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To

Member Secretary,
Delhi Pollution Control Committee,
Building, 4th & 5th Floor ISBT,
GT Karnal Rd, Kashmere Gate, New Delhi,
Delhi 110006

DIRECTIONS UNDER SECTION 18 (1) (b) OF THE WATER (PREVENTION AND CONTROL OF POLLUTION) ACT, 1974 REGARDING ANNUAL INSPECTION OF GROSSLY POLLUTING INDUSTRIES (GPIs) 2023-24 UNDER NAMAMI GANGE PROGRAMME

WHEREAS, the Central Board, has delegated powers vested under Section 18 (1) (b) of the Water (Prevention & Control of Pollution) Act 1974 to the Member Secretary, Central Pollution Control Board vide its resolution made in 196th Board meeting dated 29th March, 2022 to issue direction under Section 18 (1) (b) of the Water (Prevention & Control of Pollution) Act, 1974 to State Boards; 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 Water (Prevention and Control of Pollution) Act, 1974 is to coordinate activities of the State Pollution Control Boards and Pollution Control Committees (PCCs) and to provide technical assistance and guidance to SPCBs / PCCs; and

WHEREAS, the Central Government has notified standards for discharge of environmental pollutants from industries and Common Effluent Treatment Plants (CETPs), under the Environmental (Protection) Act, 1986 and rules framed there under; and

WHEREAS, the SPCBs and PCCs are empowered to stipulate standards for discharge of environmental pollutants for various categories of industries and CETPs more stringent than those notified by the Central Government, under the Environmental (Protection) Act, 1986 and rules framed there under; and

WHEREAS, Grossly Polluting Industries (GPIs) are defined as industrial units having potential to discharge 100 kg/day BOD load and/or handling hazardous chemicals as specified in Manufacturing, Import and Storage of Hazardous Chemicals Rules 1989 and as amended; and

WHEREAS, Chemical (Pharmaceuticals, Organic, Inorganic, Fertilizers, Refinery and Pesticides), Distillery, Sugar, Pulp & Paper, Textile, Dying, Bleaching, Slaughter House, Tannery, Food & Dairy and Others categories of industry located in states of Uttarakhand, Uttar Pradesh, Jharkhand, Bihar, Delhi, Haryana and West Bengal have been identified as GPIs having potential to discharge effluent directly or indirectly into the rivers Ganga & Yamuna through drains or tributaries, which cause adverse effect on the water quality of these rivers and their tributaries; and

WHEREAS, it has been decided that inspection of Grossly Polluting Industries (GPIs) operating in river Ganga & Yamuna main stem states should be made an annual exercise under Namami Gange Programme and joint teams of experts/officials from third party technical institutes like IITs, NITs etc, SPCBs, State Mission Clean Ganga (SMCG)/ District Ganga Committee (DGC) shall carry out inspections of GPIs; and

WHEREAS, a meeting was held on December 16, 2023 with officials of CPCB, National Mission for Clean Ganga (NMCG), SPCBs and technical institutions to discuss modalities of annual inspection of GPIs (2023-24) wherein following decisions were taken:

i. Technical institutions shall be engaged for carrying out the inspection of the GPIs located in the main stem states of rivers Ganga & Yamuna and their tributaries to verify the compliance w.r.t. notified norms and consent conditions, ETP adequacy assessment, water audit etc.

ii. Concerned SPCBs and SMCGs/DGCs shall nominate a nodal officer who will coordinate with technical institutions for participation in joint inspection. SPCBs shall attach atleast one officer with each technical institute to facilitate the surprise inspection.

iii. Concerned SPCBs shall nominate officer of rank of Scientist B or above to participate in inspections.

iv. Closure directions shall be issued by SPCBs to all temporary closed units except GPIs which are seasonally closed or have provided prior intimation of closure to concerned SPCB/CPCB. After consideration of re-opening request, unit shall be re-inspected by joint team consisting of technical institutes and SPCBs.

v. If technical institutes are not allowed to enter in industries, SPCBs shall issue closure direction and random inspection of such units shall be carried out by SPCB officials.

vi. In case of by-pass reported by technical institutes, SPCBs shall issue suitable directions including issuance of closure direction and levying environmental compensation.

vii. SPCBs shall take appropriate action within 15 days of receipt of inspection report and upload the same on CPCB Portal.

viii. In case of non-compliance, SPCBs shall issue directions (either show-cause notice for closure or closure directions) within 15 days of receipt of inspection reports. Further in case of Show Cause Notices, the unit shall be re-inspected and closure directions shall be issued in case of non-compliance within 30 days. Follow up inspections of show-cause notices shall be carried out by SPCB officials.

ix. SPCBs shall follow the guidelines prepared by CPCB for initiating action, based on the inspection reports of the technical institutes, as well as for revocation of closure directions.

x. Concerned SPCBs shall provide the complete list of GPIs in their state. If any unit found non-complying and not in the list of GPIs provided by SPCBs, the concerned SPCBs shall be levied environmental compensation.

AND WHEREAS, Central Pollution Control Board vide letter dated March 26, 2024, March 28, 2024 and April 22, 2024 issued sanction order to authorize the following technical institutions for carrying out inspection of GPIs during March – June 2024:

1	Indian Institute of Technology, Delhi (IIT-D)
2	Indian Institute of Technology, Roorkee (IIT-R), Uttarakhand
3	Indian Institute of Technology, BHU (IIT-BHU), Varanasi, Uttar Pradesh
4	Indian Institute of Technology, Kanpur (IIT-K), Uttar Pradesh
5	Indian Institute of Technology (Indian School of Mines) (IIT-ISM), Dhanbad
6	Institute of Chemical Technology (ICT), Mumbai
7	Indian Institute of Engineering Science and Technology (IIEST), Shibpur, West Bengal
8	National Institute of Technology, Patna (NIT-P), Bihar
9	Motilal Nehru National Institute of Technology, Allahabad (MNNIT), Uttar Pradesh
10	National Institute of Technology, Delhi (NIT-D)
11	Central Pulp & Paper Research Institute (CPPRI), Saharanpur, Uttar Pradesh
12	Jadavpur University, Kolkata, West Bengal
13	Aligarh Muslim University, Aligarh (AMU), Uttar Pradesh
14	Harcourt Butler Technical University (HBTU), Kanpur, Uttar Pradesh
15	National Sugar Institute (NSI), Kanpur, Uttar Pradesh
16	CSIR-National Environmental Engineering Research Institute, Delhi (CSIR-NEERI)
17	CSIR-Indian Institute of Toxicology Research (CSIR-IITR) , Lucknow, Uttar Pradesh
18	Vasantdada Sugar Institute (VSI), Pune
19	CSIR-Central Leather Research Institute (CSIR-CLRI)
20	Delhi Technological University (DTU), Delhi
21	Jamia Milia Islamia (JMI), Delhi
22	Pollution Control Research Institute, Bhel (PCRI-BHEL), Haridwar, Uttarakhand
23	Central University of South Bihar (CUSB), Gaya, Bihar
24	Muzaffarpur Institute of Technology (MIT), Muzaffarpur, Bihar
25	G. B. Pant University of Agriculture and Technology (GBPUAT), Pantnagar, Uttarakhand
26	Guru Jambheshwar University of Science and Technology (GJU), Hisar, Haryana

AND WHEREAS, out of 189 GPIs in Delhi-NCT, 14 have been inspected; and

NOW, THEREFORE, in view of above observations and in exercise of the power conferred under section 18(1) (b) of the Water (Prevention and Control of Pollution) Act, 1974, you are hereby directed to take appropriate measures for compliance of the following:

1. DPCC shall nominate a nodal officer who will coordinate with technical institutions for participation in joint inspection. SPCBs shall attach atleast one officer of rank of Scientist B or above with each technical institute to facilitate the surprise inspection.
2. DPCC shall follow the guidelines prepared by CPCB for issuance & revocation of directions based on industrial inspections (*Annexure-I*).
3. DPCC shall take appropriate action within 15 days of receipt of inspection report. Action to be uploaded on CPCB GPI portal (https://cpcbinspection.co.in/gpi/).
4. In case of bypass and industries denying the entry of inspection team, DPCC shall issue closure directions along with electricity disconnection immediately and random inspection of such GPIs shall be carried out by DPCC officials.
5. Such GPIs shall also be directed to submit the action plan to curb the pollution and adequacy assessment report of their effluent treatment plant (ETP) and same may be forwarded to CPCB within 30 days.
6. In case of non-compliance, DPCC shall issue directions (either show-cause notice for closure or closure) within 15 days of receipt of inspection reports.
7. In case of Show Cause Notices, the unit shall be re-inspected and closure directions shall be issued in case of non-compliance within 30 days. Follow up inspections of show-cause notices shall be carried out by DPCC officials.
8. Closure directions shall be issued by DPCC to all temporary closed units except GPIs which are seasonally closed or have provided prior intimation of closure to concerned SPCB/CPCB. After consideration of re-opening request, unit shall be re-inspected by joint team consisting of technical institutes and DPCC.
9. Concerned DPCC officials participating in the joint inspection shall sign inspection reports at the inspection site.
10. In case samples are being analysed by DPCC labs, sample results shall be provided to the institutions within 15 days of samples being made available to labs.
11. DPCC shall submit a tabulated weekly report on status of inspection reports processed and action taken on weekly basis for preceding week on every Monday.

