



केन्द्रीय प्रदूषण नियंत्रण बोर्ड  
CENTRAL POLLUTION CONTROL BOARD  
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय, भारत सरकार  
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE, GOVT. OF INDIA

Speed Post

CP-11/24/2024-IPC-III-HO-CPCB-HO

August\_, 2024

To,

The Member Secretary,  
Haryana State Pollution Control Board,  
C-11, Sector 6, Panchkula,  
Haryana- 134109

**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 The Palwal Co-Operative Sugar Mills Limited, District Palwal, Haryana-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**, 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**, the inspection of M/s The Palwal Co-Operative Sugar Mills Ltd. (Sugar Mill), District Palwal, Haryana (*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 real-time online continuous effluent monitoring system (OCEMS) data programme". The major observations made by the inspection team are as follows:

1. The Unit was engaged in production of Sugar using sugarcane as raw material with installed capacity of 2200 TCD (Tonnes crushing per day) and operating on full capacity on the day of inspection.

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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 HSPCB, with validity up to 30.09.2024.
3. The Unit has installed 02 Tubewells for industrial and domestic purpose. The Unit has neither obtained NOC from the concerned Groundwater Authority for extraction of groundwater nor installed water meters at tube wells.
4. The Unit has installed an Effluent Treatment plant (ETP) based on Activated Sludge Process (ASP).
5. The Unit has not provided proper mixing arrangement in the collection Tank of ETP and it is observed that the tank is filled with sludge.
6. The Unit has not installed proper chemical dosing system for the ETP. At the time of visit, unscientifically chemical dosing was observed at Neutralization Tank of ETP.
7. The Unit has installed energy meter for ETP but records of the same was not maintained.
8. The Unit has not provided bar screen system and Oil & Grease trap at inlet of ETP for removal of floating material and Oil & Grease respectively.
9. At the time of visit, 01 out of 03 surface aerator were found out of order.
10. The team collected sample from the ETP and as per the lab analysis results, the Unit is complying with all the discharge standards except BOD which was found to be 69 mg/l (against 30 mg/l). The MLSS and MLVSS concentration was very low (MLSS and MLVSS was 226 mg/l and 156 mg/l respectively) indicating poor operation & maintenance of the ETP.
11. During inspection, it was observed that the RO reject water, boiler blow down, scrubbing water, spray pond overflow is sent in the lagoon without prior treatment.
12. The Unit has six (06) storage lagoons (02 lined and 04 unlined lagoons) for storing treated water up to 15 days in case of low demand period for irrigation.
13. The Unit has not provided proper stack emission monitoring facilities (Platform, Ladder) as per CPCB Emission Regulation (Part-3).
14. The Unit has not obtained Authorization under the Hazardous and other Wastes (Management and Transboundary Movement) Rules, 2016.
15. As per the specific condition at Sr. No 17 of the consent to operate (CTO), it is stipulated that "Unit will not discharge any type of effluent outside of the premises of the project and reuse/recycle the treated wastewater". However, it was observed that the Unit is using the treated effluent for irrigation in its own land.

**WHEREAS**, it is evident from the above observations that the Unit is non-complying with respect to consented standards (as BOD was 69 mg/l against norms of 30 mg/l), no Authorization under Hazardous & other Wastes, Rules, 2016, no NOC/permission from the groundwater department for extraction of groundwater and poor operation & maintenance of ETP. The Unit representative informed that the ETP treated effluent is

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discharged into the adjacent own land for irrigation purpose. However, the CTO issued by SPCB has not mentioned about the use of treated effluent for irrigation purpose; and

**WHEREAS**, the Ministry of Environment, Forest, & Climate Change, Govt. of India, vide notification S.O.157(E) of 27.02.1996 has delegated powers vested under Section 5 of the Environment (Protection) Act, 1986 (29 of 1986) to the Chairman, Central Pollution Control Board (CPCB), to issue direction to any industry, Municipal Corporation, Municipal Council, Cantonment Board, to any local or other Authority for the violation of emission and effluent standards notified under the Environment (Protection) Rules, 1986 and other standards and norms; 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; the **Haryana State Pollution Control Board (HSPCB) is hereby directed to immediately take appropriate action against the Unit** [M/s The Palwal Co-operative Sugar Mills Ltd., District Palwal]:

1. To ensure that the Unit is operated only with valid Authorization granted under the Hazardous & other Waste Rules, 2016 and obtains CGWA permission for groundwater abstraction and meets the consent conditions of consent to operate (CTO) including upgradation/proper operation of ETP and complete compliance with discharge standards.
2. Water consumption, cane crushing capacity, wastewater discharge quantity and mode of use/disposal be re-assessed. Necessary conditions in this regard be stipulated in the CTO. In case of irrigation, SPCB shall seek irrigation management plan (IMP) from the Unit as per the CPCB guidelines for "Utilization of treated effluent for irrigation" and accordingly stipulate the applicable conditions with standards in the CTO.
3. To ensure compliance of the following by the said Unit [M/s The Palwal Co-Operative Sugar Mills Ltd., District Palwal]:
  - i. The Unit shall dismantle/level all the 04 unlined Lagoons existing within the premises for storing treated effluent for low demand period and storage of treated effluent in unlined Lagoon shall not be allowed by HSPCB.
  - ii. The Unit shall carryout the groundwater monitoring in and around the command area (for irrigation) and near unlined Lagoon and submit the analysis report from the NABL/EPA recognized/accredited laboratories to HSPCB and CPCB.
  - iii. The Unit shall obtain the NOC for groundwater abstraction and use from the concerned Groundwater Authority.
  - iv. The Unit shall install water-meter at all the water abstraction points/Borewells and shall maintain the logbook record for the same.
  - v. The Unit shall install Bar Screen system and Oil & Grease trap at the inlet of the ETP for removing the floating material and Oil & Grease respectively.
  - vi. The Unit shall ensure treatment of RO reject water, boiler blow down, scrubbing water, spray pond overflow before its disposal.

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- vii. The Unit shall install mixing arrangement in the collection tank and proper chemical dosing system at the ETP.
- viii. The Unit shall install diffused aeration system in the aeration tank in place of surface aerators.
- ix. The Unit shall install tertiary treatment system at the ETP.
- x. The Unit shall maintain logbook record of the energy meter installed for the ETP.
- xi. The Unit shall provide proper stack emission monitoring facilities (Platform, Ladder) as per CPCB Emission Regulation (Part-III).
- xii. The Unit shall improve the overall housekeeping of the plant.

The action taken report shall be sent by HSPCB to the CPCB within 30 days from the date of receipt of these directions. HSPCB 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** : For information please  
Haryana State Pollution  
Control Board,  
C-11, Sector 6, Panchkula,  
Haryana- 134109
- 2 **The Regional Director,** : For information and follow-up please.  
Regional Directorate,  
Chandigarh  
Central Pollution Control  
Board  
BSNL Telephone Exchange,  
2nd Floor, Sector -49 C,  
Chandigarh - 160047
- 3 **The Director (CP Division),** : For information please.  
Ministry of Environment,  
Forest & Climate Change,  
Prithvi Block, Indira  
Paryavaran Bhawan, Jorbagh  
Road, New Delhi - 110 003
- 4 ✓ The Divisional Head, IT , CPCB : To upload direction at CPCB Website,  
Delhi please.
- 5 The Divisional Head, IPC-VI, : For information please.  
CPCB Delhi

  
(BHARAT KUMAR SHARMA)  
MEMBER SECRETARY

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