



**Speed Post**

B-190188/CETP-Jajmau/PIAS/WQM-II/CPCB/2018-19/ 1882

Date : 08/05/2019  
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To,

The Chairman  
Uttar Pradesh Pollution Control Board,  
Building No. TC-12V, Vibhuthi Khand,  
Gomti Nagar,  
LUCKNOW – 226 010

**DIRECTIONS UNDER SECTION 18 (1) (b) OF THE WATER (PREVENTION AND CONTROL OF POLLUTION) ACT, 1974 – TANNERY UNITS IN KANPUR- reg.**

**WHEREAS**, the Central Pollution Control Board, has delegated powers vested under Section 18 (1) (b) of the Water (Prevention & Control of Pollution) Act, 1974 to the Chairman, Central Pollution Control Board vide its resolution made on 133<sup>rd</sup> Board meeting item no. 3.12 dated 24<sup>th</sup> March, 2005 to issue directions under Section 18 (1) (b) of the Water (Prevention & Control of Pollution) Act, 1974 to the State Pollution Control Board; and

**WHEREAS**, amongst 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), 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 thereof; and

**WHEREAS**, amongst others, under section 16 of the Water (Prevention and Control of Pollution) Act, 1974, one of the functions of the Central Pollution Control Board (CPCB), constituted under the Water (Prevention and 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 to promote cleanliness of streams and wells in different areas of the States; and

**WHEREAS**, under Section 25 of the Water (Prevention and Control of Pollution) Act, 1974 no person shall, without the previous consent of the State Pollution Control Board establish or take steps to establish any industry, operation, or process or any treatment or disposal system or an extension or addition thereto, which is likely to discharge sewage or trade effluent into a stream or well or sewer or on land; and

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

**Whereas**, CETP at Jajmau, Kanpur needed upgradation as the CETP was not able to comply with all parameters of the stipulated norms; and

**Whereas**, in view of the upgradation requirement of the three CETPs of tannery clusters at Jajmau, Kanpur, UPSIDC Industrial Area Site-II, Unnao and UPSIDC Leather Technology Park, Banthar, Unnao and general problem of non-compliance of primary effluent treatment plant discharge standards by tanneries, CPCB issued directions under section 18 (1) (b) of the Water Act 1974 on 28/10/2014 to U. P. Pollution Control Board (UPPCB) as below:

1. *To direct tanneries and CETPs to submit a time bound action plan within 3 months for –*
  - a) *upgradation and proper operation of CETPs within one year to attain compliance of surface water disposal norms in the final effluent, including TDS, and*
  - b) *upgradation and proper operation of PETPs within 6 months to attain compliance of primary treatment standards/ CETPs design inlet parameters.*
2. *To direct closure of tanneries if satisfactory compliance of the above is not observed within 3 month*
3. *To develop a mechanism to keep under close watch all tanneries for ensuring regular compliance of i) prescribed primary treatment standards / CETPs' design inlet parameters and ii) wastewater generation standards / permitted wastewater capacity.*

**And Whereas**, UPPCB issued directions under section 33 (A) of the Water Act 1974 to occupier of three CETPs - Directions dated 25/11/2014 to the CETP at Jajmau, Kanpur, and Directions dated 01/01/2015 to the two CETPs at UPSIDC Industrial Area Site-II, Unnao and UPSIDC Leather Technology Park, Banthar, Unnao, as below:

1. *To submit a time bound action plan within 3 months to attain compliance of primary treatment standards and upgradation and proper operation of CETP within 1 year to attain compliance of surface water disposal norms in the final effluent, including TDS*
2. *To submit a time bound proposal for installation of Online Monitoring System within 3 month*
3. *To submit a time bound proposal for up grading and achieving Zero Liquid Discharge (ZLD) for CETP within three months.*

**And Whereas**, CPCB issued Show Cause Notice dated 31.03.2016 under section 5 of the Environment Protection Act, 1986 to all member units of CETP, Jajmau, Kanpur through its occupier/operator directing them to show cause within 15 days as to why Directions be not issued to close their manufacturing operations and disconnecting their electricity supply till the CETP is upgraded so as to comply with standards, including those related to primary treatment; and

