



SPEED POST

PJ-14099/21/2023-WQM-II-HO-CPCB-HO 2658

July 01, 2024

To,

**The Member Secretary,**  
Uttar Pradesh Pollution Control Board,  
Building No. TC-12V, Vibhuthi Khand,  
Gomti Nagar, Lucknow – 226 010  
Uttar Pradesh

**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 L H Sugar Factories Ltd (Distillery Division), Village-Jangrauli Pul, Pilibhit, Uttar Pradesh**

**WHEREAS**, under section 16 of the Water (Prevention & Control of Pollution) Act, 1974 and under Section 16 of the Air (Prevention & Control of Pollution) Act, 1981, one of the functions of the Central Pollution Control Board (CPCB), constituted under Water (Prevention & Control of Pollution) Act, 1974 is to coordinate activities of the State Pollution Control Boards and Pollution Control Committees and to provide technical assistance and guidance to SPCBs/PCCs; and

**WHEREAS**, the Central Government has notified the standards for discharge of environmental pollution from various categories of industries under the Environment (Protection) Act, 1986 and the Rule framed there under; and

**WHEREAS**, the CPCB and SPCBs have been pursuing the polluting industries to install effluent treatment plants (ETPs) to comply with the effluent discharge standards as notified under the Environment (Protection) Act, 1986 and the Rules framed there under; and

**WHEREAS**, the SPCBs/PCCs can stipulate stringent standards for discharge of environmental pollution from various categories of industries than those notified by the Central Government, under the Environment (Protection) Act, 1986 and Rules framed there under; and

**WHEREAS**, joint inspection of M/s L H Sugar Factories Ltd (Distillery Division), Village Jangrauli Pul, District- Pilibhit, UP (the Unit) was carried out by the joint team of CPCB and UPPCB on 09.01.2024 & 10.01.2024 for compliance verification. On the basis of observations of the joint inspection team, the Unit was asked vide letter dated 13.02.2024 to ensure the compliance of the following:

1. The Unit shall utilize spent wash stored in lagoon through MEE to achieve 40-45% solid concentration and the concentrated spent wash be used in slop fired incineration boiler under the supervision of UPPCB.
2. The Unit shall restrict its lagoon capacity to storage of 07 days equivalent of conc. Spent wash generated and only concentrated spent wash with more than 40-45% solid concentration shall be stored in lagoon for use in

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- incineration. Excess lagoon capacity shall be filled/dismantled/levelled within a month under the supervision of UPPCB.
3. The Unit shall immediately take corrective measures to stop the water logging problem near staff quarter and seepage of industrial water to adjacent agricultural field and repair the boundary wall.
  4. The Unit shall install mass flow meter with totalizer at MEE feed (inlet) & MEE concentrate instead of instantaneous mass flow-meter and shall maintain the logbook as per totalizer reading.

**WHEREAS**, a joint inspection of the said Unit was conducted by the team of CPCB and UPPCB on 12.03.2024 to verify the environmental compliance status including compliance of ZLD condition by the Unit. The major observations made by the joint inspection team are as follows:

