



Speed Post

CPCB/IPC-VII/CETP-ROHA/ 10898

Dated: 18.03.2024

To

The Member Secretary
Maharashtra Pollution Control Board
Kalpataru Point, 2nd – 4th Floor
Opp. Cine Planet Cinema, Nr. Sion Circle
Sion (E), Mumbai-400 022 (Maharashtra)

Subject: Directions under section 18(1)(b) of the Water (Prevention and Control of Pollution) Act, 1974 regarding non-compliance status of Common Effluent Treatment Plant (CETP), M/s. RIA CETP Co. Op. Society Ltd. Plot No. 6, 9 & 11, MIDC Dhatav, Roha, Raigad, Maharashtra

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

WHEREAS, CETP-M/s. RIA CETP Co. Op. Society Ltd. Plot No. 6, 9 & 11, MIDC Dhatav, Roha, Raigad, Maharashtra (herein after referred as CETP) was inspected by CPCB officials on 17.11.2023 and following major observations were made:

‘परिवेश भवन’ पूर्वी अर्जुन नगर, दिल्ली-110032

Parivesh Bhawan, East Arjun Nagar, New Delhi - 110032

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

- I. The Consent to Operate (CTO) dated 30.07.2022 is valid upto 31.12.2026 for the operation of 22.5 MLD CETP.
- II. It was revealed that pursuant to the directions of MPCB dated 06.03.2017 under Section-33 A of The Water (Prevention and Control of Pollution) Act, 1974 in view of continuous non-compliance of outlet norms, the RIA CETP under the possession of M/s RIA CETP Co-Op. Society Ltd. was handed over to MIDC and subsequently MIDC handed over to M/s R&B Infra Projects Pvt. Ltd. & Hydroair Tectonics (PCD) Ltd. (JV) for up-gradation and O&M on 01.02.2020. It is observed that rehabilitation and up-gradation of CETP is completed and O & M is under process.
- III. It was mentioned that the RIA CETP (10 MLD capacity) was commissioned in the year 2005 as Phase-1. Further, as Phase-2, Additional capacity i.e. 12.5 MLD with ASP and Tertiary Treatment (Filtration- Pressure Sand Filters (PSF) + Activated Carbon Filters (ACF)) was commissioned in the year 2017. So, the CETP has the total capacity of 22.5 MLD. There was further additional work of up-gradation and rehabilitation of the CETP (2020-2023) due to direction (in 2017) of MPCB in view of continuous non-compliance of CETP.
- IV. It was reported that 56 industrial units have obtained membership from CETP. Out of 56 industrial units, the CETP receives the effluent from 43 units and the remaining 13 member industries have shifted to Zero Liquid Discharge condition.
- V. It was stated that the CETP receives two streams of effluent viz., treated effluent @7 MLD from M/s Sudarshan Chemicals Ltd. located in MIDC (not a member industry) and termed as Low COD stream, and treated/partially treated effluent @ 7MLD from member industries and termed as High COD Stream.
- VI. As per consent issued to M/s Sudarshan Chemicals Industries Ltd., the treated effluent is to be recycled to the maximum extent possible and discharge the remaining at the CETP outlet sump through dedicated pipeline. However, it was found that the treated effluent from M/s Sudarshan Chemicals Industries Ltd. is mixed with effluent from member industries in the Anoxic tank of CETP.
- VII. M/s. Sudarshan Chemicals Industries Ltd. has also installed OCEMS in the CETP premises for monitoring their treated effluent discharged, into the CETP.
- VIII. The average inlet and outlet flow at the CETP for Sep-Nov, 2023 is within the consented flow of CETP of 22.5 MLD.
- IX. During the visit on 17.11.2023, the CETP was found operational and has installed OCEMS (2 Nos.) for inlet and outlet of CETP. The parameters monitored through OCEMS are pH, TSS, BOD, COD, Ammonical Nitrogen, Phenolic Compounds, Chromium, Pesticides, Oil & Grease and Conductivity. In this context, the CETP has also submitted details and calibration certificate of the OCEMS.
- X. It was found that the OCEMS values noted at site w.r.t. TSS, BOD, Ammonical Nitrogen (as N), Phenolic Compounds (as C₆H₅OH), and Oil & Grease are within the discharge standards, while pH & COD values exceeded the standards.

