



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

PI-20/6/2024-IPC-III-HO-CPCB-HO 5414

October 4, 2024

To,

The Member Secretary,
Madhya Pradesh Pollution Control Board,
Paryawaran Parisar, E-5, Arera Colony,
Bhopal - 462 016,
Madhya Pradesh

Directions under section 18(1) (b) of the Water (Prevention & Control of Pollution) Act, 1974 & the Air (Prevention & Control of Pollution) Act, 1981

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, a team of officials from Central Pollution Control Board (CPCB) inspected two distilleries, namely, **M/s Agrawal Distilleries Pvt Ltd.**, Gram Khodi Barwaha, Tehsil Badwah, Dist-Khargone and **M/s Associated Alcohol & Breweries Ltd.**, 15, Katkut road SabalPura, Badwah, Dist-Khargone (M.P)

‘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

(hereinafter referred as 'the Units') during August 10-11, 2024 with reference to letter dated 23/7/2024 from Shri Gyaneswar Patil, Hon'ble MP, Lok Sabha, regarding environmental pollution caused by M/s Agrawal Distilleries Pvt. Ltd & M/s Associated Alcohol & Breweries Ltd. operating in Khargone District, Madhya Pradesh. The major observations and non-compliance made during the visit the team are as follows:

I. M/s Agrawal Distilleries Pvt. Ltd. Badwah:

1. The Unit is a grain based Distillery and involved in Manufacturing of rectified spirit (RS)/extra neutral alcohol (ENA) having consented capacity of 40 KLD or 32200 KL per year.
2. The Unit has produced 14298 KL of RS/ENA in one year (from Aug, 2023 to July, 2024) against consented capacity of 13200 KL per Annum.
3. The team collected the effluent samples from the inlet & outlet of ETP and RO permeate. The lab analysis report of outlet of ETP shows pH-7.33, BOD-12 mg/l, COD-35 mg/l, TSS-20 mg/l and RO permeate water shows pH-6.81, BOD-06 mg/l, COD-18 mg/l, TSS-02 mg/l and treated water is reused/recycled.
4. The team also collected Groundwater samples and lab analysis report indicates that all the analysed parameters are within the stipulated standards/desirable limits as per IS 10500:2012.
5. The stack monitoring of 20 TPH boiler was carried out and the observed values are Particulate matter (PM) -27 mg/Nm³ (against 50 mg/Nm³), SO₂-180 mg/Nm³ (against 600 mg/Nm³) and NO_x-260 mg/Nm³ (against 300 mg/Nm³).
6. The Unit has not installed Sewage Treatment Plant (STP) as per consent condition.
7. The Ash generated from boiler is sold to local brick manufacturers or used in filling in low lying area.
8. The housekeeping at coal shed area requires to be improved to control fugitive emission.

II. M/s Associated Alcohol & Breweries Ltd., Badwah:

1. The Unit is a grain based Distillery & involved in Manufacturing of rectified spirit-165 KLD, Fuel Ethanol 200 KLD.
2. The team collected the effluent samples from the inlet & outlet of ETP and RO permeate. The lab analysis report of outlet of ETP shows pH-8.26, BOD-10 mg/l, COD-28 mg/l, TSS-08 mg/l and RO permeate water shows pH-7.97, BOD-04 mg/l, COD-16 mg/l, TSS-04 mg/l and treated water is reused/recycled.
3. The team also collected the Groundwater samples and lab analysis report indicates that all the analyzed parameters are within the stipulated standards/desirable limits as per IS 10500:2012.

4. The stack monitoring of 55 TPH boiler was carried out and the observed values are PM-23 mg/Nm³ (against 50 mg/Nm³), SO₂-220 mg/Nm³ (against 600 mg/Nm³) and **NOx-310 mg/Nm³** (against 300 mg/Nm³).
5. The Unit has newly commissioned 90 KLD and 60 KLD sewage treatment plant (STP), however, as per consent condition of CTO (consent to operate) the max. sewage allowed from the Unit is 12.20 KLD.
6. The Unit has provided pug mill arrangement with chutes at unloading point of the fly ash and it was found functional during visit, however fly-ash spillage/fugitive emission near the truck loading area was observed.
7. Presently the Unit has stored the coal openly near the boiler area, however coal shed for storage of coal is under progress.

