



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

Email/Speed Post

F. No.: B-190188/CETP-Banthar/PIAS/WQM-II/CPCB/2019-20

Dated: 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 BANTHAR, UNNAO- 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 (Design Capacity 4.5 MLD) at UPSIDC, Leather Technology Park, Banthar, Unnao needed upgradation as the CETP was not able to comply with all parameter of the stipulated norms; and

**Whereas,** despite lapse of considerable time, the state of non-compliance of standards by the CETP at UPSIDC, Leather Technology Park, Banthar, Unnao is continued unabated, no firm action has been taken for upgradation of CETP by either occupier of CETP or member units and it has become necessary to take action against the CETP member industries; and

**Whereas,** members of a CETP are jointly and individually responsible for adequate pre-treatment of their effluent, proper operation and maintenance of CETP and for ensuring compliance with effluent discharge 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,** Banthar Industrial Pollution Control Company vide letter dated 31.01.2015 replied to the directions issued to them that they shall upgrade CETPs on the same technology being proposed by CLRI, Chennai; and

**Whereas**, CPCB issued Show Cause Notice under section 5 of Environment (Protection) Act, 1986 dated 31/03/2016 to all **member units of CETP, UPSIDC Leather Technology Park, Banthar, Unnao (UP)**, Unnao why **should not be closed down** until all necessary pollution control measures are planned and implemented including setting up of individual full-fledged ETP comprising to primary, secondary, biological and tertiary treatment system to provide requisite treatment to effluent, so as to comply with the prescribed effluent discharge standards notified under Environment (Protection) Act, 1986 to the satisfaction of CPCB and also why appropriate environmental compensation not be imposed; and

**Whereas**, member units and CETP operator replied vide letter dated 30<sup>th</sup> May, 2016 and informed about the preparation of DPR and for improvement of CETO to ensure compliance of all parameters however no firm time schedule has been committed; and

**Whereas**, CPCB issued Directions **under** section 5 of Environment Protection Act, 1986 dated 14/07/2016 to all **member units of CETP, UPSIDC Leather Technology Park, Banthar, Unnao (UP)**, Unnao to participate in the improvement of CETP, to submit fixed time schedule and to submit additional proposal for improving the CETP to address compliance of FDS parameter;

**Whereas**, The Hon'ble Supreme Court in the writ petition (c) no. 375 of 2012 pronounced judgment 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,** CETP, Banthar, Unnao was inspected by official of CPCB on 09/05/2018 and following observations were made:

1. CETP was operational on the day of inspection.
2. Effluent reaching to CETP was in the range of 2.3-3.0 MLD.
3. Samples were collected from CETP inlet and outlet to verify the status of compliance.
4. The analysis report is as under:

Sl. No.	Parameters	CETP Inlet		CETP Outlet	
		Tannery effluent	Standards	Outlet	Standards
1	pH	8.01	-	8.25	6.0-9.0
2	TSS	<b>1028</b>	600	<b>132</b>	100
3	Sulphide	115	2	<b>35.2</b>	2
4	BOD	1746	-	<b>352</b>	30
5	COD	3381	-	<b>1105</b>	250
6	Total Chromium	<b>15.5</b>	2.0	1.09	2.0
7	TDS	13900	-	<b>15644</b>	-

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

- 5 CETP was found non-complying w.r.t. stipulated discharge standards of TSS, BOD, COD, and Sulphide.
- 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) showed total Chromium – 15.5 mg/l and TSS - 1028 mg/l (against Primary Effluent Treatment Plant (PETP) discharge norms of Total Chromium 2.0 mg/l and TSS 600 mg/l), indicating that PETP and Chrome segregation system installed by the member units are not adequate and functioning properly to achieve desired PETP treated effluent quality discharge standards/ CETP desired inlet quality.

