57	6.5 - 8.5
2.	SS	68	24	100
3.	TDS	4960	3153	2100
4.	COD	2035	153	100
5.	BOD	744	36	30
6.	NH3-N	128	2.8	50
7.	O & G	--	0.82	10

Note: Concentration of all the parameters is expressed in mg/L, except pH.

Analysis results of the treated effluent sample collected from final outlet of ETP reveals that concentration of parameters viz. TDS (3153 > 2100 mg/L); COD (153 > 100 mg/L) and BOD (36 > 30 mg/L) were found exceeding the GPCB prescribed norms.

5. Emission sample was collected from the common stack of thermic fluid heater and steam boiler. Analysis results of the sample is depicted in the below table and compared with the norms prescribed in CC&A.

Source of sampling	Parameters		
	PM, mg/Nm ³	SO ₂ , ppm	NO _x , ppm
Source emission from common stack attached to thermic fluid heater and steam boiler	73.7	30.98	114.1
GPCB norms	150	100	50

Analysis results of the source emission sample collected from common stack attached to thermic fluid heater and steam boiler reveals that concentration of NO_x: (114.1 > 50 ppm) is exceeding the GPCB prescribed norms.

6. During the visit, one abandoned collection tank near ETP was found half filled with thick layer of scum and sludge.
7. Stack monitoring platform (work platform) of common stack of unit was found inadequate w.r.t. width, work clearance etc. as per Emission Regulation (Part III). Also, the location of monitoring port hole is in close proximity to the point of joining of the duct.
8. The unit has not provided adequate system for collection, handling, storage of fly ash and bottom ash.
9. Closed belt conveyor system is provided for conveyance of coal and bucket elevator, however coal crusher is not provided with Emission Control Systems (ECS). During routine operation, fugitive emissions from coal crusher and transfer point junctions can't be ruled-out.
10. The industries in Narol textile cluster have made application to CGWA for grant of NOC to extract ground water. However, it is observed that No objection certificate (NOC) has not been granted to any industries.
11. Most of the industries are granted CC&A with a condition to discharge partially treated effluent to Ahmedabad Textile Processor's Association (ATPA) pipeline for final disposal into River Sabarmati after proportionate mixing with treated domestic wastewater from Pirana

- STP of Ahmedabad Municipal Corporation so as to achieve TDS concentration below 2100 mg/L. Whereas after commissioning of Common Effluent Treatment Plant (CETP) – M/s NTIEM, Narol, the industries are discharging partially treated effluent to CETP – NTIEM, Narol through common sump(s) for further treatment and discharge into River Sabarmati.
12. As per GPCB OM dated 26.02.2020 utilization of spent AlCl₃, HCl and H₂SO₄ by end-users in general textile industries and CETP's are permitted under certain circumstances. However, except invoice records of procurement; the manifest document was not found in order. Hence, it is difficult to ensure the environmentally sound handling & utilization of hazardous waste as a resource.
 13. The industries have not provided adequate mechanism for collection and handling of fly ash from emission control system, bottom ash from boilers & thermic fluid heaters.
 14. The approach roads within Narol textile cluster especially in Isanpur area are mostly unpaved. Due to unauthorized and haphazard disposal of ash outside the premises by the industries, substantial evidences of re-suspension of ash and dust was observed due to frequent movement of commercial vehicles. Hence, time bound action plan for environmentally sound utilization of fly ash should be expedite at Narol textile cluster.

WHEREAS, CPCB issued following directions on 03.03.2017 under Section 18 (1) (b) of the Water Act, 1974 and the Air Act, 1981 in the matter of pollution control in 17 category of highly polluting industries and Red, Orange & Green (ROG)- regarding self monitoring of compliance to all State Pollution Control Boards (SPCBs)/PCCs:

1. That SPCBs/PCCs shall direct all such units (Orange, Red & Green category) not to continue their operations till the units obtain valid consent to operate (CTO) from the SPCB/PCC.
2. SPCB/PCC shall place names of all such defaulter units on its website and issue notices under Water and Air Act to seek consent and comply with stipulated standards.

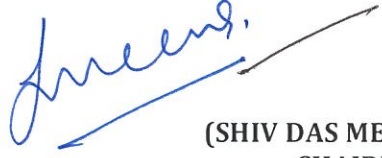
WHEREAS, CPCB also issued Directions dated 22.09.2017 u/s 18(1)(b) of Water (P&C of Pollution) Act, 1974 and Air (P&C of Pollution) Act, 1981 to GPCB in the matter of 'Excessive pollution due to textile processing units located in Piplej-Narol area of Ahmedabad'.

NOW THEREFORE, in view of the above and in exercise of the powers conferred under section 18 (1) (b) of the Water (Prevention and Control of Pollution) Act, 1974, and Air (Prevention and Control of Pollution) Act, 1981 GPCB is directed to comply following directions:

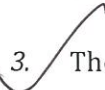
1. To provide the present status of CC&A renewal application dated 1/07/019 & 21.08.2019 submitted by the unit M/s Mukesh Industries Ltd., Opp. Avatar Hotel, Narol-Naroda road, Narol, Ahmedabad and the reasons for delay in processing the said renewal application.
2. To provide the reason for prescribing stringent emission norms for the SO₂(100 mg/l) & NO_x parameters (50mg/Nm³) and stringent effluent norms for COD (100 mg/l) to the said unit. The notified norms under E(P) rules,1986 for the SO₂ , NO_x & COD are 600 mg/Nm³,300 mg/Nm³ & 250 mg/l respectively.
3. To verify that the industries operating in the Narol Textile cluster are now a member of Narol-CETP & accordingly issue amendments in CC&A of member units of Narol-CETP including said unit to ensure uniform terms & conditions of treatment i.e permitting CETP as mode of disposal & achieving CETP inlet standards as wastewater discharge norms.

4. To explore possibility of recycling of the treated CETP effluent up to the maximum extent for reuse in industrial process or other alternate source of fresh water for production and domestic activities till the grant of NOC from CGWA to industries.
5. To ensure that no unit (Orange, Red & Green category) continue their operations without valid consolidated consent & Authorization (CC&A) orders to operate from the GPCB.
6. To hold interaction meeting with all concerned stakeholders and develop an action plan for effective implementation of Waste Management Rules 2016 & paving of roads at Narol Textile cluster.
7. To provide the updated compliance status of CPCB Directions dated 22.09.2017 u/s 18(1)(b) of Water (P&C of Pollution) Act, 1974 and Air (P&C of Pollution) Act, 1981 issued to GPCB in the matter of 'Excessive pollution due to textile processing units located in Piplej-Narol area of Ahmedabad'.

The time bound action taken report shall be submitted to CPCB within 30 working days from the date of receipt of these directions.


(SHIV DAS MEENA)
CHAIRMAN

Copy to:

1. **The Regional Director,**
CPCB Regional Directorate,
Parivesh Bhawan; Opp. VMC Ward Office No. 10,
Subhanpura, Vadodara-390 023
: For information, pl.
2. **The Incharge, (CP Division),**
Ministry of Environment, Forests & CC,
Prithvi Block, Indira Paryavaran Bhawan,
Jorbagh Road, New Delhi - 110 003
: For information, pl.
3.  The Div. Head, IT Division, CPCB Delhi
: For uploading the direction in CPCB's
website please
4. The Div. Head, IPC-III Division, CPCB Delhi
: For records purpose.


(PRASHANT GARGAVA)
MEMBER SECRETARY