

**SPEED POST**

B-190198/NGRBA(RG)/CPCB/Distillery/9/2016-17

January 1<sup>st</sup>, 2018

To

**M/s Mohit Petro Chemical Pvt. Ltd.,  
9 K.M. Stone Nagina Road,  
District Bijnor-246701  
Uttar Pradesh**

**SHOW CAUSE NOTICE UNDER SECTION 5 OF THE ENVIRONMENT (PROTECTION) ACT, 1986**

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

**WHEREAS**, the Ministry of Environment & Forests, 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

**WHEREAS**, it is obligatory on the part of 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 also to meet the consent conditions granted by State Pollution Control Board (SPCBs) / Pollution Control Committees (PCCs); and

**WHEREAS**, M/s Mohit Petro Chemical U.P (hereinafter referred as 'the Unit') is involved in the manufacturing process of extra neutral alcohol and rectified spirit using molasses as raw material; and

**WHEREAS**, CPCB issued direction dated 29-06-16 under section 18(1)(b) of water Act, 1974 to UPPCB to take prescribed steps immediately to resolve the issue of discharge of coloured effluent in the choiyya drain; and

**WHEREAS**, UPPCB issued directions dated 02-09-2016 under section 33(A) of water Act, 1974, in compliance of CPCB directions dated 29/9/2016 to the unit for compliance of following direction:

1. M/s Mohit Petrochemicals Pvt. Ltd., 9 K.M., Nagina Road, Bijnor are directed to collectively take steps for removing the colour in the drain and also to remove the deposited sludge in the bottom bed of the drain for preventing leaching out of colour in future.

(Contd..2/-)

2. It shall be ensured that M/s Mohit Petrochemical Pvt. Ltd., 9 K.M., Nagina Road, Bijnor shall comply the consent conditions and that coloured effluent shall not be discharged into Choiyya drain at any point of time.
3. A written undertaking on affidavit in this regard shall be submitted by the industry in particular and in the event of observation of coloured effluent near the downstream of Choiyya drain, the industry shall be held solely responsible and closed down immediately without any notice.

**AND WHEREAS**, the unit was inspected by the officials of Central Pollution Control Board (CPCB), on 22.12.2016 for the verification of compliance by the unit and following observations were made:

1. As per the production detail, partial production was observed in the month of July and Sep 2016, which is against the protocol that bio-composting, should be closed during rainy season.
2. The unit has not taken effective steps for removing the colour from choiyya drain and to remove the deposited sludge in the bottom bed of the drain.

**AND WHEREAS**, CPCB issued direction dated 07.04.2017, under section 5 to comply with the following directions;

1. The Unit shall not operate during rainy season as per the prescribed protocol.
2. The unit shall submit action taken report for removing the colour in the choiyya drain and to remove the deposited sludge in the bottom bed of the drain within 15 days after receipt of the direction.
3. The unit shall also submit action taken report for stoppage of discharge of coloured effluent into choiyya drain.
4. The unit shall maintain the records for the quantity of permeate and condensate being reused and the water balance accordingly.
5. The unit shall submit adequacy report of their existing zero liquid discharge system duly validated by reputed institution such as Vasantdada Sugar Institute, Pune, National Sugar Institute, Kanpur, IITs etc.

**AND WHEREAS**, the unit's replies vide letter dated 21.04.2017 & 8.05.2017, were examined and following observations were made;

- a) The unit has informed that they have adopted latest technology to achieve ZLD.
- b) Unit has installed flow meter at MEE concentrate, web cameras at requisite positions and provide its connectivity to CPCB server earlier.
- c) Industry has provided documented proof for the packaging of the bio-compost in sealed polybag.
- d) The unit has placed order for cleaning the drain dated 14.10.2016, regarding which the unit has informed to UPPCB via letter dated 22.12.2016.
- e) The unit has provided adequacy assessment report form IIT Roorkee.

**AND WHEREAS**, on the basis of assessment report provided by M/s Mohit Petrochemical Ltd., following are the recommendations and observations;

1. The unit shall report the alcohol % (v/v) wash in house logbook.
2. The unit shall provide performance data of RO plant.
3. Installation of modern technology (CPU) for treatment and recycling of no-process effluent should have been recommended.