The action taken by SPCB shall be intimated to CPCB within 15 days of receipt of this direction.

(Bharat Kumar Sharma)
MEMBER SECRETARY

Copy to:

1. Director General,
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. Additional Secretary (CP Division),
Ministry of Environment, Forests, & Climate Change,
Indira Paryavaran Bhawan, Jorbagh Road,
New Delhi – 110013
: for kind information please

3. Regional Director,
Regional Directorate (Chandigarh),
Central Pollution Control Board,
BSNL Telephone Exchange, 2nd Floor,
Sector 49-C, Chandigarh-160 047
: for kind information and to ensure compliance of the direction please

4. Divisional Head, IT Division, CPCB
: for uploading on CPCB website

5. Master File, CPCB
: for record

(Bharat Kumar Sharma)
MEMBER SECRETARY

STANDARD PROTOCOL FOR CONDUCTING INSPECTIONS, REPORT PREPARATION & ACTION

March, 2023

CPCB

CENTRAL POLLUTION CONTROL BOARD
Ministry of Environment, Forest & Climate Change
Govt. of India

LIST OF ABBREVIATIONS

AAQ	Ambient Air Quality
ATFD	Agitated Thin Film Dryer
CCA	Consolidated Consent and Authorization
CETP	Common Effluent Treatment Plant
CGWA	Central Ground Water Authority
CHWIF	Common Hazardous Waste Incineration Facility
CHWTSDF	Common Hazardous Waste Treatment, Storage & Disposal Facility
CBWTF	Common Bio-medical Waste Treatment Facility
CPCB	Central Pollution Control Board
CPCB HO	Central Pollution Control Board-Head Office (Delhi)
DH	Divisional Head
ETP	Effluent Treatment Plant
GW	Ground Water
HW	Hazardous Waste
MEE	Multiple Effect Evaporator
NAAQM	National Ambient Air Quality Monitoring
NGT	National Green Tribunal
O&M	Operational & Maintenance
OCEMS	Online Continuous Effluent/Emission Monitoring System
PCC	Pollution Control Committee
RD	Regional Directorate
SPCB	State Pollution Control Board
ZLD	Zero Liquid Discharge

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1. INTRODUCTION

The Central Pollution Control Board (CPCB) conducts inspections of industries and environmental infrastructure facilities like Common Effluent Treatment Plant (CETP), Common Hazardous Waste Treatment Storage & Disposal Facility (CHWTSDF), Common Bio-Medical Waste Management Facility (CBWTF) etc. for verification of compliance to environmental standards, verification of Online Continuous Effluent/Emission Monitoring System (OCEMS) installed, legal inspections, investigation of complaints, re-inspection to verify compliance to directions issued etc.

The inspections carried out by CPCB can be classified into different categories based on the purpose of visit for objective specific and quick evaluation of report.

Time and again need was felt for a uniform systematic protocol for conducting inspections, report preparation, evaluating compliance verification & degree of violation (if any) and action required to be taken. This protocol is applicable to all kinds of inspections conducted in CPCB and is expected to bring consistency in procedure, information collected, observations and reporting. It has a step-wise flow for systematic inspection of an industrial facility for compliance verification as per the Water (Prevention and Control of Pollution) Act 1974, The Air (Prevention and Control of Pollution) Act 1981, The Environment (Protection) Act 1986 and various rules notified under the Environment (Protection) Act, 1986, as the case may be.

1.1. Classification of Inspection

The purpose of visit is most crucial aspect of an inspection. Based on the visit objective, inspections are classified into following five classes,

Class A	Compliance verification of industrial units, environmental infrastructure facilities like CETPs, STPs, CHWTSDF, CHWIF, CBWTF, etc.
Class B	Follow-up visits for compliance verification or status of directions issued
Class C	Complaint investigation
Class D	Legal Matters or visit in compliance of orders passed by Hon'ble Courts / NGT
Class E	Visit as a part of study or a research project

2. PRE- INSPECTION PHASE

It is very important for the inspecting official to be clear about the class of visit as mentioned above before starting the inspection. During pre-inspection phase, based on the class of inspection, following requirements should be worked out,

- Sampling requirement (emissions, ambient air, water, wastewater, noise etc.)
- Requirement of manpower for field support
- Time frame for completing the visit and report preparation
- List of documents and information required to be collected
- Requirement of expert from other institutes or additional laboratory support, as needed

The surprise element of an inspection is paramount. The timing of inspection especially those to check regulatory compliance should be unannounced and difficult to anticipate. The element of surprise should be maintained at all times except situations where the same is not necessary such as project visits, etc.

3. STANDARD INSPECTION PROCEDURE

3.1. Standard Inspection Procedure for Class A Inspections: Compliance verification of industrial units, environmental infrastructure facilities like CETPs, STPs, CHWTSDF, CHWIF, CBWTF

Inspection of industrial units and environmental infrastructure facility for compliance verification is classified under Class A. The main objective of Class A inspection is to verify compliance to regulatory standards as per G.S.R. notification or consent issued (whichever stringent). In case consent doesn't cover all notified parameters G.S.R. notification may be referred. Further, other applicable rules, to be complied by industrial unit & common environmental infrastructure facilities may be verified.

<u>The inspections are conducted based on a random computer generated roaster at CPCB Headquarters for Regional Directorates, using OCEMS data.</u>

Steps to be followed during such inspections are as follows:

Step 1	The team leader of the inspection team should access real time monitoring data available on portal by accessing http://rtdms.cpcb.gov.in and review the same to (i) get acquainted with the status of operation of system connected with stacks and parameters to be monitored (ii) status of ETP outlet and parameters to be monitored (or) PTZ camera connectivity in case of Zero Liquid Discharge (ZLD) units etc. and assess the need of sampling during this pre-inspection phase. Accordingly, a sampling plan should be chalked out. It will help optimizing utilization of available resources on field.
Step 2	On reaching the site, inspecting team should take a tour of periphery of the unit (if feasible) for visual observations. In case of any suspicious discharges or dumping observed, photographic evidences or sample (as required) should be collected and discussed with representative of the unit.
Step 3	The inspection team should take the photograph of the display board placed at the entrance of the unit, also regarding hazardous waste.
Step 4	The inspecting team should explain the purpose of inspection to the representative of the unit and collect a copy of consent and authorization issued by SPCB/PCC. Notice for sampling should be served to the industrial or common facility as per provisions of The Water (Prevention & Control of Pollution) Act, 1974 and The Air (Prevention & Control of Pollution) Act, 1981.
Step 5	The safety issues related with field inspection of the premises and necessary requirement of manpower support, power supply arrangement, laboratory assistance, if any, should be discussed with the representative of the unit before start of monitoring.