**Whereas**, CPCB issued directions under section 5 of the Environment (Protection) Act, 1986 on 14/07/2016 to all member units of CETP, Jajmau, Kanpur through its occupier/operator to comply with the following directions:

- a) *To submit proof of being a member of the SPV to undertake or participate in the needed improvement of the CETP and submit undertaking to participate in the improvement of the CETP,*
- b) *To submit a plan to improve the CETP to ensure compliance of all parameters including TDSi/ FDS in treated effluent at the outlet of CETP with firm time schedule, not exceeding beyond June, 2017 for completing the same.*

**And Whereas,** two associations of member units of CETP, Jajmau, Kanpur, 'Small Tanners Association' and 'U.P. Leather Industries Association' have replied collectively on 02/08/2016 about the preparation of DPR for improvement of CETP to ensure compliance of all parameters in effluent however no firm time schedule has been committed; and

**Whereas,** The Hon'ble Supreme Court in the writ petition (c) no. 375 of 2012 pronounced judgement dated 22/02/2017 and issued directions as follows:

1. *The setting up of 'common effluent treatment plants' should be taken up as an urgent mission. CETPs which are already under implementation should be completed within the lines already postulated. CETPs which are yet to be set up, concerned State Governments/ Union Territories were directed to complete the same within three years from today (i.e. 22/02/2017).*
2. *While acquiring lands for setting up of 'common effluent treatment plants' concerned State Governments will acquire such additional land as may be required for setting up "zero liquid discharge plants" as and when required in future.*
3. *Government (or the Union Territories), shall cater to the financial requirement, of running the CETPs, which are presently dis-functional, from their own financial resources.*
4. *For setting up CETPs, the concerned State Governments (or the Union Territories) will prioritize such cities, towns and villages, which discharge industrial pollutants and sewage, directly into rivers and water bodies.*
5. *The directions pertaining to continuation of industrial activity only when there is in place a functional primary ETP, and the setting up of functional CETPs, within the time lines, shall be of the Member Secretaries of the concerned Pollution Control Boards. The Secretary of the Department of Environment, of the concerned State Government (and the concerned Union Territory), shall be answerable in case of default. The concerned Secretaries to the Government shall be responsible of monitoring the progress, and issuing necessary directions to the concerned Pollution Control Board, as may be required, for the implementation of the above directions.*
6. *Some of the CETPs are dis-functional, because of lack of finances. Onus to operate the existing CETPs, rests on concerned Municipalities (and / or Local Bodies), cannot be permitted to shy away, from discharging this onerous duty.*
7. *The norms for generating funds, for setting up and / or operating the CETP shall be finalized, on or before 31.3.2017, so as to be implemented w.e.f. the next financial year.*

**And Whereas,** joint monitoring of CETP, Jajmau, Kanpur was carried on 15.02.2018 by a joint team of officials from CPCB & UPPCB and the following observations were made:

1. CETP was operational on the day of inspection.
2. Flow measured at CETP was 27 MLD (8.89 MLD Tannery effluent + 18.21 Sewage).
3. Analysis results of samples collected from CETP inlet & outlet to verify the status of compliance are as under:

Sl no.	Parameters	CETP Inlet		CETP Outlet	
		Mixing tank	Outlet	Standards	
	pH	8.10	7.77		6.0-9.0
	TSS	546	113		100
	FDS	5345	4423		2100
	BOD	752	335		30
	COD	1236	820		250
	Sulphide as S	-	165		2.0
	Total Cr				2.0

**Note:** All values are expressed in mg/l except pH

4. CETP was **non-complying** w.r.t. stipulated discharge standards of **TSS, FDS, BOD, COD, Sulphide**.

**And Whereas,** CETP, Jajmau, Kanpur was inspected by Joint team of officials from CPCB and UPPCB on 22/05/2018 and the following observations were made:

