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CP-11/20/2024-IPC-III-HO-CPCB-HO

May 31, 2024

To,

The Member Secretary
Tamil Nadu Pollution Control Board,
76, Mount Salai, Guindy,
Chennai - 600 032

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 Chengalrayan Co-op.Sugar Mills Ltd, Periyasevalai (Po) , Ulunderpet (Tk), Kallakurichi District- 607 209 -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, 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, CPCB issued direction dated 25.05.2018 under section 18 (1) (b) of the Water (Prevention & Control of Pollution) Act, 1974 and the Air (Prevention & Control of Pollution) Act, 1981 to nine (09) SPCBs including Tamil Nadu Pollution Control Boards (TNPCCB) for ensuring safe storage and handling of Molasses by Sugar Mills & Distilleries and to submit compliance to CPCB within 15 days on the receipt of the direction; and

WHEREAS, the inspection of M/s Chengalrayan Co-op.Sugar Mills Ltd, Periyasevalai (Po) , Ulunderpet (Tk), Kallakurichi District (hereinafter referred as 'the Unit') was carried out on 20.03.2024 by the team of CPCB under "Environmental Surveillance of 17 categories of high pollution potential industries and common facilities based on OCEMS data program". The major observations made by the inspection team are as follows:

1. The Unit is involved in production of Sugar with consented capacity of 9000 T/M (tonnes/month). The Unit is also consented to produce by-products such as

‘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

Bagasse, Molasses and Filter Cake with capacity of 27000, 3500 and 2700 T/M, respectively.

2. The Unit was granted Consent to Operate (CTO) under the Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution) Act, 1981 by TNPCB, with validity up to 31.03.2024 and the validity of the Authorization is up to 31.03.2028.
3. The Unit was non-operational on the day of inspection due to temporary maintenance activity.
4. The source of freshwater consumption is from River Malatar. As per the records the average water consumption is 52 lit/Ton cane crushed.
5. During inspection, it was observed that, the ETP is not being operated properly and there was no proper trap/removal system in Oil & Grease tank. It was also reported that, seepage condition was noticed in the O&G tank, anaerobic & aerobic treatment system & effluent was found in black colour.
6. Algal bloom was observed in the clarifier & in the treated effluent storage tank.
7. Sludge Drying bed was found to be dry and no sludge accumulation confirms the non-operation of ETP.
8. The Unit does not maintain proper records for waste water generation, treatment and discharge.
9. The Unit has no boiler, the steam requirement is met through the Co-gen plant of M/s Chengalrayan Co-Generation Power Plant (18MW) next to the sugar Unit premises. The Co-gen plant has obtained separate CTO under Water & Air Act, so monitoring of this unit was not carried out.
10. The Unit does not maintain proper records for hazardous waste generation, Storage and disposal. No proper space provided for storing of waste.
11. The Unit has connected two flow-meters to the CPCB and TNPCB server, one at inlet of the ETP and another at Outlet of the ETP. No continuous flow data is observed in the server from December 2023 to Mid of March 2024.
12. It was reported that during inspection, no flow of effluent was observed into the analyzers and the sampling tank was found to be dry, but stagnation of water in tubes were noticed. The pH probe was placed in a mug filled with water. Even though, there is no continuous flow in the mug but continuous values were observed from analyzer and same was transferred to CPCB server. The values/reading may be due to stagnation of water in the tubes, which indicates the improper installation of analyzers.
13. The Unit has not installed Environmental Display board at the entrance Gate.
14. During inspection, it was observed that the Unit was bypassing effluent without treatment from west side of the Unit (near to the circulation water pond/old closed molasses pit) through storm water drain. This drain leads to the natural

Dir. section 18(1) (b) of the Water (Prevention & Control of Pollution) Act, 1974 & the Air (Prevention & Control of Pollution) Act.

drain and reaches to Kasthipattu Lake. The lake water is used for irrigation purposes in nearby agricultural farm.

15. In addition to discharge of untreated effluent, **stagnation was observed near the molasses storage tank to which the Unit informed that the stagnation was due to the seepage from old closed molasses pit. The seepage from closed pit is also getting mixed with the drain carrying untreated effluent. The seepage from closed molasses pit indicates that the pit was not cleaned properly before closing.**
16. Inspection team has collected the samples from following locations (i) Inlet of ETP (ii) treated effluent collection tank (iii) Stagnation water near molasses closed pit (iv) Drain near to the lake. The samples were analyzed at TNPCB laboratory. The analysis report of the samples are as follows.