Step 6	**Wastewater Management & Monitoring** • The team should first collect a grab sample from final outlet of ETP and record OCEMS readings in case of effluent monitoring. Thereafter, physical inspection should be conducted at each stage of ETP, operational process flow diagram of Effluent Treatment Plant (ETP), flow meter readings and other physical operating conditions to be noted. The team can then collect grab sample from the inlet of ETP. If required, the team may collect any intermediate sample or bypass sample based on field conditions. • The sampling location may be considered preferably where the sensors for OCEMS are placed. However, based on the field conditions sample from equalization tank and final outlet of ETP (if different with the sensor location) may also be taken and reason for same may be record. • The sample collected should be preserved for the parameters to be analyzed. The selection of parameters should be based on the specific parameters for the type of unit, as per consent conditions and OCEMS protocol. • In case, effluent sample is not collected during visit, reason for the same should be recorded. • Segregation and management of high strength and low strength wastewater streams, if any, should be discussed and physically verified with records of same. • In case of ZLD, the condition specified in the Consolidated Consents and Authorization (CCA) for the use of treated water should be examined and accordingly sampling may be carried out. The ZLD should be physically inspected and records pertaining to use of treated water, generation and disposal of salt etc. should be collected. Specific observations and records for treatment and disposal of concentrate generated from MEE/ reject from RO/ salt from Agitated Thin Film Dryer (ATFD) etc. should be noted. In case of bypass or unauthorized discharge (if any), photographic or video graphic

	evidence should be taken and samples of such stream should be collected. The monitoring should be done as per CPCB guidelines (see appendix). Observation and records with respect to source of water, water consumption, wastewater generation & disposal, operational status of ETP, operation & maintenance of ETP, ETP sludge management, dewatering system, storage area condition, record keeping mechanism, etc. should also be noted.
Step 7	**Emission Monitoring** • The stack to be monitored should be identified based on process, physical observation and OCEMS record. It should be monitored as per CPCB Emission Regulation Part III for parameters of concern. Monitoring of all stacks during inspection may not be feasible if numbers of stacks are more as in case of large scale industries such as refinery, chemical complex, iron & steel industries, etc. and therefore selection of potential stacks to be monitored during visit based on field condition is very important. • The monitoring can be suspended if safety provisions for source emission monitoring are not present or found unsafe for use of inspecting officials (refer CPCB Emission Regulation Part III). Photographs and short video should be taken as evidence for initiating action against the unit. • For specific field observation photographic and videographic evidences should be collected. • The inspecting team should make observations on the Air Pollution Control Devices installed, its operational status, type of fuel used in process and its average consumption, storage and disposal of ash & residue etc. and duly recorded. pH of scrubbed liquor tank should be checked, as applicable.

	• During sampling, the present operational load should essentially be recorded.
Step 8	**Specific Observation Regarding OCEMS installed** • Verify details such as device make, ID etc. provided on Registration Portal with the actually found during inspection. • Verify the compliance in terms of parameters monitored for emission and effluent as per OCEMS protocol. • The location of online analyzers should be carefully noted with reference to the objective of OCEMS. • OCEMS parameters value should be noted during the period of monitoring for ensuring proper functioning of OCEMS, supported by photographic evidence. • Collect records of calibration certificate / system performance certificate. • Record data storage & data retrieval status. • The gas cylinders used for calibration of analyzers (if available) should be checked for its expiry date. Record reason and duration of non-functioning of OCEMS, if any.
Step 9	**Hazardous Waste Management** Inspection of hazardous waste storage area/shed should be carried out. Observations with respect to generation, disposed & stored quantity, physical condition of storage area etc. with respect to authorization conditions should be recorded and supported by photographic evidence.
Step 10	The inspecting team should take photographic/video graphic evidence during inspection. The indicative evidence should be collected under various subsections of section 10 of The Environment (Protection) Act, 1986. However, in case of restriction of occupier on photography, the unit should

	be requested to arrange relevant photographs during the time of inspection and collected after completion of inspection. If neither of the above is permitted, then it should be construed as a denial of access.
Step 11	After completion of monitoring, observations regarding process area, hazardous waste storage area and overall environmental management in the unit should be recorded.
Step 12	Before concluding the inspection, it is to be ensured that: ✓ Copy of CCA, records, certificates as per requirement of the format for standard inspection **(Annexure I)** and applicable information as per list of documents (**Annexure II**) is collected. ✓ Duly signed and stamped carbon copy of Form-I "Notice of Intention to have sample analyzed" **(Annexure III)** is collected**.** If there is any specific observation related to sampling process like unable to collect sample (air/water) due to lack of proper infrastructure facility, sample collected from unauthorized discharge etc., the same should be mentioned in the Notice of Intention to have sample analyzed. ✓ All required samples are collected, labeled, preserved, sealed and stored properly. Details regarding sample code and sampling location should be noted carefully with values of onsite measured parameters like pH/Temperature etc. ✓ Observations and evidence in support of status of APCDs, ETP, HW handling, OCEMS, bypass and non-compliances are collected.
Step 13	**Post Inspection Phase**: *Refer Section 4 of this document.*
Step 14	**Report Preparation** The report should be prepared as per standard inspection format (**Annexure-I**) enclosing supporting evidence and record. The report should be clear in terms of observation, compliance status and recommendation. The observation part should cover following aspects:

	Specific Observation • Observation pertaining to operational status of the unit, status of CCA, status of production on the date of inspection, annual production record with respect to the CCA condition. • Specific irregularity with respect to bypass discharge or emission observed prior entering the premises of unit with photographic evidence. • Observation pertaining to status of display board at the entrance with photographic evidence. • Observation pertaining to unit specific parameters, OCEMS connectivity & calibration status, cross-verification of physically monitored data, OCEMS values recorded during visit and archive data on portal. • Observation regarding status of operation of ETP, water consumption & wastewater generation compared with CCA condition, comparison of ETP capacity with respect to wastewater generation, compliance status based on sampling and analysis, O&M issues, record keeping, evidences and justification (sample of bypass collected or no sampling done, etc.) should be incorporated. • Observation regarding fuel type &consumption compared with CCA condition, air pollution control devices, stack details available compared with CCA condition, compliance status based on sampling and analysis, fly ash management, record keeping, evidences and justification (selection of stacks for monitoring or no sampling done) pertaining to compliance of emission management should be incorporated. • Observation regarding hazardous waste management such as storage facility, storage condition, record keeping, filing annual return, membership of CHWTSDF, evidences and justification pertaining to compliance of hazardous waste management should be incorporated.

	General Observation • Observations pertaining to overall housekeeping (comments on access to various area, storage of materials and waste, spills or leakages, etc.) with evidence. • Other observations, if any, pertaining to best environmental management practices, discrepancies or gaps in the conditions of CCA etc. **Conclusion & Recommendation** The conclusion of report should clearly summarize observed compliance status and actions required to be taken. In case of gross violation such as illegal discharges/emissions, dumping of waste with potential to cause grave injury to environment, the same should be categorically mentioned.

The above tabulated steps are also applicable to compliance verification inspections of common environmental infrastructure facility. In case of inspection of hazardous waste disposal site or a TSDF, record of waste stabilization, leachate test, conformance of leachate characteristics with leachate standards and testing of all notified parameters may be done. In addition, individual guidelines/ set of instructions for monitoring of common environmental infrastructure facilities may be followed.

3.2. Standard Inspection Procedure for Class B Inspections: Follow-up visits for compliance verification or status of directions issued

Re-inspection of any industrial units or common environmental infrastructure facility for compliance verification of the directions issued by CPCB is classified under Class B. The main objective of class B inspection is (i) to verify the compliance to CPCB directions issued for taking corrective & preventive measures and (ii) to verify compliance status submitted by the unit to CPCB.

It was found in many instances that the industrial unit submits compliance report to CPCB (headquarters) before actually complying with the directions and when the inspecting team visits the premises it is found that the compliance is under progress or not initiated yet. This results in repeated visits to the unit resulting in wastage of time, energy and resources. Hence, thorough examination of Action Taken Report submitted by industry is very important.