1. CETP was operational on the day of inspection.
2. On the day of inspection quantity of sewage received at CETP was 19 MLD and tannery effluent was in the range of 8-9 MLD. This indicates that the designed blending ratio of 1:3 (tannery effluent to sewage) was not maintained.
3. Treated effluent from CETP is discharged into an irrigation canal.
4. Analysis results of samples collected from CETP inlet & outlet to verify the status of compliance are as under:

Sl no.	Parameters	CETP Inlet			CETP Outlet	
		Inlet of tannery effluent	Inlet of sewage	Mixing tank	Outlet	Standards
1	pH	7.85	7.50	7.45	7.76	6.0-9.0
2	TSS	1750	560	711	253	100
3	FDS	9213	2016	3673	3884	2100
4	BOD	1265	238	412	420	30
5	COD	2601	829	1345	785	250
6	Sulphide as S	62.5	BDL	45.1	139	2.0
7	Total Cr	130	2.33	19.8	8.89	2.0

**Note:** All values are expressed in mg/l except pH; TC & FC values are in nos. /100ml.

5. CETP was **non-complying** w.r.t. stipulated discharge standards of **TSS, FDS, BOD, COD, Chloride, Sulphide and Total Chromium**.
6. Effluent receiving at CETP inlet was also not meeting the desired inlet quality. Analysis result of CETP inlet sample of tannery effluent (Primary treated effluent of tanneries) shows **Total Chromium – 130 mg/l and TSS - 1750 mg/l (against Primary Effluent Treatment Plant (PETP) discharge norms of Total Chromium 2.0 mg/l and TSS 600 mg/l)**.

**Whereas,** UPPCB in June/July 2018 directed tannery units at Jajmau, Kanpur to operate at 80% of allowed capacity to make the generated effluent compatible with CETP; and

**And Whereas,** CETP, Jajmau, Kanpur was inspected by Joint team of officials from CPCB and UPPCB jointly on 16/08/2018 and following observations were made:

1. CETP was operational on the day of inspection.
2. On the day of inspection quantity of sewage received at CETP was 8.17 MLD and tannery effluent was 7 MLD. This indicates that the designed blending ratio of 1:3 (tannery effluent to sewage) was not maintained.
3. Treated effluent from CETP was being discharged into an irrigation canal.
4. Analysis results of samples collected from CETP inlet & outlet to verify the status of compliance are as under:

Sl no.	Parameters	CETP Inlet			CETP Outlet	
		Inlet of Tannery effluent	Inlet of sewage	Mixing tank	Outlet	Standards
	pH	8.91	7.65	7.82	8.06	6.0-9.0
	TSS	3142	715	964	195	100
	FDS	3191	-	3347	2292	2100
	BOD	1694	-	-	-	30
	COD	3288	-	-	-	250
	Sulphides as S	-	-	47.8	91.3	2.0

5. CETP was **non-complying** w.r.t. stipulated discharge standards of **TSS, FDS, and Sulphide**.
6. Effluent receiving at CETP inlet was also not meeting the desired inlet quality. Analysis result of a CETP inlet sample of tannery effluent (Primary treated effluent of tanneries) showed **TSS - 3142 mg/l (against Primary Effluent Treatment Plant (PETP) discharge norms of TSS 600 mg/l)**.

**Whereas**, UPPCB issued direction dated 15<sup>th</sup> December, 2018 under section 32 (1) (C) of the Water Act 1974 to stop operations to all tanneries connected with CETP Jajmau, except 28 tanneries; and

**Whereas**, CETP, Jajmau, Kanpur was inspected by team of officials from UPPCB on 19.03.2019. and following observations were made:

1. CETP was operational on the day of inspection.
2. Analysis results of samples collected from CETP inlet & outlet to verify the status of compliance are as under:

Sl no.	Parameters	CETP Inlet	CETP Outlet	
		Inlet of tannery effluent	Outlet	Standards
1	pH	8.39	7.76	6.0-9.0
2	TSS	576	74	100
3	BOD	402	270	30
4	COD	1055	656	250
5	O&G	105	37.8	10
6	Total Cr	22.4	2.38	2.0

3. It is reported that only 28 tanneries are operational and industry effluent on the day of inspection was 11 MLD tannery effluent & 27 MLD Sewage which indicates that;
  - i. Either more units than the total allowed to operate were operating illegally resulting in a flow of 11 MLD, or
  - ii. Units are operating at higher than the consented capacity in spite of capacity restriction.