- XI. It was also reported that the OCEMS details viz., device ID, device make, device model, certification, etc. was not updated/corrected on CPCB OCEMS registration portal.
- XII. The analysis results of sample collected from inlet of the CETP revealed that the concentration of pH: 4.4 (Inlet Norms: 5.5-9.0), TDS: 21,744 mg/l (Inlet Norms: 4000 mg/l), COD: 4920 mg/l (Inlet Norms: 3000 mg/l) and BOD: 1850 mg/l (Inlet Norms: 1000 mg/l) exceeds the inlet (design criteria) norms of the CETP mentioned in the CCA.
- XIII. Gross non-compliance was observed based on the analysis results of sampling carried out at outlet of CETP, with respect to the monitored parameters viz., TSS: 566 mg/l (Discharge Norms: 100 mg/l), BOD: 1,125 mg/l (Discharge Norms: 100 mg/l), COD: 2,640 mg/l (Discharge Norms: 250 mg/l), Nitrate-Nitrogen : 90 mg/l (Discharge Norms: 50 mg/l), Iron: 20.8 mg/l (Discharge Norms: 3.0 mg/l), Manganese: 21.15 mg/l (Discharge Norms: 2.0 mg/l) , Lead: 0.32mg/l (Discharge Norms: 0.1 mg/l), Hexavalent Chromium: 0.24 mg/l (Discharge Norms: 0.05 mg/l), Cadmium: 0.15 mg/l (Discharge Norms: 0.05 mg/l). All monitored parameters exceeds the discharge standards.
- XIV. It is revealed that there is hardly any treatment of wastewater in the CETP and the present achieved reduction at outlet of the CETP is mainly due to dilution by mixing of treated effluent of almost equal quantity from M/s. Sudarshan Chemicals Ltd.
- XV. During the visit on 17.11.2023, it was reported that there is no on-site storage facility for the hazardous waste in the CETP. It was also stated that the dewatered sludge from the filter press is directly collected into trucks using conveyer belts and is disposed to CHWTSDF- M/s. Mumbai Waste Management Limited (MWML), MIDC Taloja, Panvel, Raigad. During visit, HW sludge was found accumulated onto the conveyer belt.
- XVI. It was stated that the CETP had poor housekeeping/maintenance in the flash mixer area. Furthermore, the colored froth overflow and accumulation of wastewater from tanks are observed near the flash mixer area.
- XVII. It was reported that the display board at the entrance gate (as per Hon'ble Supreme Court order in WP 657/1995) is not provided at the entrance gate.

WHEREAS, as per order dated 06.07.2022 of Hon'ble NGT in OANo. 58 of 2022 (WZ) filed by Aryavart Foundation, regarding non-compliances and violation of environmental norms by M/s Roha Industrial Association Common Effluent Treatment Plant (RIA CETP) Co. Op. Society Ltd., Hon'ble NGT constituted three-member committee comprising members from the MoEF & CC, Integrated Regional Office (IRO), Nagpur; Central Pollution Control Board (CPCB), Regional Directorate, Pune and MPCB, where MPCB is Nodal Agency. The committee has submitted two reports to Hon'ble NGT through MPCB. The matter is under consideration before the Hon'ble NGT.

WHEREAS, in view of the continuous non-compliances and not achieving the consented discharge standards, MPCB has taken various actions against M/s. RIA CETP Co. Op. Society Ltd., Dist. Raigad by issuance of Show Cause Notices, Prosecution Notices, Directions as well as filing of Criminal Complaint against the CETP and forfeited the Bank Guarantee of Rs.10 Lakhs.


WHEREAS, As per Order of Hon'ble Supreme Court in the matter of Writ Petition WP(C) No. 657 of 1995; Research Foundation of Science Technology and Natural Resource Policy vs Union of India & Ors, "SPCBs/PCCs should ensure that all industries involved in hazardous chemicals and generating hazardous wastes should display online data outside the main factory gate, on quantity and nature of hazardous chemicals being used in the plant, water and air emissions and solid waste generated within the factory premises. If such data is not made available, the unit should be asked to show cause or even be asked to close down"; and

AND, NOW, THEREFORE, in exercise of powers conferred under section 18(1) (b) of the Water (Prevention & Control of Pollution) Act, 1974, Maharashtra Pollution Control Board (MPCB) is hereby directed to take stringent action including levying of environmental compensation against continual gross violation and non-compliance of CETP in terms of discharge norms, including no provision of display board on main entrance gate and to ensure following compliance by the CETP:

- a. To take stringent action including levying of environmental compensation against continual gross violation by the CETP and also individual non-compliant member industries.
- b. To operate or augment the treatment system, appropriately, so as to meet the prescribed discharge standards.
- c. To undertake regular calibration, maintenance and validation of the OCEMS analyzers as per standard operating procedures/recommendations of the suppliers, so as to ensure generation of continuous & reliable data.
- d. To update correct OCEMS details viz., device ID, device make, device model, certification, etc. on CPCB OCEMS registration portal.
- e. To make adequate arrangement to keep the hazardous waste /sludge in a designated & properly constructed storage area /shed.
- f. To amend consents w.r.t. disposal point of treated effluent of M/s. Sudarshan Chemicals Industries Ltd. in the CETP, its treatment/dilution and combined discharge.
- g. To provide display board on main entrance gate, in accordance with Hon'ble Supreme Court order in WP No. 657 of 1995, showing information on water & air emissions and waste generated within the CETP premises.

It is also directed to develop monitoring mechanism all member industries of CETP and to take stringent action against the member industries for discharging wastewater exceeding inlet design norms/criteria of CETP by MPCB.

The action taken by MPCB 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.
Maharashtra Pollution Control Board
Kalpataru Point, 2nd – 4th Floor
Opp. Cine Planet Cinema, Nr. Sion Circle
Sion (E), Mumbai – 400 022 (Maharashtra)
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
Survey No. 110, Dhankude Multi Purpose
Hall Baner Road, Baner, Pune - 411045
4. **Divisional Head, WQM-I,** : for information, please.
CPCB, Delhi
5. **Divisional Head, IT** : for uploading on CPCB
CPCB, Delhi website, please.


(Bharat Kumar Sharma)