Following steps should be followed during such inspections,

Step 1	The Team leader of the inspection team should collect available information about the industrial unit(s) to be re-inspected. The team should collect copy of previous inspection report, directions, consent & authorization and compliance report submitted by the unit. All available documents should be examined properly during pre-inspection phase to check point wise compliance status to the directions issued. Accordingly, a sampling plan should be prepared comprising (i) previous non-compliant stacks & discharge points (ii) Parameters of concern which should be monitored and/or parameters found exceeding during previous inspections (iii) Any intermediate sampling points for cross verifying compliance claims (iv) Ambient air quality, fugitive emission, visible emission, ground water, noise, soil sampling as needed for point wise compliance verification. In case partial compliance is observed, the fact should be brought to the notice of concerned Divisional Head (DH) at CPCB Headquarter and Regional Director for deciding further course of action. If it is noted that already two follow-up visits have been conducted for the same unit (in quick succession or within a frame of an year), it should be brought to notice of concerned Divisional Head (DH) at CPCB Headquarter and Regional Director for deciding further course of action.
Step 2	On reaching the site, inspecting team should take a tour of periphery of the unit (if feasible) for visual observations. In case of any suspicious discharges or dumping observed, photographic evidences or sample (as required) should be collected and discussed with representative of the unit.

Step 3	The inspection team should take the photograph of the display board placed at the entrance of the unit in compliance of order of Hon'ble Supreme Court in the matter Writ Petition no. 657/1995.
Step 4	The inspecting team should explain the purpose of inspection to the representative of the unit and collect a copy of consent and authorization issued by SPCB/PCC. Notice for sampling should be served to the industrial unit or common facility as per provisions of The Water (Prevention & Control of Pollution) Act, 1974 and The Air (Prevention & Control of Pollution) Act, 1981.
Step 5	The safety issues related with field inspection of the premises and necessary requirement of manpower support, power supply arrangement, laboratory assistance, if any, should be discussed with the representative of the unit before start of monitoring.
Step 6	Based on decided sampling plan, point wise compliance verification of the unit may be done, as per steps detailed under **Class A** inspection table. The monitoring should be done as per CPCB guidelines (see appendix). All physical progress observed should be recorded with photographic & document evidences.
Step 7	**Post Inspection Phase:** *Refer Section 4 of this document.*
Step 8	**Report Preparation** The main objective of a Class B inspection is compliance verification to directions issued by CPCB. Hence, clear concise point wise compliance status as on date of visit should be prepared. The structure of such report may be as follows: • **Background:** Transitory reference to the matter, chronology of event, directions issued, compliance status submitted by unit, purpose of visit,

	reference, team members, date of visit and representative of unit present during visit may be included in the report. • **Compliance status:** Provide point-wise compliance status with reference to directions issued and status submitted by the unit to CPCB vis a vis status observed during the present visit. The point-wise compliance status of the unit in terms of complied, partially complied and not complied with CPCB directions should be mentioned exactly in the report. All necessary evidences (documents & photos) in support of findings should be attached. • **Specific Observation:** In addition to above, if any further gross violation observed during the visit or any modification in the process/EMS etc. which was not observed during previous visit, may be informed in the report. • **Conclusion and Recommendations:** The status of compliance may be concluded clearly (compliant, partially compliant or non-compliant to directions) with recommendation on further action. Summarily, the report should suffice all requisites as given in format for revocation of closure direction/show cause notice **(Annexure IV)**.

3.3. Standard Inspection Procedure for Class C Inspection – Complaint investigation

Inspection of any industrial unit(s) or industrial cluster in accordance with grievance raised in a complaint is classified under Class C inspections. The main objective of class C inspection is to investigate the allegations raised by the complainant. Following steps should be followed during such inspections.

Step1	• Based on the issues raised in the complaint, inspecting team should discuss and finalize objectives of investigation. Accordingly, an inspection cum sampling plan should be prepared. The requirement of sampling/monitoring (ambient air/water/stack/noise/fugitive) based on the complaint should be assessed and discussed with concerned DH/RD.

	• If the complaint is area specific such as industrial cluster, the team should explore the area on Google Map (or any similar) for cluster layout, topography, dumps, waterbodies, geographical features or any other useful information. • In case of complaints related to accidental or occasional discharge, supplementary information or status should be ascertained from concerned SPCB/PCC, local authorities, neighbors, etc. preferably along with evidence (if available) for residual effects of such discharge. • If joint inspection is desired along with SPCB/PCC, the same should be communicated and discussed for inspection cum monitoring plan, preparations, availability of resources, etc. for the proposed inspection.
Step 2	The inspecting team should try to contact complainant to discuss and obtain necessary information about specific issues of the complaint.
Step 3	• The monitoring and inspection of the unit should be conducted as per steps detailed under Class A table. • In case of area or cluster specific complaint, monitoring of surface water/ambient air/ noise/soil/ground water or as the case may be should be carried-out as per CPCB guidelines (see appendix).
Step 4	**Ambient Air Monitoring and Noise Monitoring** In case where AAQ Monitoring is required, suitable locations should be selected preferably upwind, downwind directions and/or cross wind direction based on the predominant wind direction for obtaining representative sample due to industrial activity. The sampling/monitoring should be carried out as per CPCB guidelines for AAQ (National Ambient Air Quality Series: NAAQMS/37/2012-13). Similarly, suitable location for ambient noise monitoring should be selected such as away from direct source of noise or vibration, microphone placed 1.2 – 1.5 m above ground level, measuring distance maintained, etc. (see appendix).

Step 5	**Ground Water (GW) Monitoring** In case of ground water monitoring, representative samples may be collected from Tube Well / Open Dug Well/ Peizometric Well located within (or) around the unit/area. Random selection approach may be adopted to select sampling locations for representative samples. Samples from the tube well should be collected after running the well for about 5 minutes. Samples from an open well should be collected about 30 cm below the surface of the water. • Observations about appearance and activities being carried out around the sampling locations, depth, usage, permission from Central Ground Water Authority (CGWA)/ geographical coordinates etc. should be noted. • Indicative photograph of the sampling location should be taken. • Reference sample(s) from probable non-contaminated area should also be taken. • Expert agencies like CGW Board, university or an expert institute can also be engaged, if needed.
Step 6	**Surface Water Monitoring** In case of surface water monitoring, samples should be collected from drains, lakes, pond or river located near the unit. In case of river or drain sampling, the sample should preferably be taken at upstream and downstream of source of contamination to assess any impact due to discharge from unit. Random selection approach may be adopted to select the sampling location for representative sample. Samples should be collected from well-mixed section of water bodies, preferably 30 cm below the water surface. • Observations about appearance and activities being carried out around the sampling locations, usage, geographical coordinates, etc. should be noted. • Indicative photograph of the sampling location should be taken.

	• In case of coastal monitoring, expert institutes like National Institute of Oceanography etc. may be engaged.
Step 7	**Soil Monitoring** In case of soil monitoring, sampling locations should be selected on random basis around the industrial activity or potentially contaminated area. Sampling should be conducted for contaminated soil or agricultural soil, as the case may be. • Reference sample(s) of soil from probable non-contaminated area may also be collected. • Observations about appearance and activities being carried out at the sampling locations, land use, coordinates etc. should be noted. • Indicative photograph of the sampling location should be taken. • Expert agencies like agriculture university or institutes may be engaged, if required.
Step 8	**Fugitive Emission Monitoring** • Work zone/ fugitive emission standards are available for some sectors such as stone crushing, quartz, iron and steel etc. In cases where fugitive and visible emission standards are available (standard notification and/or CCA), sampling may be carried out as per applicable sector specific monitoring guidelines. The sampling location should be identified in 3 – 10 m distance from the source in downwind directions following the standard procedures. Sampling time depends upon the concentration of PM emission from the non-point source. In general up to four hours sampling time can be considered as adequate. • In cases where fugitive emission standards are not prescribed, the sources of fugitive emission like leakages, fumes from the furnace, chemical storage area etc. can be visually identified and monitoring may be done for ambient air quality (if needed). Photographic evidences of fugitive emission discharge should be collected.

Step 09	Before concluding the investigation visit, it should be ensured that all information, documents *(Refer Annexure-II),* evidences, photographs, samples required to address the complaint are collected.
Step 10	**Post Inspection Phase**: *Refer Section 4 of this document.*

Step 11	In case of Class C, wherein reports are required to be prepared based on complaint received, the structure of report should be as follows,
	
	• **Background:** Brief about the complaint, objective of visit, team members, date of visit and name & designation of representative of unit (if any) present during visit
	• **Approach/ Methodology:** Methodology followed while investigating the complaint, sampling details, etc.
	• **About the Area/Unit:** Details pertaining to area or unit inspected, existing situation, pollution control infrastructure, status of consent and authorization, etc.
	• **Observation** *(Refer applicable points of Step 14 of Class A inspection)*:
	  o Observations on specific issues raised in the complaint
	  o Observation on monitoring locations and inferences based on sampling and analysis results with respect to monitoring carried out.
	  o General Observation
	• **Conclusion and Recommendation:** Conclusion should be precise and in line with issues raised in the complaint. Further, status of compliance and recommendations should be suggested.

