



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

CP-14/15/2023-IPC-III-HO-CPCB-HO 6437

November 24, 2023

To,

The Member Secretary,
Gujarat Pollution Control Board,
Paryavaran Bhavan,
Sector-10A, Gandhi Nagar
Gujarat – 382 010

Directions under section 18(1) (b) of the Water (Prevention & Control of Pollution) Act, 1974 & the Air (Prevention & Control of Pollution) Act, 1981 in the matter of M/s Shree Madhi Vibhag Khand Udyog Sahkari Mandli Ltd. Post Box No.: 05, At & Post: Madhi, Tal: Bardoli, Dist-Surat, Gujarat -reg.

WHEREAS, under section 16 of the Water (Prevention & Control of Pollution) Act, 1974 and under Section 16 of the Air (Prevention & Control of Pollution) Act, 1981, one of the functions of the Central Pollution Control Board (CPCB), constituted under 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, the Central Government has notified the standards for discharge of environmental pollution from various categories of industries under the 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 Rules 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, a team of officials from CPCB inspected M/s Shree Madhi Vibhag Khand Udyog Sahkari Mandli Ltd. Post Box No.: 05, At & Post: Madhi, Tal: Bardoli, Dist-Surat, Gujarat (hereinafter referred as 'the Unit') on 12.06.2023 under 'Environmental surveillance of 17 categories of highly potential industries and common facilities' based on real-time OCEMS (online continuous effluent monitoring system) data programme. The major observations made by the inspecting team are as follows:

1. The Unit has common CC&A for Sugar and Distillery plant with validity up to 04.03.2023.
2. At the time of visit, the Unit was not operational and has submitted that the cane crushing season was stopped on 30-03-2023 and the distillery operations are stopped on 14-04-2023. Hence, the ETP of sugar unit, MEE and SBT of distillery unit were also non-operational.

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3. A bypass line (Fixed) was found from the effluent collection tank to disposal point of treated wastewater. On inquiring the representative of the Unit mentioned that they have provided this bypass line because the storm water from the Unit also gets collected in the effluent collection tank and during monsoon the collection tank overflows and to avoid this they have provided the bypass line to discharge the storm water to the agricultural fields.
4. The Unit has provided ETP for the treatment of wastewater at the Sugar plant. The Unit has provided MEE for treating the spent-wash generated from distillery followed by SBT facility to treat the MEE Condensate along with spent-tees and the concentrated spent-wash is spayed on press mud to produce bio-compost at compost yard.
5. As per the CC&A, the final treated effluent confirming the prescribed standards shall be utilized for irrigation, plantation/gardening within industrial premises only and in no case wastewater shall be discharged outside the premises. However, during the visit it was informed that the Unit is using the treated effluent for irrigation within the premises and also giving the treated effluent to the farmers for irrigation, outside the premises. Unit is not keeping any records of treated water quantity used within the premises and given outside for irrigation.
6. It was also found that concentrated spent-wash is stored at earthen lagoon without any lining and also was disposed at many places of bio-compost yard.
7. The Unit has installed OCEMS and flow-meter at the Sugar industry outlet is being displayed under distillery name. Flow-meter is not provided at the final wastewater discharge point ETP (SBT unit) provided at Distillery unit.
8. Bio-compost yard is not covered and unit is not carrying out the bio-composting as per the CPCB's SoP for Bio-composting operation for molasses based distilleries. Unit has not provided windrow makers, leachate collection drains & pits, floor lining and logbook is also not maintained.
9. At the time of visit, 1 flow-meters was found installed at sugar unit and 3 flow-meters at distillery (out of 3, one was not found at the time of visit and reportedly it was sent for calibration), whereas data of one flow-meter is integrated with CPCB server.
10. The data of flow meter which is being transmitted to CPCB portal could not be traced as the make and model of the flow-meter mentioned in CPCB's registration portal is not matching with any of the flow-meter installed. There is no provision provided in the portal for Pan, tilt & zoom option by M/s Glens and it has only one focused view of the spent-wash receiving tank and only some part of lagoon at the bio-compost yard is visible.
11. The distillery Unit was not maintaining the logbook on the treated wastewater generated, recycled water back in the process, quantity of treated wastewater utilized for plantation/gardening inside the unit and supplied to farmers outside the premises for agricultural purpose.