1. UPPCB has issued Consolidated Consent to Operate and Authorization (CCA) to the Unit which is valid up to 31.12.2025.
2. The Unit has consented production capacity of 200 KLD for RS/ENA/Absolute Alcohol from B-Heavy molasses /Sugar Syrup OR 160 KLD for RS/ENA/Absolute Alcohol from C-Heavy molasses/Grains.
3. During visit, 60 KLD plant was found operational and engaged in production of Ethanol & ENA along with Co-power generation plant of 7MW.
4. During inspection, 60 KLD plant (molasses based) was operational and 100 KLD plant was non-operational.
5. The Unit has not installed STP within the industrial /residential premises.
6. As per the logbook record of the Unit, the Unit's freshwater withdrawal is 743.80 KLD.
7. The Unit has provided monkey ladder instead of easy ladder (spiral /scaffold type) ladder for emission monitoring as per CPCB Emission Regulations Part-III.
8. For the spent wash management, the Unit has 02 MEE and two incineration boiler of 23 TPH and 36 TPH. The Unit has installed CPU for the treatment of MEE condensate, spent leese & water from cooling tower blow down.
9. As per consented conditions, Unit has to treat the effluent and treated effluent should be recycled to maximum extent and should be reused within the premises for gardening etc. The Unit has not been allowed for discharge of any treated effluent outside the preemies.
10. During the visit, spillage of effluent was observed at MEE plant area.
11. The Unit has a two lagoons /tanks of approx. 5486 m<sup>3</sup> total capacity [Lagoon 1 is of 805 m<sup>3</sup> and second lagoon (capacity 4681 m<sup>3</sup>) is divided equally in two parts i.e. lagoon 2&3 of capacity 2341 m<sup>3</sup> each]. The Unit is storing spent-wash in two lagoons (Lagoon 1 & 2 only) and lagoon 3 is storing washing/floor cleaning water (as informed by Unit). The storage capacity of raw spent-wash is 3146 m<sup>3</sup> [Lagoon1 + lagoon 2 = 805 m<sup>3</sup> + 2341 m<sup>3</sup>=3146 m<sup>3</sup>].
12. The Unit has installed Condensate Polishing Unit (CPU) and was found operational. During the visit, samples were collected from the CPU Inlet, Aeration tank, After tertiary treatment and RO outlet.
13. Analysis result of sample collected from the outlet of CPU i.e. RO Permeate shows pH-8.30, COD – 104 mg/l, BOD – 31 mg/l, TSS-BDL mg/l and Total Dissolved Solid – 920 mg/l. The MLSS and MLVSS value in the aeration tank was observed as 1177 mg/l and 734 mg/l respectively. The MLSS and MLVSS value is low in the Aeration tank.

14. The Ash generated from incineration boiler was lying open & uncovered near ETP/CPU Unit. The Unit should store the Ash under covered shed so as to prevent any fugitive emission.
15. During inspection, effluent was observed in storm water Drain (located inside the boundary wall of the Unit) and storm water drain finally meets collection tank/pit (installed in residential colony/staff quarter). The storm water drain (within the Unit) was having effluent in stagnant condition and its lab analysis result shows pH-7.6, colour-300 Hazen, COD-1319 mg/l, BOD - 521 mg/l, TSS-16 mg/l and TDS-392 mg/l.
16. During the visit, the Unit representative informed that the storm water is collected in the pit/collection tank which is further discharged outside the factory in the nearby drain through underground pipeline/channel via gravity.
17. As per the CTO, process effluent / any wastewater shall not be allowed to mix with storm water drain. However, during the visit effluent with high BOD (521 mg/l) and COD (1319 mg/l) was found in the storm water drain which onwards reaches to collection pit/tank located at staff quarter and the effluent from the collection pit onwards flows via gravity to outside drain and finally reach to Pond located in village Jiraunia.
18. The inspection team collected sample of water from the Pond located outside the Unit premises. The lab analysis result of water sample collected from the Pond shows pH-8.2, BOD-114mg/l, COD-374 mg/l, TDS-2188 mg/l and Colour-308 Hazen.
19. During inspection, water logging (mild colored effluent) condition was observed inside the residential colony/staff quarter area. The team collected effluent sample from the water logged area and the analysis result shows pH-8.4, colour-280 Hazen, COD-458 mg/l, BOD-174 mg/l, TSS-50 mg/l and TDS-2120 mg/l indicating discharge of partially treated industrial wastewater in the open land area at residential colony/staff quarter.
20. The Unit has repaired the wall to prevent seepage of wastewater to adjacent agricultural field as observed in the last inspection. However, the effluent /water logging condition (at staff quarter) is still prevailing as observed in the last inspection as well.
21. The analysis result of sample collected from the village Pond indicates that pond water is mixed with industrial wastewater as there is no other source of such high TDS concentration. The higher BOD, COD along with high concentration of TDS revealed that the Unit discharges its partially treated industrial effluent into the drain which reaches the Pond located in the village Jiraunia Samar Gautiy.