3.4. Standard Inspection Procedure for Class D Inspections: Legal Matters or visit in compliance of orders passed by Hon'ble Courts / NGT

Inspection of any industrial unit(s), survey and monitoring of area etc. as per the directives of Hon'ble Courts and Hon'ble NGT is classified under Class D. The main objective of class D inspection should be to fulfill the requirement detailed in court's directions.

In class D inspections, there may be requirement of sampling and monitoring different from regular inspections. The objective of inspection may be different from case to case, such as performance evaluation of treatment system, status of ground water in the vicinity of industrial unit/estate, status of soil contamination, status of ambient air quality, impact of discharge on water bodies, estimating environmental compensation, carrying capacity of an area, health impact assessment, etc. depending upon the directions of Hon'ble Courts. In many cases, there are orders constituting committee of the Expert members wherein CPCB has to provide technical and monitoring support. Thus, it is important to carefully examine the directions of Hon'ble Court and prepare a time-bound plan of action with monitoring requirements. In case, need is felt for engagement of external Expert for technical inputs, the same can be hired on case to case basis upon upon ascertaining non-conflict of interest. The assignment will be limited to interpreting orders, work out plan of action, site surveys, report preparation and providing technical inputs to committees formed in compliance to Hon'ble Courts. The terms and conditions are detailed in office order dated January 27, 2020 (Annexure VI).

The sampling should be conducted as per Section 3, 10 & 11 of The Environment (Protection) Act, 1986. The sampling procedure mentioned in the Section 11 of the Environment (Protection) Act, 1986 (read with Rule 11 of the Environment (Protection) Rules, 1986) should be referred. Further, Section 21 of the Water (Prevention and Control of Pollution) Act 1974) and Section 26 of the Air (Prevention and Control of Pollution) Act may also be referred.

Once monitoring plan is finalized, following steps may be followed during field inspections,

Step 1	• The Court orders requiring inspection and report submission by CPCB should be examined carefully by Law Division concerned Divisional Head and Regional Director. • Based on the requirement, the task may be assigned to concerned official for coordinating committee constitution & its proceedings, inspection, survey and report preparation & final submission. If Expert members from other institutes are required, the same should be identified and considered for assignment of work after approval from the Competent Authority.

	• Detailed monitoring plan (no. of samples to be taken, locations/ process unit, manpower & equipment requirement for timely completion of task) may be prepared in consultation with concerned DH and RD. • The coordinating officer should collect relevant information about the area or industrial unit being inspected from available records in CPCB or received from SPCB/PCC and forward same to inspecting team for background information prior to field visit.
Step 2	In case compliance verification of industrial unit(s) is required to be carried out, the inspection protocol as detailed under "Class A Inspection" may be referred. Notice for sampling should be served to the industrial unit or common facility as per provisions of The Water (Prevention & Control of Pollution) Act, 1974 and The Air (Prevention & Control of Pollution) Act, 1981.
Step 3	**Performance Evaluation of CETP** In case performance evaluation of CETP, stage wise sampling may be conducted. If required, composite sampling (time based composite for 8 hours/12 hours/24 hours or as per the need) may be carried out. In addition, grab samples for analyzing MLSS/MLVSS from the aeration tank(s) to ascertain active biomass present in the system may also be collected.
Step 4	The sampling for ambient air quality, surface water, groundwater, soil and noise quality (as applicable) may be carried out as per steps mentioned under Class C Inspection. Detailed monitoring guidelines are placed at appendix.
Step 5	**Post Inspection Phase**: *Refer Section 4 of this document.*
Step 6	The structure of inspection report submitted after legal inspections should be as follows,

	• **Background:** Brief about the case, specific directions, constitution of committee, date of visit and representative of unit (if any) present during visit.
	• **Approach/ Methodology:** methodology followed, monitoring conducted etc.
	• **About the Area/Unit inspected:** existing scenario, pollution control infrastructure, status of consent and authorization etc.
	• **Observation**
	  ○ Specific Issues mentioned in the order
	  ○ Operational status and status of consent & authorization
	  ○ Sampling and analysis results
	  ○ General Observations
	• **Conclusion:** Conclusion should be precise on issues and directions mentioned in the order and action needed for improvement.

The methodology for inspection may vary depending on specific requirement, on case to case basis.

3.5. Standard Inspection Procedure for Class E Inspections: Visit as a part of study / research project

Inspection of industrial unit(s) and common environmental infrastructure facility for development of Standard Operating procedure, guidelines, standards and preparation of Comprehensive Industry Document (COINDS) etc. is classified under Class E. In such inspections, consultative approach with the concerned industrial sector should be adopted and accordingly, a monitoring plan should be prepared and implemented. Notice for sampling need not to be served.

The structure of report should include objectives of the study, approach, sampling & analysis observations and findings.

4. POST INSPECTION PHASE

After completion of inspection it is to be ensured that the collected samples are labeled, preserved and stored safely. Each sample should be secret coded by the team leader. To maintain integrity and identity of samples till the issue of test reports, it should be ensured that it is sampled, preserved and handed over in laboratory as per standard procedure. The sample procedure for the Trace Organic Laboratory can be accessed through, https://cpcb.nic.in/uploads/Laboratory/Trace-Organic/procedure_tol_2020.pdf

During post inspection phase, following actions are required to be taken,

- After leaving the unit premises, the inspecting officer should inform over the phone to the concerned laboratory regarding number of samples, likely sample matrix and parameters to be analyzed. The samples collected during inspection should be submitted for analysis (as per methods specified in scope of accreditation) to a laboratory recognized under the E (P) Act by MoEF&CC as soon as possible so that the chances of analytical loss / error can be minimized. The samples should be submitted to the laboratory along with the information filled in the requisition format.
- In case the samples arrive in the laboratory during non-official hours, the samples should be submitted to the concerned laboratory and requested to store in cold condition/refrigeration/cold room of the laboratory. In case of any critical parameters, laboratory In-charge may be requested to depute analysts immediately irrespective of non-working day.
- Laboratory may take 5 to 7 days for analysis and compilation of general parameters and 10 to 15 days for specific parameters like heavy metals, pesticides etc. The laboratory should prepare the analysis results and provide signed copy to leader of the inspection team.
- On receipt of analysis results, the inspection team should verify the analysis results based on the field parameters recorded. In case of any doubts, the same should be clarified immediately with laboratory in-charge.
- Based on the class of inspection, the inspection report should be prepared by incorporating analysis results and its inferences and submit to concerned division at CPCB HO through email and hard copy.
- In case any information could not be obtained during the visit, the same can be collected from the unit via email or courier within 07 days.

5. SUBMISSION OF INSPECTION REPORT

The inspection report submitted by inspecting team should clearly conclude compliance status and recommendations for measures required to be taken by the unit. The report should enclose complete information and supporting evidence for ease of verification during follow-up visits. The specific format for standard surveillance inspection **(Annexure I)** and a general format for other inspections **(Annexure V)** is enclosed with this document for ready reference. The inspection report should be reviewed by concerned Regional Director (RD), a conclusive note of RD should be added to the inspection report and submitted to CPCB Headquarters for further necessary action. Conclusive note of RD shall not be required in case of report submitted by any joint committee in legal matters.

The concerned Divisional Head (DH) on receipt of inspection report should review the observations and recommendations of the inspecting team and conclusive note of RD. The DH should put up a detailed note clearly mentioning important facts in the matter in chronological order, his/ her observations on status of compliance and proposed action in line with 'Compliance Assessment Methodology' presented in subsequent section.

In case of any discrepancy found in inspection report, concerned RD may be immediately contacted and the same should be clarified for processing without any delay.