**And Whereas,** UPPCB in June, 2018 directed tannery units connected with CETP Banthar, Unnao to operate at 50% of the consented capacity to make the generated effluent qualitatively & quantitatively compatible with existing CETP; and

**Whereas,** CPCB issued show cause notice dated 18/07/2018 to all operational member units of CETP for non-compliance of discharge norms; and



**Whereas**, 17 units replied to the show cause notice issued and informed that the Hon'ble NGT has granted two years of time to upgrade CETP Banthar, approval is granted to the submitted DPR for upgradation of CETP., facility of primary treatment is made in CETP Banthar for which member units are charged Rs. 10 per Kl as extra and adequacy assessment of PETP of member units has been done by IIT/CLRI/ NPC/NEERI; and

**Whereas**, a meeting was held on 25/09/2018 at CPCB, Delhi with officials of UPPCB, operator and member units of CETP, Banthar (Unnao) wherein it was agreed that there is a need to augment/upgrade PETPs, CRUs and to take necessary pollution control measures to ensure compliance of norms and finalized the action points for implementation by November 30, 2018; and

**Whereas**, CPCB issued Directions under section 5 of Environment (Protection) Act, 1986 dated 20<sup>th</sup> November, 2018 to all member units of CETP, UPSIDC Leather Technology Park, Banthar, Unnao (UP), to implement the pollution control measures by November, 30, 2018 and other directions issued; and

**Whereas**, CETP, Banthar, Unnao was inspected by joint team of officials from CPCB and UPPCB on 26/03/2019 and following observations are made:

1. CETP was under stabilization as the member units started operating after 15.03.2019.
2. The effluent was taken for charging of aeration tanks & recycling for stabilization.
3. Samples are collected from CETP inlet to find out the pollution load & to verify the status of CETP compliance. There was no discharge at CETP outlet.
4. The analysis report of samples collected from CETP is as under:

Sr. No.	Parameters	CETP Inlet		CETP Outlet	
		Tannery effluent	Standards	Outlet	Standards
1	pH	8.13	6.0-9.0	-	6.0-9.0
2	TSS	1219	600	-	100
3	Sulphide	217	-	-	2
4	BOD	1798	-	-	30
5	COD	2779	-	-	250
6	Total Cr	16.8	2	-	

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

5. Analysis of sample results show that CETP inlet was found non-complying w.r.t the total Chromium – 16.8 mg/l and TSS - 1219 mg/l (against discharge norms of total Chromium 2.0 mg/l and TSS 600 mg/l), indicating that PETP and Chrome Recovery Unit (CRU) installed by the member units are not functioning properly.
6. MLSS in the aeration tank-1& 2 were found to be 419 mg/l and 652 mg/l respectively.

**And Whereas,** CETP, Banthar, Unnao was inspected by joint team of officials from CPCB and UPPCB on 03/04/2019 and following observations are made:

1. CETP was under stabilization as the member units started operating after 15/03/19.
2. OCEMS provided at the CETP outlet for continuous online monitoring of flow, pH, TSS, Nitrate-N, color, Temperature, BOD, COD, Conductivity, Chloride and TDS.
3. Measuring device is not provided for measuring the flow of member unit.
4. The analysis report of CETP samples is as under:

Sr. No.	Parameters	CETP Inlet		CETP Outlet	
		Tannery effluent	Standards	Outlet	Standards
1	pH	7.5	6.0-9.0	7.63	6.0-9.0
2	TSS	<b>954</b>	600	<b>130</b>	100
3	BOD	2296	-	<b>688</b>	30
4	COD	2989	-	<b>1152</b>	250
5	Total Cr	1.42	2	0.36	2

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

5. CETP inlet was found non-complying w.r.t the TSS - 954 mg/l (against discharge norms of TSS 600 mg/l).
6. CETP outlet was found non-complying w.r.t the notified discharge standard of BOD, COD & TSS. The concentration of BOD was found 22.93 times higher than notified standard.

**And Whereas,** CETP, Banthar, Unnao was inspected by joint team of officials from CPCB and UPPCB on 09/04/2019 and following observations are made:

1. CETP was found operational & under stabilization.
2. Results of analysis of samples from inlet & outlet of CETP are tabulated below:

Sr. No.	Parameters	CETP Inlet		CETP Outlet	
		Tannery effluent	Standards	Outlet	Standards
1	pH	7.84	6.0-9.0	7.55	6.0-9.0
2	TSS	598	600	<b>122</b>	100
3	BOD	1117	-	<b>416</b>	30
4	COD	1860	-	<b>1164</b>	250
5	Total Cr	<b>14.9</b>	2	0.97	2

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

3. Analysis of sample results show that CETP inlet was found non-complying w.r.t the Total chromium – 14.9 mg/l (against discharge norms of total chromium 2 mg/l). Results indicate

that tannery units are not operating their PETP properly to achieve the chromium level of 2 mg/l.

