



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

CPCB/IPC-VII/CETP-M/s Talco Dindigul/ 5025

Date: 18.09.2024

To

The Member Secretary

Tamil Nadu Pollution Control Board

No. 76, Mount Salai, Guindy,

Chennai – 600032

(Tamil Nadu)

Subject: Directions under section 18(1)(b) of the Water (Prevention and Control of Pollution) Act, 1974, regarding non-compliance status of CETP- M/s. TALCO Dindigul Tanners Enviro Control Systems Pvt Ltd, Dindigul, Tamil Nadu.

WHEREAS, amongst others, under Section 17 of the Water (Prevention & Control of Pollution) Act, 1974, one of the functions of the State Pollution Control Board (SPCB), (or Pollution Control Committee for Union Territories) is to plan a comprehensive programme for prevention, control or abatement of pollution of streams, wells and air pollution in the State/Union territory and to secure the execution therefore; and

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

WHEREAS, amongst others, under Section 16 of the Water (Prevention & Control of Pollution) Act, 1974, one of the functions of the Central Pollution Control Board (CPCB), is to promote cleanliness of streams and wells in different areas of the State; and

WHEREAS, the Central Government has notified the standards for discharge/emissions of environmental pollutants from various categories of industries, Common Effluent Treatment Plants (CETPs) and Sewage Treatment Plants (STPs) under the Environment (Protection) Act, 1986 and the rules framed there under; and

WHEREAS, there is a need to inculcate the habit of self-monitoring within the CETPs for complying with the prescribed standards and this can be achieved by installing Online Continuous Effluent Monitoring System (OCEMS); and

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WHEREAS, CETP- M/s. TALCO Dindigul Tanners Enviro Control Systems Pvt Ltd, S.F.No. 562 & 606, Pallapatty village, Dindigul west Taluk and Dindigul District, Tamil Nadu (herein after referred as CETP) was inspected by the team of CPCB, RD Chennai on 06.06.2024 and the following major observations were made:

- I. The CETP has a capacity of 2500 KLD for the treatment of effluent generated from 49 tannery member units. As per the records, the average quantity of effluent received in CETP is around 500-700 KLD. During the inspection, the CETP was found operational except Multi Effect Evaporator (MEE) and Agitated Thin Film Dryer (ATFD). It was informed that the MEE and ATFD unit were under maintenance.
- II. The CETP has obtained Consent to Operate (CTO) for collection, conveyance, treatment and disposal of total quantity 2533 KLD from TNPCB which was valid up to 31.03.2024. The CETP has applied for renewal of CTO to TNPCB. Hazardous Waste authorization is valid up to 24.10.2024. Discrepancy was observed between the consented capacity (2,533 KLD) and designed capacity (2,000 KLD) of the CETP.
- III. Industrial effluent from member industries is brought through pipeline to the CETP. The CETP comprises of pre settler tank, equalization tank, flocculation tank, primary clarifier, UASB tank, aeration tank, Secondary clarifier, neutralization tank, reactor clarifier, DMF tank, Microfiltration unit, Ultrafiltration unit, Reverse Osmosis (RO), Multi Effect Evaporator (MEE), Agitated Thin Film Dryer (ATFD), sludge thickener/filter press and sludge drying bed (SDB).
- IV. As per the consent, "The CETP shall operate and maintain the ZLD system consisting of 4 stages RO, MEE and ATFD to treat 2443 KLD of trade effluent out of total quantity of 2533 KLD". Further it was mentioned that 90 KLD of treated trade effluent is diluted with 450 KLD of treated sewage of DGL municipal corporation and total 540 KLD of diluted effluent shall be utilized for social forestry and green belt development of adequate area after meeting the standards prescribed by the Board, adopting a hydraulic loading rate of 35 KL/Hec/Day. Discrepancy in total quantity to be treated and disposal pathway was observed.
- V. The CETP shall not discharge diluted effluent into Sengulam under any circumstances and shall furnish action plan to convert Sengulam into normal land for greenery development. The CETP has provided flowmeter at the outlet to Sengulam. It was informed that the CETP is not discharging any trade effluent to Sengulam and no flow was recorded with RTDMS portal.
- VI. CETP has also installed flowmeters at different stages of operations. The Flow meters installed at Primary Clarifier feed, outlet to social forestry, and outlet to Sengulam are connected to CPCB server.
- VII. During inspection samples were collected at different stages of CETP. These samples were submitted and analyzed at laboratory of TNPCB, Dindigul. As per the analysis report, the treated effluent discharged after dilution is meeting the prescribed norms.
- VIII. During the visit, it was observed that untreated effluent from the primary settler is discharged through old SDB and overflow from the damaged portion leads to

accumulation of effluent on the open land. The effluent from the open land finds its way to the nearby natural drain leads to Mungilkulam pond, which is 1.5 Km away from the CETP. Samples of untreated effluent from the primary settler and the observed stagnated effluent were collected and analysis results reveals that the CETP is discharging the untreated effluent into open land without treatment.