In case of gross violation detected by a team leader while inspecting an industrial or common infrastructure facility causing severe harm to environment that needs to be stopped immediately, necessary actions shall be taken to issue interim orders to close down the unit. The same shall be followed by a formal procedure including filing inspection report with proper justification on the need for immediate action.

Note :

1. Inspection reports shall be prepared and submitted by the inspecting team within three days of completion of inspection in cases where sampling & lab analysis is not involved. In cases where samples have been collected, lab analysis should be completed within seven days for general parameters and fifteen days for specific parameters like heavy metals, pesticides, etc. and report submitted within next three days.

2. The concerned Divisional Head/ RDs shall propose action within three days of receipt of inspection report from inspecting team.

6. COMPLIANCE ASSESSMENT AND DIFFERENT LEVEL ACTIONS

The emission & effluent standards for various industrial sectors are notified under Environmental (Protection) Act, 1986 to ensure that under certain operating conditions emission/ effluent concentration doesn't exceed the set values attainable with available pollution control technologies. There are various air and water quality parameters notified for industrial units and common facilities.

Once parameters are monitored and analyzed, the concentration values may be verified with the stipulated standards (GSR Notification, BIS drinking water standard, etc. as applicable). Further action may be recommended based on nature of violation after thorough evaluation of inspection report; the action proposed to be taken against unit is detailed as follows,

6.1. LEVEL I – Directives in the Form of Letter

Directives in the form of letter maybe issued to the unit to carry out recommended tasks immediately for improvement of general operations, environmental conditions and ensure continuous compliance of the same in case of following non – compliances,

1. Name & Address of unit not displayed at the entrance.
2. Lacking or mismanaged log or record book for water and wastewater management, energy and chemical consumption in ETP & APCD, hazardous waste disposal records etc.
3. Improper housekeeping, improper solid waste management (improper in-house dumping or stacking of solid waste).
4. No energy meter at ETP and APCD.
5. Hazardous waste display board provided but not updated.

6.2. LEVEL II – Directives in the form of directions to SPCB/PCC

In case of following, direction under Section 18(1) (b) of the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981 may be issued to concerned SPCB/PCC,

1. The unit found operational without valid CCA.
2. Discrepancy with respect to notified discharge standards observed in the consent issued by SPCB/PCC (Latest Notified Standards not prescribed/relaxed standard etc.).
3. Non-compliance of similar nature observed during inspection of industries in a cluster or industrial estate.
4. Non - compliance observed in an industrial unit or common infrastructure facility requiring intervention at State level.
5. Discrepancy in environmental management infrastructure by State Authorities.
6. Issues related with State policy.
7. Production exceeding consented quantity or product manufactured not mentioned in CCA.
8. The wastewater discharged beyond consented quantity.

6.3. LEVEL III – Technical Directives to unit in form of Section 5 of the Environment (Protection) Act, 1986

The technical directions under Section 5 of the Environment (Protection) Act, 1986 may be issued in following cases where an opportunity may be given to unit to improve its existing infrastructure and environmental management practices,

1. Pollution control devices provided but are inadequate in treating the emission/ effluent discharge due to technical glitch or logistic issue.
2. Exceedance of less than 50% notified parameters beyond permissible limit but within 1.5 times of the stipulated standards*
3. D G set operating without acoustic enclosures or inadequate stack.
4. OCEMS found at improper location/ disconnected / partial OCEMS / tampered including GPIs of Ganga basin, air polluting industries in NCR and 17 category industries
5. Poor Operation & Maintenance of ETP (e.g. MLSS below designed level in Aeration tank of ASP) including non-functional aerator / pump / standby provision (s) and air pollution control devices.

6. Improper monitoring location (such as location of Port hole) in the stack, stack height not as per consent, not having adequate platform and not having easy accessibility to ETP / APCD for effluent/emission sampling & observation.
7. Unauthorized disposal of hazardous waste or inadequate hazardous waste storage capacity or violations of conditions of authorization not leading to severe injury to the environment

** Exceedance in any one of notified discharge parameters is non-compliance, however the action taken is proposed in accordance with number of parameters and degree of exceedance.*

6.4 LEVEL IV – Directives in the form of show cause notice under section 5 of the Environment (Protection) Act, 1986 for time bound actions

Show Cause Notice for closure under Section 5 of the Environment (Protection) Act, 1986 for time bound actions may be issued in case of following non – compliances not leading to grave injury to environment,

1. Repeat non-compliance to observations in Level II and III categories
2. Provision for dilution or addition of fresh water at any stage of ETP.
3. Exceedance of more than 50% notified parameters beyond permissible limit but within 1.5 times of the stipulated standards*
4. Non-complying with the conditions imposed during revocation of earlier directions issued.
5. Non-installation and non-connectivity of OCEMS as per CPCB direction even after level III technical directions.
6. Non-compliance to ZLD norms or dry unit found operating wet process.
7. Discharge of highly acidic or alkaline wastewater (pH<3 or >10) into natural body

** Exceedance in any one of notified discharge parameters is non-compliance, however the action taken is proposed in accordance with number of parameters and degree of exceedance*

6.5 LEVEL V – Directives in the form of closure directions under section 5 of the Environment (Protection) Act, 1986

Closure direction under Section 5 of the Environment (Protection) Act, 1986 may be issued without providing an opportunity to file objections, when an industrial unit is found grossly

non-complying with regard to prescribed discharge standards and other shortcomings which have potential to cause grave injury to the environment. Such gross non-compliances include,

1. Any bypass discharge of partially treated or untreated effluent and emission observed.
2. Injection of treated or untreated water or both into ground water (reverse boring).
3. Operating unit having defunct ETP or APCD and/or operating without installation of ETP or APCD.
4. Unauthorized disposal or dumping of hazardous waste likely to cause grave injury to environment.
5. Non-compliance to level IV show cause notice.

The level V closure directions under section 5 of the Environment (Protection) Act, 1986 may be proposed after exercising utmost prudence. The proposing official should clearly establish the ground for closure directions and support with scientific evidence that the violations of the unit have caused grave injury to the environment.

7. PROTOCOL FOR APPROVAL OF ACTION

7.1. Proposal for action

Based on the category of violation (as mentioned above), the concerned DH should propose action for approval of competent authority by putting note clearly mentioning the following,

1. Important facts in the matter in chronological order
2. Tabulate compliance verification with clear conclusion regarding compliance status
3. Propose action in the matter on the basis of set of recommendations given in the inspection report and level of non-compliance as mentioned above.
4. Specific guidelines which were considered for proposing the action
5. Summarize note with proposed action along with justification, not mere mention of level of non-compliance.

In case direction is proposed to be issued, the draft direction should clearly include,

1. Regulatory power and requirements

2. Chronology of events
3. Specific Observation and recommendations for the proposed directions
4. Proposed direction with time frame for its compliance and Environmental Compensation / Bank Guarantee as applicable.

7.2. Issuance of Directions

After approval of proposed directions from the competent authority, the signed copy of the direction should be issued. The copy of directions should also be mailed to concerned parties for compliance.

Level V	**Closure directions under Section 5 of the Environment (Protection) Act, 1986 to the industrial unit or common facility** Copy of direction for compliance to Electricity Board/power supply agencies for disconnection of power supply and Water Supply Board for disconnection of water supply. Copy of directions should also be sent to concerned Regional Directorate CPCB, concerned SPCB/PCCs & district administration for information and Divisional Head IT, CPCB, Delhi.
Level IV	**Show cause notice under Section 5 of the Environment (Protection) Act, 1986 to the industrial unit or common facility** Copy of notice should also be sent to concerned Regional Directorate CPCB, concerned SPCB/PCCs & district administration for information and Divisional Head IT, CPCB, Delhi
Level III	**Technical Directives to unit in form of Section 5 of the Environment (Protection) Act, 1986** Copy of notice should also be sent to concerned Regional Directorate CPCB, concerned SPCB/PCCs & district administration for information and Divisional Head IT, CPCB, Delhi

Level II	**Directions under section 18(1)(b) of the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981 to SPCB/PCC** Copy of directions should also be sent to concerned SPCB/ PCC, concerned Regional Directorate CPCB & district administration for information and Divisional Head IT, CPCB, Delhi
Level I	**Letter to the industrial unit or common facility for action and compliance** Copy of letter should be sent to concerned SPCB and Regional Directorate CPCB for information.

