



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

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CPCB/IPC-VII/CETP-Madhavaram/19884-9484

Date: 05.02.2024

To

The Member Secretary
Tamil Nadu State Pollution Control Board
76, Mount Salai, Guindy,
Chennai-600032 (Tamil Nadu)

Subject: Directions under section 18(1)(b) of the Water (Prevention and Control of Pollution) Act, 1974 regarding non-compliance status of CETP-Madhavaram Leather Manufacturers Facility Private Ltd., N-8. Talco Industrial Estate, Madhavaram, Chennai, Tamil Nadu.

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

‘परिवेश भवन’ पर्वी अर्जुन नगर, दिल्ली-110032

Parivesh Bhawan, East Arjun Nagar, Delhi-110032

दूरभाष/Tel : 43102030, 22305792, वेबसाईट/Website : www.cpcb.nic.in

WHEREAS, CETP-Madhavaram, operated by M/s Madhavaram Leather Manufacturers Facility Private Ltd., N-8. Talco Industrial Estate, Madhavaram, Chennai - 600060 (Tamil Nadu) (herein after referred as CETP) was inspected by CPCB officials on 14.06.2023 and following major observations were made:

- i. The CETP has been established in two phases. Phase-I, currently under maintenance, has a designed capacity of 400 KLD and CETP has obtained Consent to Operate (CTO), from TNPCB, valid up to March 31, 2024. The Phase-II (596 KLD) of CETP was, however, constructed without obtaining Consent to Establish (CTE) in 2018. Phase-II is now being operated at a reduced capacity of 400 KLD without valid Consent to Operate and Hazardous Waste Authorization from TNPCB.
- ii. The Hazardous Waste Authorization of Phase-I of CETP expired on 01.09.2020 and applied for renewal on 08.03.2021. It was informed that, the application is pending with TNPCB, because CETP has not complied with authorization conditions and submitted insufficient data to TNPCB.
- iii. The monitored values for the quality parameters at the outlet of CETP, namely, TSS: 116 mg/l (limit: 100 mg/l), TDS: 4362 mg/l (limit: 2100 mg/l), COD: 288 mg/l (limit: 250 mg/l), Sulphates: 1118 mg/l (limit: 1000 mg/l), Nitrate: 26.7 mg/l (limit: 10 mg/l) and Lead: 0.565 mg/l (limit: 0.1 mg/l), did not meet the prescribed treated effluent discharge standards.
- iv. The treated effluent is temporarily stored in two holding tanks, each having 201 m³ capacity. The treated effluent is then discharged through pipeline to a tank near the STP which is later mixed with secondary treated sewage for dilution and discharged into the Kodungaiyur canal as per the consent conditions.
- v. The filter press for dewatering sludge was found idle, whereas, sludge drying beds were filled with sludge. The CETP has been issued CTO with the condition that CETP dismantle all the sludge drying beds within six months from the date of issue of CTO, i.e., 23.03.2022.
- vi. The CETP is utilizing open land, owned by Tamil Nadu Industrial Development Association (TNIDA) adjacent to its premises, for operating sludge drying beds and storing this hazardous sludge, without concrete flooring, compound walls and caution signboard/name plates, in open space which may lead to soil and ground water contamination.
- vii. The CETP has membership with TSDF-Gummudipoondi, operated by M/s Tamil Nadu Waste Management Limited, for final disposal of their hazardous waste, however, around 195 tonnes of hazardous waste chemical sludge was kept in haphazard manner in designated storage shed without concrete flooring. The CETP has not disposed sludge since March 07, 2021.

- viii. Online Continuous Effluent Monitoring System (OCEMS) is installed at the outlet of CETP for measurement of pH, BOD, COD & TSS in the effluent. Electromagnetic Flowmeters are also installed at the inlet and outlet of the CETP. Both flowmeters and OCEMS are connected to the CPCB RTDMS portal.
- ix. The data of inlet values recorded manually and those recorded on the portal are listed below.

S. No	Month	Inlet value recorded manually (in KLD)	Inlet value recorded in RTDMS portal (in KLD)	Difference (in KLD)
1	April 2023	5883	2088	3795
2	May 2023	6465	2448	4017
3	June 2023	7213	2088	5125
Total		19561	6624	12937

There is a gap in the recordings of inlet and outlet flow readings, for each day out of 96 readings, only 45 readings were recorded on the portal. From the above table, it is clear that the readings are not recorded as per the actual quantity of effluent received from the member units which shows ambiguity in the treatment.

- x. The flow meters installed by the CETP are not equipped with totalizers to indicate the cumulative/total effluent flow and only show the instantaneous flow in m³/h, thereby making it difficult to calculate the total flow received and discharged by the CETP.
- xi. The OCEMS data was compared with the manual analysis results and the resulting variations are observed below. The variation in readings indicates that the OCEMS system needs validation/calibration.

Sl. No.	Parameters	Online flowmeter value (in mg/l except pH)	Sample value tested in Lab (in mg/l except pH)
1	BOD	49.1	26
2	COD	124.5	288
3	TSS	74.3	116
4	pH	7.93	8.22

AND NOW THEREFORE, in exercise of powers conferred under section 18(1)(b) of the Water (Prevention & Control of Pollution) Act, 1974, Tamil Nadu Pollution Control Board (TNPCB) is hereby directed to take appropriate action to ensure following compliances:

1. To take suitable action, as deemed fit, including levying of environmental compensation against the reported observations including operation of CETP without CTE, CTO and Authorization, exceedance of discharge standards, Hazardous waste storage, ambiguity in the inlet (effluent received) and outlet (effluent treated) quantities of the CETP etc. Further, to ensure compliance of the following by the CETP:
 - a) To obtain CTE, CTO and Hazardous Waste Authorization and comply with all the condition mentioned thereof for Phase II CETP.
 - b) To obtain Hazardous Waste Authorization and comply with all the condition mentioned thereof for Phase I CETP.
 - c) To operate or augment the treatment system, appropriately, for treatment of complete quantity of effluent received and discharging the treated effluent within the prescribed limits.
 - d) To install upgraded flow measurement devices with totalizers for the inlet to and outlet of the CETP and keeping records of the same.
 - e) To augment/operate the sludge drying system for efficient sludge handling/sludge drying and dismantle the sludge drying beds as per the TNPCB Consent conditions.
 - f) To make adequate arrangement to keep the hazardous waste/sludge in a designated & properly constructed storage area/shed.
 - g) To dispose stored quantity of the hazardous waste/sludge to TSDF site and to maintain disposal of Hazardous waste generated on regular basis.
 - h) To undertake 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.

The action taken by TNPCB shall 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.
Tamil Nadu State Pollution Control Board
76, Mount Salai, Guindy,
Chennai-600032 (Tamil Nadu)
2. **The Additional Secretary (CP Division)** : for information, please.
Ministry of Environment, Forests &
Climate Change,
Prithvi Wing, 2nd Floor, Indira Paryavaran
Bhawan, Jor Bagh Road,
New Delhi-110 003.
3. **The Regional Director,** : for follow-up, please.
Central Pollution Control Board,
2nd Floor, 77-A South Avenue Road,
Ambattur Industrial Estate,
Ambattur Taluk, Thiruvallur
Chennai-600058 (Tamil Nadu)
4. **Divisional Head, WQM-I,** : for information, please.
CPCB, Delhi
- ✓ 5. **Divisional Head, IT** : for uploading on CPCB
CPCB, Delhi website, please.



Member Secretary