4. CETP was **non-complying** w.r.t. stipulated discharge standards of **BOD, COD, O&G and Total Chromium**.
5. The BOD & COD reduction through CETP was 32.8% & 38 % respectively.

**And Whereas,** CETP, Jajmau, Kanpur was inspected by a joint team of officials from CPCB and UPPCB on 27.03.2019 & 03.04.2019 and following observations were made:

1. CETP was operational on the day of inspection and the tannery effluent reaching to the CETP was in the range of 13-19 MLD clearly indicating that tanneries are operating illegally at capacities much higher than consented capacity
2. Analysis results of samples collected from CETP inlet & outlet to verify the status of compliance are as under:

Sl. no.	Parameters	CETP Inlet		CETP Outlet	
		Inlet of tannery effluent		Outlet	Standards
Sample Date: 27.03.19					
1	pH	9.0	8.3	6.0-9.0	
2	TSS	2559	199	100	
3	BOD	1823	<b>103</b>	30	
4	COD	3671	<b>368</b>	250	
Sample Date: 03.04.19					
1	pH	7.48	7.42	6.0-9.0	
2	BOD	1449	<b>394</b>	30	
3	COD	2501	<b>801</b>	250	

**Note:** All values of parameters are expressed in mg/l except pH

3. The characteristics of wastewater at inlet & outlet of CETPs were not consistent.
4. CETP was non-complying w.r.t BOD and COD. The parameters FDS, Total chromium and sulphide were not reported.

**And Whereas,** CETP, Jajmau, Kanpur was inspected by a Joint team of officials from CPCB and UPPCB on 09.04.2019. and the following observations were made:

1. CETP was operational on the day of inspection.
2. Analysis results of samples collected from CETP inlet & outlet to verify the status of compliance are as under:

Sl. no.	Parameters	CETP Inlet		CETP Outlet	
		Inlet of tannery effluent		Outlet	Standards
1	pH	8.39	8.07	6.0-9.0	
2	TSS	<b>1108</b>	<b>125</b>	100	
3	BOD	558	<b>342</b>	30	
4	COD	1113	<b>846</b>	250	
5	Total Cr	<b>18.1</b>	<b>3.99</b>	2.0	

3. CETP was operating at 39.18 MLD (25.32 ML domestic and 13.86 MLD tannery effluent) which indicates that;
  - i. Either more units than the total allowed to operate were operating illegally resulting in a flow of 13.86 MLD, or

- ii. Units were operating at much above the consented capacity in spite of capacity restriction.
- 4 The BOD & COD reduction through CETP was 38.7% & 23.9 % respectively.
- 5 CETP was **non-complying** w.r.t. stipulated discharge standards of **BOD, COD, TSS and Total Chromium**.

**And Whereas**, CETP, Jajmau, Kanpur was inspected by team of Joint team of officials from CPCB and UPPCB on 16.04.2019. and the following observations are made:

- 1 CETP was operational on the day of inspection.
- 2 Analysis results of samples collected from CETP inlet & outlet to verify the status of compliance are as under:

Sl no.	Parameters	CETP Inlet			CETP Outlet	
		Inlet of tannery effluent	Outlet	Standards		
1	pH	7.43	7.86			6.0-9.0
2	TSS	6685	463			100
3	BOD	846	486			30
4	COD	2187	928			250
5	Total Cr	212	19.3			2.0

- 3 CETP was **non-complying** w.r.t. stipulated discharge standards of **BOD, COD, TSS and Total Chromium**.
- 4 The BOD & COD reduction through CETP were 42.5% & 57.5 % respectively.