8. PROTOCOL FOR FOLLOW - UP AND REVOCATION OF DIRECTIONS

The follow up procedures starts with written communication from occupier of industrial unit on actions taken in pursuant of directions. The concerned division should conduct preliminary analysis of submissions according to direction or letter issued to the unit. In case, two follow up visits have already been done, next visit shall be done jointly by concerned official from Head Office and RD. The table given below can be referred for guiding further course of action. The decision matrix algorithm succeeding the table may also be used.

Information processing and sequence of action to deal with matters related with violation/ non-compliance

Level of Direction	Prerequisite to ensure compliance (to be provided / submitted by industry/SPCB/PCC to CPCB)	Action on receipt of information/ follow-up at CPCB HO	Action from CPCB Regional Directorate
Level V Closure Direction u/s 5 of E(P) Act, 1986	The occupier to submit duly notarized copy of status of compliance to all directions and self-certificate of closure compliance to CPCB, which may also be verified by SPCB/PCC.	After examining the status of compliance report submitted by the occupier, the concerned DH should put up the recommendation for conditional revocation as per the format given in **Annexure IV.** Based on the status of compliance, conditional revocation may be given for 90 days with a copy to concerned RD to revisit for compliance verification. After receiving satisfactory compliance report from RD, the closure direction may be put up for revocation.	**A team from concerned RD should visit and verify the compliance within 90 days of conditional revocation.**
Level IV **Show cause notice u/s 5 of E(P) Act, 1986** **Level III Technical Directions u/s 5 of E(P) Act, 1986**	The occupier to submit duly notarized point wise reply along with measures taken in compliance to all points mentioned in the notice/ directions.	The concerned DH to examine the status of compliance report submitted by the occupier and prepare point wise status of compliance. The DH after approval from competent authority should communicate the same to concerned SPCB/PCC for verification of measures taken by the occupier in	**RD should follow-up with the concerned SPCB/PCC for compliance verification report.**

		compliance with the show-cause notice. A copy of the letter should also be sent to concern RD for follow-up with SPCB/PCC.	
Level II	The SPCB/PCC should submit the Action Taken Report on receipt of directions from CPCB in time bound manner.	The concerned DH should examine the status of compliance and further follow-up may be done.	**Concerned DH and RD to follow up with SPCB.**
Level I	The occupier to submit point wise reply along with measures taken in compliance of all the directions.	The concerned DH to examine the status of compliance and if required further follow-up inspection may be carried out.	--

The CPCB has constituted Three Member Committee for revocation of direction comprising the Member Secretary CPCB, the concerned Divisional Head and the representative from MoEF&CC for relevant industrial sectors. Based on the compliance status received, the DH should put up the status (as per **Annexure IV**) for further appropriate action, conditional revocation or closure revocation to Three Member Committee for decision in case of closure directions. The committee shall examine and accordingly conditional revocation or revocation of closure directions be done.

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****** THINGS TO REMEMBER******

The inspecting officials/ staffs shall strictly remember and adhere to the following:

1. All members of the inspecting team should maintain secrecy of the inspecting schedule. The integrity and dignity of the inspecting team is most important.
2. The team coordinator should become thoroughly familiar with applicable Environmental Standards and Guidelines of respective industrial sector.
3. The team coordinator should carry formats, reference reports, copy of directions, stamp, carbon paper and required no. of copies of Form-I (Annexure III).
4. The inspecting officials/ staffs should check the fitness of monitoring equipment & instrument and carry set of preservatives, sealing kit, requisite PPEs, notepad, pen, first-aid kit etc. before leaving the office.
5. The inspecting officials/ staffs should be respectful to the occupier of facility and mindful of rights of occupier as stated in the Air Act, 1981, the Water Act, 1974 and the E (P) Act, 1986.
6. During monitoring, all team members should carry office ID card and wear monitoring shoes.
7. It should be ensured that environmental sampling and monitoring is carried out as per CPCB guidelines and inspection protocols.
8. Before entry into the premises of industry, effort should be made to purchase & keep ice in ice-boxes for preservation of samples.
9. The entire exercise should be carried out in team spirit and all instructions by the team leader/coordinator should be followed.
10. The inspecting officials/ staffs should refrain from providing information on specific commercial consultant services, or recommending a specific product or consultant providing a service.
11. The inspecting officials/ staffs should refrain from divulging information that could be classified as confidential business information.
12. The contact number of concerned Divisional Head should be carried for clarification regarding visit/sampling, if any, during visit.
13. Record of inspections made and communication issued or received should be maintained.

ANNEXURE I

CENTRAL POLLUTION CONTROL BOARD

REPORT ON VISIT TO INDUSTRY UNDER STANDARD SURVEILLANCE PROGRAMME

Sr. No.	ITEM(S)	DETAIL(S)
1.	Name/Address	
2.	Telephone / e-mail	
3.	Date of Visit	
4.	Purpose of visit	
5.	**Industry Details**	
6.	Status of Display Board at the entrance gate (as per Hon'ble Supreme Court order in WP 657/1995)	
7.	Category & year of establishment	
8.	Products & Production capacities	
9.	Status of the Consents (Consolidated Consent & Authorization) issued by SPCB	
10.	**Effluent Management**	
11.	Water consumption, effluent generation and ETP capacity	**Fresh Water Consumption**: **Effluent Generation:**

		ETP Capacity:
12.	Name of the treatment units in the system (ETP) & Operational Status	
13.	OCEMS details such as device make, models, IDs, etc. provided on CPCB registration portal	
14.	Supplier/service provider	
15.	Location of OCEMS	
16.	Operational status	
17.	Operating principle	
18.	Calibration Status	
19.	Sampling Locations (Sampling for OCEMS applicable parameters-industry category wise)	

<table>
<tr><td>20.</td><td>Monitoring Results</td><td><table>
<tr><th>Parameters</th><th>Inlet</th><th>Outlet</th><th>MPCB Norms</th></tr>
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<tr><td>21.</td><td>Effluent Standards as per CCA issued by SPCB</td><td></td></tr>
<tr><td>22.</td><td>Compliance/Non-compliance</td><td></td></tr>
<tr><td>23.</td><td>Disposal of Treated effluent (Member of CETP/ZLD/other)</td><td></td></tr>
<tr><td>24.</td><td>On-line data corresponding to the period of inspection.</td><td></td></tr>
<tr><td>25.</td><td>Certificates, if certified for the performance of the instruments/ analyze</td><td></td></tr>
<tr><td>26.</td><td>Issued related to data connectivity.</td><td></td></tr>
<tr><td>27.</td><td colspan="2">Emission Management</td></tr>
<tr><td>28.</td><td>Detail of Emission Control system</td><td></td></tr>
<tr><td>29.</td><td>Operational Status</td><td></td></tr>
<tr><td>30.</td><td>Stacks provided with OMS system</td><td></td></tr>
<tr><td>31.</td><td>Adequacy of the ECS (Adequate / Not adequate)</td><td></td></tr>
<tr><td>32.</td><td></td><td></td></tr>
</table>

	Operational Status of online emission monitoring system	
33.	Name and Address of Power Supply Agency	
34.	Name and Address of Water Supply Agency	
35.	Calibration Status	
36.	Hazardous Waste Management	
37.	Whether ONSITE/OFFSITE emergency plan prepared (Yes/No)	
38.	Whether Public Liability Insurance taken (Yes/No/Not Applicable)	
39.	Observations:	
40.	Recommendations:	
41.	Name(s) of visiting officials:	

ANNEXURE II

List of Documents to be collected during visit

The following records (stamped and signed copy) should be collected (in general) for all inspection. However, based on the objective of inspection or any specific requirement, other related documents/records may also be collected for evidence and reference,

1. Copy of Consolidated Consent and Authorization (CCA)/Consent to Operate issued by respective SPCB.
2. In case the CCA/Consent to Operate is invalid, a copy of application for renewal of consent along with the old consent.
3. Consolidated annual production record for last financial year and monthly production records for current financial year.
4. Consolidated Annual Water consumption and wastewater treated or wastewater discharge to CETP for last financial year and monthly production records for the same for current financial year.
5. List of raw materials used in the process.
6. Annual fuel consumption and monthly records for the same for current financial year.
7. Production details and water consumption records for the day of inspection.
8. Copy of latest Water bill and Electricity bill/PNG Bill.
9. Manufacturing Process description/process flow diagram of the entire unit.
10. Flow diagram and Design details of the Effluent Treatment Plant.
11. Air Pollution Control Devices and stack details of the unit.
12. Public liability insurance coverage certificate.
13. Copy of Annual return of Hazardous waste.
14. Copy of randomly selected manifest as per Hazardous & Other Waste (Management & Trans-boundary Movement) Rules, 2016.
15. Copy of environment statement for the last financial year.
16. Copy of membership certificate from CHWTSDF/CHWIF/CETP.
17. Copy of NOC from CGWA for extraction of ground water.
18. Copy of fly ash utilization statement.
19. Copy of calibration certificate, Type approval/Performance certificate for OCEMS related instruments.