**WHEREAS**, it was evident from the above observations made by the inspection team, that the Unit was found non-complying w.r.t. ZLD condition due to discharge of wastewater in open land (near staff quarter) and having underground channel/conveyance system from Unit to outside drain/Singhanianallah. The water quality of the samples collected from water logged area/land (BOD-174mg/l, COD-458mg/l, TDS-2120mg/l), storm water drain (BOD-521mg/l, COD-1319mg/l) and from Pond (BOD-114 mg/l; COD-374 mg/l, TDS-2188 mg/l) indicates that the Unit intermittently discharges its partially treated effluent into storm water drain, open land (near staff quarter) & collection pit/tank which onward reaches the outside drain/Singhanianallah and finally reaches to Pond (located in village Jiraunia Samar Gautiy). The Unit has also not installed STP violating the consent conditions; and

**NOW, therefore**, in exercise of the powers conferred under Section 18(1) (b) of the Water (Prevention and Control of Pollution) Act, 1974; **the Uttar Pradesh**

**Pollution Control Board (UPPCB) is hereby directed to take appropriate action against the Unit** [M/s L H Sugar Factories Ltd. (Distillery), Village-Jangrauli Pul, Pilibhit, UP] for violation of consent conditions and ensure compliance of the following in a time bound manner:

1. The Unit shall not discharge its partially treated effluent into the storm water drain & in open land (at residential /staff colony) and shall treat the entire effluent in the CPU and shall strictly follow the consent condition for ZLD.
2. Existence of the underground channel for conveyance of storm water from the collection pit within unit premises to the outside drain i.e. Singhania Nallah, be examined and necessary actions be taken including dismantling of the underground channel, as appropriate, to ensure consent condition of Zero Liquid Discharge.
3. The Unit shall ensure that no wastewater is discharge into the storm water drain/open land and outside the Unit premises.
4. The Unit shall submit a time bound action plan for the restoration of Pond located at Jirauniya Smar Gautiy village and the same shall be examined and evaluated by UPPCB. Thereafter, UPPCB shall issue appropriate direction for its time bound execution by the Unit.
5. The Unit shall install Sewage Treatment Plant (STP) for treating their domestic wastewater in compliance of the consent condition.
6. The Unit shall enhance the performance of RO system so as to meet the designed water quality norms and to reuse & recycle the treated effluent as cooling tower makeup water.
7. The Unit shall ensure no effluent spillage at MEE plant area and shall take all corrective measures in this regard.
8. The Unit shall treat the washing/floor cleaning wastewater stored in Lagoon-3 and necessary records such as waste water stored in Lagoon-3, quantity treated, method of treatment and use of treated water, be maintained.
9. The Unit shall regularly update the information on data display board installed at the entrance Gate.
10. The Unit shall provide easy ladder (spiral /scaffold type) ladder at stacks instead of monkey ladder to ensure safe access to sampling port for emission monitoring as per CPCB Emission Regulations Part-III.
11. The Unit shall store the boiler Ash under covered shed so as to prevent any fugitive emission.

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



**(BHARAT KUMAR SHARMA)**  
**MEMBER SECRETARY**

Copy to:

1. **The Chairman,**

Uttar Pradesh Pollution Control Board  
Building No. TC-12V, Vibhuthi Khand,  
Gomti Nagar, Lucknow – 226 020

: For information please.



2. **The Director, (CP Division),**  
Ministry of Environment, Forests & CC,  
Prithvi Block, Indira Paryavaran Bhawan,  
Jorbagh Road, New Delhi – 110 003 : For information please.
3. **The Regional Director,**  
CPCB Regional Directorate, Lucknow  
PICUP Bhawan, Ground Floor,  
Vibhuti Khand, Gomti Nagar,  
Lucknow-226010 : For information & follow up  
please.
4. The Div. Head, IT Division, CPCB Delhi : For uploading in CPCB website  
please.
5. The Div. Head, IPC-III Division, CPCB Delhi : For record and necessary action  
please.
6. The Div. Head, WQM-II Division, CPCB Delhi : For record and necessary action  
please.

  
(BHARAT KUMAR SHARMA)  
MEMBER SECRETARY