- IX. The CETP has installed online effluent monitoring system (OCEMS) and connected to CPCB server for monitoring parameters TSS, TDS, pH, BOD and COD at the outlet to social forestry after dilution with treated STP effluent. However, the data connectivity for TSS, COD and BOD found disconnected since Jan 2024 to 24 March 2024. During inspection, OCEMS was not in operation and error display was observed in the analyzer.
- X. The CETP has informed that the salt recovered from the ATFD is being reused by the member units for preservation of hides. To verify the performance of the RO system and to ensure accuracy in the salt balance, an attempt to calculate salt generation rate was carried out. These calculations revealed discrepancies in the effluent balance and salt management, indicating unaccounted quantities of effluent and salt. This raises concerns regarding the accuracy of effluent tracking and reporting.
- XI. CETP generates chemical sludge and bio sludge from the effluent treatment. The CETP has three filter press, one is used for bio sludge and another two for chemical sludge. In addition, the CETP has 17 nos. of old Sludge Drying Bed (SDB). Sludge drying beds were found damaged and sludge from the old unused SDB was also not removed. The sludge generated is disposed through authorized preprocessor M/s Cheenu Enviro Management, Coimbatore for co-processing in cement industry as per the authorization. Covered storage shed is provided for chemical sludge and bio sludge. However, open dumping of chemical sludge was observed inside the premises. ETP/chemical sludge dumping and covering by soil and vegetation was also observed during inspection and it was informed that the bio sludge is being used as manure in social forestry. Use of bio-sludge as manure was not prescribed in the authorization.
- XII. The CETP has two old anaerobic lagoons that are no longer in use or operation, and during the inspection, old sludge deposition was observed, which has not yet been removed. Additionally, the old solar evaporation ponds were found damaged and are also not permitted to operate as per the consent.
- XIII. The discharge norms for pH, TSS, phenolic compounds, and hexavalent chromium specified in the TNPCB consent are relaxed than the discharge standards prescribed in Notification dated 01.01.2016. The details are given below:

S.No	Parameters	Standard as per TNPCB consent	Notified Standard dated 01.01.2026
1	pH	5.5 to 9	6 to 9
2	TSS (mg/l)	200	100
3	Phenolic Compound (mg/l)	5	1
4	Hexavalent Chromium (mg/l)	1	0.1

- XIV. TNPCB has not prescribed any standard for Inlet of CETP as per the notification dated 01.01.2016.
- XV. The housekeeping was observed poor in terms of leakages/overflow/spillages near pre settler tank, UASB tank and sludge drying bed.


AND, NOW, THEREFORE, in exercise of powers conferred under section 18(1)(b) of the Water (Prevention & Control of Pollution) Act, 1974, Tamil Nadu Pollution Control Board (TNPCB) is hereby directed to take appropriate action including imposing environment compensation, against the reported observations and to ensure compliance of the following from the CETP:

- a. Immediately stop discharging untreated effluent and open dumping of ETP sludge on land and covering with soil & vegetation. Presently, dumped sludge should be collected and disposed as per the authorization issued to the CETP by TNPCB.
- b. The CETP shall obtain valid consent to operate from TNPCB under Water (Prevention and Control of Pollution) Act, 1974 & the Air (Prevention and Control of Pollution) Act, 1981.
- c. To dismantle old Sludge Drying Beds, lagoons, and damaged solar evaporation ponds, and ensure the use of filter press for sludge thickening as per the condition prescribed in the consent.
- d. To maintain proper records/logbook for generation, storage and utilization of ATFD salt by the member units and also to ensure the storage & disposal of salt, which is being generated by the member units during dry/mechanical cleaning of hides before processing.
- e. To carry out detailed study for salt balance and effluent balance to identify gaps through a recognized institute and to implement the recommendation of the said study. The study shall also include utilization rate, method and mode of disposal, etc.
- f. To ensure connectivity of OCEMS to CPCB Server. In addition to carry out periodic calibration of flow meters and online effluent analyzers properly as per the guidelines so as to generate real time accurate and reliable data.
- g. To repair damaged infrastructure, treat and remove accumulated effluent from the land.

- h. To conduct detailed study of the Mungilkulam pond to assess level of pollution/contamination and to prepare action plan for the restoration of water quality in the said pond.
- i. Not to dispose bio-sludge to Social Forestry as manure without authorization from TNPCB.

Further, TNPCB is also directed to specify the required inlet norms for CETP and revise discharge norms for parameters pH, TSS, phenolic compounds, and hexavalent chromium as per the CETP notification dated 01.01.2016. Requirement of pipeline from CETP to Sengulam may be examined as discharge is not permitted to Sengulam.

The action taken by TNPCB be intimated to CPCB within 15 days of receipt of these directions.


Bharat Kumar Sharma
Member Secretary

Copy to:

1. **The Chairman** : for information, please.
Tamil Nadu State Pollution Control
Board
76, Mount Salai, Guindy,
Chennai-600032 (Tamil Nadu)
2. **The Additional Secretary (CP
Division)** : for information, please.
Ministry of Environment, Forests &
Climate Change,
Prithvi Wing, 2nd Floor, Indira
Paryavaran Bhawan, Jor Bagh Road,
New Delhi-110 003.
3. **The Regional Director,** : for follow-up, please.
Central Pollution Control Board,
2nd Floor, 77-A South Avenue Road,
Ambattur Industrial Estate,

Ambattur Taluk, Thiruvallur
Chennai-600058 (Tamil Nadu)

4. **Divisional Head, WQM-I,** : for information, please.
CPCB, Delhi
5. **Divisional Head, IPC- VI,** : for information, please.
CPCB, Delhi
6. **Divisional Head, IT** : for uploading on CPCB
CPCB, Delhi website, please.


(Bharat Kumar Sharma)