ANNEXURE III

FORM I

(See rule 7 of the Environment (Protection) Rules 1986)

NOTICE OF INTENTION TO HAVE SAMPLE ANALYSED

To .....

.....

.....

Take this notice that it is intended to have analysed the sample of ..... which has been taken today, the ..... day of .....20.....from.....

.....

.....

(Name and designation of the person who takes the sample)

_____ *Specify the place where the sample is taken.

(SEAL)

DATE

ANNEXURE IV

CPCB

SAMPLE FORMAT FOR REVOCATION OF CLOSURE DIRECTION/ SHOWCAUSE NOTICE ISSUED UNDER SECTION 5 OF THE E (P) ACT, 1986

1.	Name and Address of unit	
2.	Sector	
3.	Date of Closure Direction/ Show cause Notice	
4.	Causes for issuing Closure Direction / Show cause Notice	
5.	Compliance to Directions	

Directions	Compliance Status submitted by unit	Compliance status verified by CPCB	Process of verification

6.	Compliance status of the unit as per Guidelines for Revocation of Directions/ Notices
7.	Relevant documents submitted as per Guidelines for Revocation of Directions/ Notices

DECLARATION

I ....., Divisional Head ..... have gone through all the relevant documents including certificates, reports, datasheets, photographs, plans, etc. submitted in the matter and am convinced that unit has complied with (i) Directions issued vide letter dated..... (ii) Conditions stipulated in the Guidelines for Revocation of Closure Directions & Show cause Notices issued under Section 5 of Environment (Protection) Act, 1986 (iii) Possess valid Consent To Operate under The Water Act, 1974 and/ or The Air Act, 1981, or renewal application (if valid consent not available).

In view of above, I recommend revocation of Directions/ Show cause Notice dated..... issued under Section 5 of The Environment (Protection) Act, 1986.

(Signature of Divisional Head)

Name:

Date:

ANNEXURE V

CPCB	GENERIC SAMPLE FORMAT		
A	**GENERAL INFORMATION & PRODUCTION DETAILS**		
1	Name and Address of the industry		
2	Type of Industrial Sector		
3	Status of Operation		
4	Name of the occupier/contact person & Designation with a. Telephone / Mobile b. Fax c. e-mail		
5	Date of inspection/monitoring		
6	Date/Year of commissioning		
7	Installed production capacity(TPD) for each product		
7a	By products production (TDP) at full capacity		
8.	Present production of Products		
8.a	Present production of By products		
9	Manufacturing process details & flow diagram		
10	Raw material consumed in Tons per Ton of product		
11	Total water requirement (m^3/day)	• Process	
		• Utilities	
		• Domestic	

			• Others	
			Total	
12	Sources of water			
B	**WASTEWATER – GENERATION & TREATMENT**			
14	Wastewater generation		As per consent	Present status
	• Process effluent • Domestic wastewater			
	Total			
15	Description of Effluent Treatment facilities with design details		Enclose ETP flow chart	
16	Mode of final effluent discharge			
17	Quality of discharged effluent (analysis results of effluent samples collected during inspection)			
C	**AIR POLLUTION – EMISSION SOURCES & CONTROL**			
18	Sources of air pollution	Air pollution control devices / control mechanism	Emission Concentration	Specific remark
	Stack emissions – a. Process b. De-dusting c. Any other		mg/Nm^3	Stack details, process connected, etc.
	Fugitive emissions –		$\mu g/m^3$	Distance of measurement, prominent polluting activity in vicinity, etc.

	Any other emission measurements as specified in notified norms (visible fugitive emissions, etc.)			
	Ambient air quality		$\mu g/m^3$	Distance from industrial facility, etc.
19	Details on hazardous wastes and other solid waste generation			
	Type of Wastes	Quantity generated	Storage & Disposal	
D	**STATUS OF VALIDITY & COMPLIANCE OF CONSENTS AND AUTHORIZATION**			
20	Consent/Authorization	Validity		
i. I	Under Water Act (copy to be enclosed)			
ii. II	Under Air Act (copy to be enclosed)			
iii. III	Hazardous Waste authorization (copy to be enclosed)			
21	**FIELD OBSERVATIONS :**			
	*Refer Step 14 of Class A inspections in Section 3.1 of this document**			
22	**RECOMMENDATIONS**			
23	Name & Signature of the Inspecting Officer (s) Date:			

ANNEXURE VI

OFFICE ORDER

B-12012/189/2019-AS/ 1967 January 27, 2020

Sub. - Engagement of Experts for technical inputs on matters related to Hon'ble Courts - reg.

As approved during 189th meeting of Central Board dated December 17, 2019, senior retired CPCB officials and external experts may be engaged as "Technical Experts' for providing technical support in court matters. The work plan may include interpreting orders, working out plan of action, site surveys (not requiring monitoring), report preparation and providing technical inputs to committees formed in pursuant to orders of Hon'ble Courts.

Terms of Reference

1. Experts shall be hired on case to case basis upon providing undertaking of non-conflict of interest.
2. The ceiling amount for remuneration shall be Rs. 25,000/- per assignment, in addition to travelling expenses as mentioned below.
3. TA/DA shall be reimbursed as per actual or the entitlement in CPCB for Scientist D, whichever is lower on production of tickets/ bills/ invoices for travel. The per day dearness allowance shall be as per rules equivalent to Scientist D.
4. Accommodation shall be reimbursed as per actual or the entitlement in CPCB for Scientist D, whichever is lower subject to production of bills.
5. For each day in field/ meeting, remuneration may be Rs. 5000/- per day (No DA for such days shall be considered). The remuneration shall be paid after production of reports.
6. The remuneration shall not be paid for the time taken by expert in synthesis of reports apart from field visit/ meeting as scheduled by the nodal officer in consultation with Competent Authority.

7. Rs. 5000/- per report shall be paid on lump sum basis for report preparation, stationery and electronic facility used by the expert.
8. Power is delegated to Regional Director and Divisional Head for release of payment to the engaged expert from NGT- EC fund.
9. In case of any disagreement, decision/ interpretation of Competent Authority, CPCB shall be final and acceptable to all.

27/01/2020

(Prashant Gargava)
Member Secretary

Copy to:

- PS to CCB : For kind information to CCB, please.
- All Divisional Heads & Regional Directors
- DH – PCP
- DH – F & A
- DH – IT : With request for uploading order on CPCB website please

APPENDIX

Important web links of CPCB sampling guidelines

1. Emission Regulations Part Three (December, 1985)
   http://cpcbenvis.nic.in/scanned%20reports/COINDS-20%20EMISSION%20REGULATIONS%20PART_3.pdf

2. Manual on Sampling, Analysis and Characterization of Hazardous Wastes
   LATS/16/2002-2003
   https://cpcb.nic.in/publication.php

3. Protocol for Ambient Level Noise Monitoring (July, 2015)
   http://mahenvis.nic.in/Pdf/Report/report_epm_Noise%20Monitoring.pdf

4. CPCB Guidelines for Water Quality Monitoring (MINARS/27/2007-08)
   Soft copy available on https://www.researchgate.net (keyword as above)

5. Guidelines for the Measurement of Ambient Air Pollutants Volume-I & II (May, 2011)
   http://indiaenvironmentportal.org.in/files/NAAQSManualVolumeI-1.pdf
   http://www.indiaenvironmentportal.org.in/files/NAAQSManualVolumeII.pdf