WHEREAS, the inspection team also conducted river water quality monitoring and collected water samples to assess the water quality of river Narmada, Choral and Padli in Badwah region. The analysis result indicates that none of the monitored parameters are showing abnormal values. However, due to excessive rain during monitoring, very less variation was observed in the water quality of all the monitored river as rivers were flowing near to flood level and most of the point & no-point sources were submerged. A STP based on SBR technology near Choral river at Khasra no. 239 is under construction which has to be completed at the earliest as in the absence of its completion the untreated sewage of city is being mix directly in Choral river which is tributary of Narmada; and

WHEREAS, it was evident from the above observations that the M/s Agrawal Distilleries Pvt. Ltd. Badwah (Distillery Unit) is violating the consent condition w.r.t production of alcohol more than the consented capacity, non-installation of sewage treatment plant (STP) and M/s Associated Alcohol & Breweries Ltd. (Distillery Unit) is non-complying w.r.t NOX emission parameters; 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 Air (Prevention and Control of Pollution) Act, 1981; the Madhya Pradesh Pollution Control Board (MPPCB) is hereby directed:

1. To take appropriate action against the **M/s Agrawal Distilleries Pvt. Ltd.**, Badwah, District Khargone for violating the consent conditions i.e. exceeding the production capacity & non-installation of STP and shall ensure compliance of the following:
 - i. The Unit shall not produce the RS/ENA more than the consented production capacity of MPPCB.
 - ii. The Units shall install and commission the Sewage Treatment Plant (STP) as per the consent conditions.

Dir. section 18(1) (b) of the Water (Prevention & Control of Pollution) Act, 1974 & the Air (Prevention & Control of Pollution) Act, 1981.

- iii. The Unit shall maintain Zero Liquid Discharge as per consent condition.
 - iv. The Unit shall dispose off the Ash as per the prescribed consent conditions.
2. To ensure compliance of the following by **M/s Associated Alcohol & Breweries Ltd.**, Badwah, Khargone District:
- i. The Unit shall optimize/upgrade the performance of air pollution control device and ensure continuous compliance of the prescribed emission standard and submit the stack monitoring result from EPA recognized lab to SPCB.
 - ii. The Unit shall ensure that the daily quantity of the sewage shall not exceed the consented quantity. In case, the quantity is more than the consented quantity the same shall be reviewed and further appropriate action be taken by SPCB in this regard.
 - iii. The Units shall ensure Zero Liquid Discharge as per consent condition.
 - iv. The Units shall take necessary measures to stop fugitive emission near the truck loading area and ensure proper housekeeping & ash management in their premises.
 - v. The Unit shall expedite the construction of coal shed for storage of coal and shall not store the coal in open area.
3. MPPCB may keep constant vigil over the said Units and ensure continuous compliance of all the consent conditions.
4. To co-ordinate with the concerned department ensuring that the STP near Choral river at Khasra no. 239, which is under construction, be completed at the earliest.

The action taken report shall be sent by MPPCB to the CPCB within 30 days from the date of receipt of these directions. MPPCB 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,
Madhya Pradesh Pollution Control Board,
Paryawaran Parisar, E-5, Arera Colony,
Bhopal - 462 016, Madhya Pradesh

: For information please.

Dir. section 18(1) (b) of the Water (Prevention & Control of Pollution) Act, 1974 & the Air (Prevention & Control of Pollution) Act, 1981.

2. The Director, (CP Division), : For information please.
Ministry of Environment, Forests & CC,
Prithvi Block, Indira Paryavaran Bhawan,
Jorbagh Road, New Delhi – 110 003
3. The Regional Director, : For information & follow up
CPCB Regional Directorate- Bhopal please.
Parivesh Bhawan, Paryavaran Parisar E-5,
Arera Colony, Bhopal-462016
4. The Divisional Head, IT Division, CPCB : For uploading in CPCB
Delhi website please.
The Divisional Head, IPC-III Division,
- 5 CPCB, Delhi : For information please.


(BHARAT KUMAR SHARMA)
MEMBER SECRETARY