4. The treated effluent is non-complying in terms of BOD (416 mg/l against 30 mg/l), COD (1164 against 250 mg/l) and TSS (122 mg/l against 100 mg/l).
5. MLSS and MLVSS in the aeration tank-1 were found to be 272 mg/l and 207 mg/l respectively. Similarly, MLSS and MLVSS in the aeration tank-2 were observed as 301 mg/l and 268 mg/l respectively

**And Whereas,** CETP, Banthar, Unnao was inspected by official of CPCB and UPPCB jointly on 16/04/2019 and following observations are made:

1. CETP was found operational.
2. Results of analysis of samples from inlet & outlet of CETP are tabulated below:

Sr. No.	Parameters	CETP Inlet		CETP Outlet	
		Tannery effluent	Standards	Outlet	Standards
1	pH	8.12	6.0-9.0	7.64	6.0-9.0
2	TSS	3138	600	155	100
3	BOD	2312	-	552	30
4	COD	4265	-	1565	250
5	Total Cr	98.10	2	1.22	2

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

3. CETP inlet was found non-complying w.r.t the Total chromium – 98.10 mg/l (against discharge norms of total chromium 2 mg/l) and TSS 3138 mg/l (against discharge norms of TSS 600 mg/l). Results indicate that tannery units are not operating their PETP properly to achieve the chromium & TSS level within discharge norms.
4. The treated effluent is non-complying in terms of BOD (552 mg/l against 30 mg/l), COD (1565 against 250 mg/l) and TSS (155 mg/l against 100 mg/l).
5. MLSS and MLVSS in the aeration tank-II were found to be 373 mg/l and 279 mg/l respectively.

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


1. It is evident that Primary Effluent Treatment Plant (PETP) and Chrome segregation system installed by the member units are not adequate and not functioning properly to achieve desired PETP treated effluent quality norms or tanneries are discharging untreated effluent in CETP, which has the potential to affect the treatment efficiency of CETP.
2. Persistent high concentration of Total Chromium in the CETP inlet is inhibiting the growth of MLSS.
3. Aeration tank I & II are not stabilize and MLSS concentration is decreasing continuously.
4. The treated effluent is regularly non-complying in terms of BOD, COD and TSS.
5. CETP is not adequate and not properly operated.

**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

**Now, Therefore**, in view of the above observations, and in exercise powers vested to the Chairman, Central Pollution Control Board under Section 18 (1) (b) of the of Water (Prevention & Control of Pollution) Act, 1974 , UPPCB is directed to issue directions to all member Tannery units and CETP operating agency to comply with the following:

1. All member tanneries connected to CETP, UPSIDC Leather Technology Park, Banthar, Unnao follow PETPs norms for discharge of effluent to CETP.
2. CETP shall meet the prescribed effluent discharge norms at outlet.
3. If CETP doesn't meet the prescribed effluent discharge norms at outlet; the production capacity of the member tanneries connected to CETP shall be reduced to ensure the compliance with discharge standards at CETP outlet.
4. Member tanneries units which do not meet PETPs norms or do not follow order of UPPCB regarding operation at reduced capacity, shall be closed forthwith

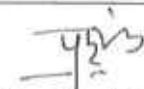
Receipt of these directions may be acknowledged and action taken report be sent to CPCB within 30 days from date of issue of directions.

  
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(S. P. Singh Parihar)  
CHAIRMAN



**Copy to:**

1.	<b>Director General,</b> 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.	<b>Joint Secretary (CP-Division),</b> Ministry of Environment Forests & CC Indira Paryavaran Bhawan, Jor Bagh Road, New Delhi-110 003	For kind information please.
3.	<b>Regional Director</b> Regional Directorate-North Central Pollution Control Board, PICUP Bhawan, Vibhuti Khand, Gomti Nagar, Lucknow (UP)	For follow up.
4.	<b>District Magistrate</b> Collectorate office Unnao, District Unnao, UP	For kind information please.
✓ 5.	<b>In-charge, IT Division, CPCB</b>	For uploading on CPCB website.

  
(Prashant Gargava)  
MEMBER SECRETARY