(1) The sample taken from **Stagnation water near molasses tank** indicates **BOD of 9600 mg/L, COD of 20000 mg/L and TDS of 12366 mg/L**, which confirms the seepage of untreated effluent from the closed molasses pit.

(2) The analysis report of the sample taken from the drain leading to the public pond indicates **BOD of 2100 mg/L, COD of 4800 mg/L and TDS of 2428 mg/L**, which confirms the discharge/bypass of untreated effluent.

WHEREAS, it is observed that TNPCB has issued consent to the Unit along with additional conditions, namely, compliance of CPCB direction for handling of Molasses & storage of Molasses only in steel tanks, no stagnation of effluent inside & outside the Unit and emptying the upper pool where molasses mixed with rain water nearby Molasses tank no.4 within 15 days; and

WHEREAS, it is evident from the above observation of the inspection team that the Unit is non-complying w.r.t. improper handling & storage of Molasses, stagnation of water near molasses tank & seepage from closed molasses pit and its mixing with drain, non-installation of display board, non-maintenance of logbooks, improper positioning of OCEMS analyzers etc.; and

NOW, therefore, in exercise of the powers conferred under Section 18(1) (b) of the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention & Control of Pollution) Act, 1981; Tamil Nadu Pollution Control Board (TNPCB) is **hereby directed to take appropriate action against the Unit** [M/s Chengalrayan Co-op.Sugar Mills Ltd, Periyasevalai (PO), Ulunderpet (Tk), Kallakurichi District] for discharge of untreated effluent & violating the consent conditions and ensure that the said Sugar Unit does not operate the manufacturing operation till it complies with the following:

1. The Unit shall not bypass/discharge untreated effluent through storm water drain to the lake and ensure that all effluent generated in the Unit are treated in ETP.
2. The Unit shall remove and scientifically disposed of the stagnated water near the molasses storage along with the residues remaining in the closed molasses pit and shall ensure that there should not be any seepage from old closed molasses pit

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into the drain. The action taken report shall be submitted to SPCB and SPCB shall verify the same before issuance of Consent order.

3. The Unit shall ensure that molasses generated by the Unit is not be leaked /discharged into surface water bodies/ground and shall be stored in proper tank meant for the purpose with all the proper precautionary measures.
4. The Unit shall augment/upgrade the ETP and ensure continuous operation of ETP.
5. The Unit shall use all its treated effluent for irrigation within the premises as per consented condition.
6. The Unit shall install separate energy meter for operation of ETP and maintain its logbook daily.
7. The Unit shall maintain proper records of effluent generation, treatment and discharge.
8. The Unit shall install the analysers properly and shall ensure continuous flow of treated effluent into the analysers to transfer authentic data through OCEMS. The Unit shall inform CPCB / TNPCB whenever the plant is taken for maintenance/shut down.
9. The Unit shall ensure uninterrupted connectivity of data transfer from OCEMS devices to CPCB and TNPCB server.
10. The Unit shall maintain proper records for hazardous waste w.r.t. generation, storage, disposal and also designate the specific storage area for storage of hazardous waste.
11. The Unit shall install Environmental display board at entry gate.

The action taken report shall be sent by TNPCB to the CPCB within 30 days from the date of receipt of these directions. TNPCB shall also acknowledge the receipt of this direction to CPCB within 15 days from the date of the receipt and should keep strict follow-up of the Unit during non-crushing season to ensure complete compliance of the direction.


(BHARAT KUMAR SHARMA)
MEMBER SECRETARY

Copy to:

- 1 **The Chairman** :For information please
Tamil Nadu Pollution Control Board,
76, Mount Salai,
Guindy, Chennai - 600 032
- 2 **The Regional Director,** :For information and follow-up please.
Regional Directorate, CHENNAI
Central Pollution Control Board
Second Floor, No.77-A, South Avenue Road,
Ambattur Industrial Estate, Ambattur Taluk,

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Thiruvallur District, Chennai, Tamil Nadu -
600 058

3 **The Director (CP Division),** :For information please.
Ministry of Environment, Forests& CC,
Prithvi Block, Indira Paryavaran Bhawan,
Jorbagh Road, New Delhi - 110 003

4 ✓ The Div. Head, IT Division, CPCB Delhi :To upload direction at CPCB Website,
please.

5. The Div. Head, IPC-VI Division, CPCB Delhi : For information please.



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Act, 1974 & the Air (Prevention & Control of Pollution) Act.**

