



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-Ernakulam/ 7281

Date: 11.12.2023

To

The Member Secretary
Kerala State Pollution Control Board
Plamoodu Junction, Pattam Palace P.O.
Thiruvananthapuram- 695004 (Kerala)

Subject: Directions under section 18(1)(b) of the Water (Prevention and Control of Pollution) Act, 1974, regarding non-compliance status of CETP-Ernakulam (250 KLD), Valanchirangara, Kerala.

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

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

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WHEREAS, CETP-Ernakulam (250 KLD design capacity), operated by **M/s Rubber Park India Pvt. Ltd.**, 2A, Kautileeyam Rubber Park, Valanchirangara, Ernakulam- 683556 (Kerala) (herein after referred as CETP) was inspected by CPCB officials on 16.06.2023 and following observations were made:

- i. The CETP is attached to the Rubber Park consisting of rubber and rubber wood based industries at Irapuram, Valayanchirangara, Ernakulum district.
- ii. The CETP is located separately at a nearby premise to the industrial estate M/s Rubber Park India Pvt. Ltd. and receives effluents in tankers. As informed, there are more than 50 industries, which send effluent to the CETP, however, effluent is being regularly transported from about 20 member units. Average quantity of effluent received is around 215 KLD.
- iii. The overall physical conditions of the CETP units indicate requirement of revamping and proper maintenance. It was observed that some of the CETP units, such as, bio-towers, equalization tank etc. are not fully functional. The blowers provided in the equalization tanks were found non-functional and bio-towers were found in physically damaged conditions and the distribution pipe network provided in the towers needs revamping for ensuring proper circulation of effluent & sufficient contact time.
- iv. It was informed that augmentation and revamping of the present CETP units are planned, once the installation and commissioning of the new CETP of same capacity in the same premises is completed.
- v. The OCEMS sensors, for monitoring pH, BOD, COD, TSS, & temperature are placed at outlet in a separate tank by drawing a small line of effluent from the treated effluent pumping line, after sand and carbon filters.
- vi. Connectivity to CPCB portal was found to be interrupted during the visit and the same was reconnected by resetting the system. Some intermittent data gaps are observed regularly from the OCEMS in the CPCB portal, which needs to be addressed. As informed, such temporary disconnections are happening during power failures.
- vii. As per the analysis report of the effluent sample, the CETP complies with the effluent discharge standards as prescribed by Kerala SPCB for the monitored parameters.
- viii. The inlet standards as well as the COD norms at outlet have not been prescribed by Kerala SPCB.
- ix. The OCEMS readings, during the sampling period, were observed for the quality parameters, namely, pH: 8.5 (as against lab result of 7.8), BOD: 25.6 mg/l (as against lab result of 21.6 mg/l), COD: 135.49 mg/l (as against lab result of 71.3 mg/l) and TSS: 57.72 mg/l (as against lab result of 15 mg/l). It can be observed from the OCEMS data and the analysis result of the corresponding sample collected during the visit that there is significant deviation in the OCEMS values vis-a-vis laboratory values.
- x. The CETP does not carry out regular calibration of the OCEMS sensors and as per the information provided by the Unit, the OCEMS was last calibrated on 27.09.2018, however, no records of calibration are maintained.
- xi. The CETP has a total land area of 96.15 acres and the treated effluent is disposed/stored within the CETP premises in a natural lagoon/low lying area having some natural vegetation growth. For the upcoming CETP, a lagoon is being constructed especially for this purpose at the premises. Manual flow meter is available for measuring the effluent disposed on land, however the same is not connected with OCEMS.
- xii. General upkeep, housekeeping, maintenance and operations of CETP are found not satisfactory and requires improvement.

AND, NOW, THEREFORE, in exercise of powers conferred under section 18(1)(b) of the Water (Prevention & Control of Pollution) Act, 1974, Kerala State Pollution Control Board (KSPCB) is hereby directed to take appropriate action for compliance of the following:

1. That the aforesaid CETP i.e. **M/s Rubber Park India Pvt Ltd. (CETP)**, Ernakulam:
 - a. augments/revamps the existing units, which are not functioning properly, and operates/maintains the treatment system, appropriately.
 - b. transmits the OCEMS data for the 'flow' parameter also to CPCB server.
 - c. undertakes regular calibration & maintenance of the OCEMS analysers as per standard operating procedures/ recommendations of the suppliers, so as to ensure of generating continuous & reliable data.
 - d. reuses the treated waste water for irrigation purposes as prescribed in CC&A. In this regard, the CETP shall prepare a comprehensive Irrigation Management Plan (IMP), in consultation with the agricultural scientist or agriculture university/institute, duly considering the land availability for irrigation against the treated wastewater generation and submit the same to KSPCB.
 - e. improves the housekeeping/ general upkeep of the treatment plant.
2. As per MoEF&CC Notification S.O. 4(E), dated 01.01.2016, the KSPCB shall prescribe Inlet Quality Standards for each CETP as per design of the CETP and local needs & conditions.
3. KSPCB shall also prescribe the outlet norms for COD, being the basic parameter, in CC&A.
4. KSPCB shall ensure that the CETP reuses the treated waste water for irrigation purposes as prescribed in CC&A, instead of discharging and storing in lagoons. In this regard, KSPSCB shall examine/verify the comprehensive Irrigation Management Plan (IMP) prepared by CETP as well as the land availability for irrigation against the treated wastewater generation and accordingly impose the conditions in CC&A ensuring no impact to the environment.

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


Bharat Kumar Sharma
Member Secretary

Copy to:

1.	The Chairman Kerala State Pollution Control Board Plamoodu Junction, Pattam Palace P.O. Thiruvananthapuram- 695004 (Kerala)	for information, please.
2.	The Additional Secretary (CP Division) Ministry of Environment, Forests & Climate Change, Prithvi Wing, 2 nd Floor, Indira Paryavaran Bhawan, Jor Bagh Road, New Delhi-110 003.	for information, please.
3.	The Regional Director, Nisarga Bhawan, A Block, 1st & 2nd Floors, Thimmaiah Road, 7th D-Main, Shivnagar, Bengaluru- 560079	for follow-up, please.
4.	Divisional Head, IPC-VI CPCB, Delhi	for information, please.
5.	Divisional Head, IT, CPCB, Delhi	for uploading on CPCB website, please.



Bharat Kumar Sharma