WHEREAS, it was evident from the above observations made by the inspection team, that the Unit [M/s Shree Madhi Vibhag Khand Udyog Sahkari Mandli Ltd.] (Distillery unit) is violating the protocol of CPCB (storage of effluent /spent-wash in earthen pond, installation of by-pass line, Camera without PTZ facility etc.). The Unit also operating beyond the expiry of the Consent (i.e. from 05.03.2023 to 14.04.2023). The concentrated spent-wash is stored at earthen lagoons without any lining which may result in groundwater contamination. The Unit has also not provided piezometers in the compost yard to monitor groundwater quality and leachate collection system also not provided in the bio-compost yard; and

NOW, therefore, in exercise of the powers conferred under Section 18(1) (b) of the Water (Prevention and Control of Pollution) Act, 1974; the Gujarat Pollution Control Board (GPCB) is hereby directed to take appropriate action against the Unit [M/s Shree Madhi Vibhag Khand Udyog Sahkari Mandli Ltd., Madhi, Tal: Bardoli, Dist-Surat, Gujarat] and ensure compliance of the following in a time bound manner:

1. The Unit shall ensure that the spent-wash is stored in an impervious and lined lagoon of 30 days storage capacity, constructed for bio-composting purpose and no spillage should occur out of the lined lagoon. The lagoon shall be duly lined with 250 micron HDPE sheet and pitched by stone/brick with cement mortar to prevent leachate.
2. The Unit shall submit a time bound action plan for dismantling of unlined/earthen lagoon (s) in a scientific manner to CPCB and GPCB. The sludge and effluent shall be disposed of scientifically and complete sludge & effluent disposal report along with documentary evidence shall be submitted to CPCB and GPCB.
3. The Unit shall not operate its plant beyond the expiry of the consent order.
4. The Unit shall remove the bypass line provided from the effluent collection tank to disposal point of treated wastewater and shall provide separate permanent storm water collection/management facility.
5. The Unit shall upgrade the existing Camera installed at bio-compost yard to night vision PTZ Camera and also integrate all flow-meters installed at distillery plant with CPCB server.
6. The Unit shall install at least three number (one at upstream and two at downstream of groundwater flow direction) of piezometers around spent-wash storage lagoon.
7. The Unit shall provide leachate collection system in the bio-compost yard and also provide concrete floor all around the bio-compost yard with provision of garland drain and collection sump.
8. The Unit shall regularly maintain the environmental data on the display board installed at the main gate of the Unit.
9. The Unit shall maintain the logbook for the treated wastewater generated, recycled water used in the process, quantity of treated wastewater utilized for plantation/gardening etc.
10. The Unit shall provide flow-meter at the final wastewater discharge point ETP (SBT unit).

The action taken report shall be sent by GPCB to the CPCB within 30 days from the date of receipt of these directions. GPCB shall also acknowledge the receipt of these directions to CPCB within 15 days from the date of the receipt.



(BHARAT KUMAR SHARMA)
MEMBER SECRETARY

Copy to:

1. **The Chairman,**
Gujarat Pollution Control Board,
Paryavaran Bhavan,
Sector-10A, Gandhi Nagar-382 010,
Gujarat

: For information please.



2. **The Director, (CP Division),** : For information please.
Ministry of Environment, Forests & CC, Prithvi
Block, Indira Paryavaran Bhawan, Jorbagh
Road, New Delhi – 110 003
3. **The Regional Director,** : For information & follow up please.
Regional Directorate- Vadodara Parivesh
Bhawan, Opp. Ward No. 10 VMC Office
Subhanpura, Vadodara– 390 023
- ✓ 4. **The Div. Head, IT Division, CPCB Delhi** : For uploading in CPCB website please.
5. **The Div. Head, IPC-III Division, CPCB Delhi** : For record and necessary action please.



(BHARAT KUMAR SHARMA)
MEMBER SECRETARY