**And Whereas**, based on the above monitoring reports, the following observations are made:

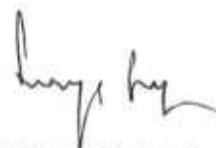
- 1. Effluent generation is measured as 11 MLD- 19 MLD at CETP inlet which is more than the designed capacity of 9 MLD tannery effluent. 1:3 ratio of tannery effluent to sewage effluent is not being maintained causing enhanced toxic load shock on biological reactor resulting in reduced performance. It results in poor treatability of effluent.
- 2. Even after restriction of production of member tanneries at 80% since June-July 2018 and the closure of tanneries except 28 tanneries since December 2018, the effluent generation is much higher than that allowed under Consent to operate issued by UPPCB.
- 3. High concentration of total Cr- in range of 2.38mg/l to 19.3mg/l, sulphides in range of 91.3mg/L to 165mg/l, TSS in the range of 74mg/L to 463 mg/l, in influent to CETP are observed, which cause hindrance to UASB operations resulting in poor performance. More than stipulated concentration of total Chromium and Sulphide in tannery effluent even after primary treatment and chrome recovery indicates improper functioning or non-performance of PETPs and Chrome recovery units of participating industries again resulting to toxic shock to microbial species of biological reactor resulting into reduced efficiency.
- 4. More than allowed quantity of effluent generation indicates that participating tanneries are not adhering to UPCB direction of operating on lower capacity.

**And Whereas**, non-compliance of standards by CETP amounts to collective non-compliance by CETP member industries, and therefore action has to be taken against CETP member industries; and

**And Now Therefore**, in view of the above, and in exercise of powers delegated to the Chairman, Central Pollution Control Board under Section 18 (1) (b) of Water (Prevention & Control of Pollution) Act, 1974, you are directed to comply with the following directions:

- All member tanneries connected to **CETP Jajmau, Kanpur** shall follow the PETP norms for discharge of Primary treated effluent into the CETP.
- CETP shall meet the desired effluent discharge standards at the outlet.
- If CETP does not meet the prescribed effluent discharge standards at outlet, allowed production capacity of member tanneries shall be reduced to ensure that CETP outlet meets the prescribed discharge standards.
- Member tanneries which do not meet PETP norms or follow directions regarding operations at reduced capacity shall be closed forthwith.

Necessary action as above, may therefore be taken and Action taken report may be sent to CPCB within 30 days of issue of these directions. Receipt of the directions may kindly be acknowledged.



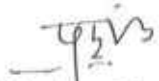
(S. P. Singh Parihar)  
CHAIRMAN

08/05/15



**Copy to:**

1. **Director General,**  
National Mission for Clean Ganga (MoWR, RD & GR)  
1st Floor, Major Dhyan Chand National Stadium  
India Gate, New Delhi – 110002  
: For kind information please.
2. **Managing Director**  
Uttar Pradesh Jal Nigam  
6, Rana Pratap Marg  
Lucknow - 226001 U.P.  
: For kind information and ensure proper  
O&M of CETP.
3. **Joint Secretary (CP-Division),**  
Ministry of Environment Forests & CC  
Indira Paryavaran Bhawan, Jor Bagh Road,  
New Delhi-110 003  
: For kind information please.
4. **Regional Director**  
Regional Directorate-North  
Central Pollution Control Board, PICUP Bhawan,  
Vibhuti Khand, Gomti Nagar, Lucknow (UP)  
: For kind information please
5. **Managing Director**  
Kanpur Electricity Supply Company Limited  
Kesa House, 14/71, Civil Line  
Kanpur (U.P.)  
: For kind information please.
6. **District Magistrate**  
Collectorate Office,  
KANPUR, Dist. Kanpur,  
Uttar Pradesh  
: For information and necessary action  
pls.
7.  **In-charge, IT Division, CPCB**  
: For uploading on CPCB website.

  
(Prashant Gargava)  
MEMBER SECRETARY