**(Contd..3/-)**

4. If biomethanated spentwash of 8-9<sup>0</sup> brix is concentrated from approximately 320 M<sup>3</sup>/day to 51 M<sup>3</sup>/day as mentioned in the report, then the final brix would much higher than that reported (35<sup>0</sup> Brix) in the report. Roughly, the brix of 51 M<sup>3</sup>/day of concentrated spent wash would go above 50<sup>0</sup> brix. How such concentrated spentwash can be composted? Therefore, the figures given in the report are confusing and there seems to be lot of miscalculation.
5. Generally biocomposting of concentrated spent wash is carried at about 30<sup>0</sup> brix. Biocomposting of concentrated spentwash above 30<sup>0</sup> brix becomes really difficult. Even with 30<sup>0</sup> brix concentrated spentwash the spentwash to press mud cake (PMC) ratio comes down to 1.5:1.0 with biocomposting cycle of 60 days. Therefore, the assumption taken in the report of 2.5:1.0 of concentrated spentwash to PMC is not correct.
6. As the unit is standalone distillery (not attached to a sugar mill). The unit shall provide some authentic proof of purchasing PMC from nearby sugar mills.
7. Water balance given under section 6 is vague and not correct.
8. No suggestions are given for up-gradation or improvement.
9. Biogas generation in the biogas plant logbook is shown in the range of 16,890 to 17,290 M<sup>3</sup>/day whereas in the in the plant performance data of the report it is shown in between 22000-24,000 M<sup>3</sup>/day.

**AND WHEREAS,** CPCB issued direction dated 19-06-2017 to the unit to comply with the following;

1. The unit shall submit following reports duly validated by reputed institutions like National Sugar Institute, Kanpur, Vasantdada Sugar Institute, Pune and IITs to CPCB and UPPCB within 60 days:
  - a) Assessment of the manufacturing technology for generation of spent wash and revised adequacy assessment of ZLD system comprising of Biomethanation, RO, MEE, composting/incineration system and steam availability, etc. Covering the CPCB observations/recommendations about the unit's report dated 21.4.2017 & 08.05.2017.
  - b) Water audit and mass balance reports to establish spent wash generation rate,
  - c) Action Plans to achieve Zero Liquid Discharge(ZLD),
  - d) To restrict lined effluent storage capacity to 30 days, and
  - e) Assessments of availability of press mud, compost yard, composting process, sell of compost and compost quality.
2. The unit shall install mass flow meters with totalizer at inlet of ROs/MEE, outlet of MEE and to make arrangement for continuous online transmission of spent wash flow measurements (namely Weak Spent Wash, Strong Spent Wash)/ web camera data of Spent Wash generation, concentration & MEE operation by providing linkage to CPCB & UPPCB servers within 75 days.
3. The unit shall identify recipient drains/ rivulets and their u/s & d/s locations in consultation with UPPCB for monthly monitoring by industry to ensure ZLD from distilleries within 30 days. The monitoring report shall be submitted to CPCB on monthly basis.

**(Contd..4/-)**

4. The unit will provide documentary support for procurement/ availability of press mud, sell of compost and compost quality on monthly basis (by 10<sup>th</sup> of every month) to CPCB/UPPCB.
5. To take steps for removing the colour in the drain and also to remove the deposited sludge in the bottom bed of the drain for preventing leaching out of colour in future.

**AND WHEREAS**, unit submitted adequacy assessment report prepared by VSI, Pune, on 20.08.2017 and as per the adequacy assessment, following observations are made;

1. The unit has adopted fed-batch fermentation with advanced MPR distillation. The average spentwash generated is 7.29 litres per litre of alcohol.
2. The present effluent treatment system installed for treatment and disposal of spentwash is adequate.
3. The unit has installed continuous online transmission of spent wash mass flow meters at inlet and outlet of MEE.
4. The unit has identified the recipient drain as Choiya drain but has not provided any action plan for monthly monitoring of recipient drain and hence has not submitted any analysis reports of u/s & d/s locations of Choiya drain on monthly basis ( by 10<sup>th</sup> of every month) to CPCB.
5. The unit has not provided copy of records of alcohol/rectified spirit production, spent wash generation (namely weak spent, strong spent wash) details of MEE operations, mass flow meter readings connected with CPCB server etc. on monthly basis (by 10<sup>th</sup> of every month) to CPCB.
6. The unit has provided documents in support of procurement/ availability of press mud, sale of compost and compost quality only for four months from January to April, 2017.
7. The unit has completed the cleaning of river Choiya to remove colour and also to remove the deposited sludge from the bottom bed of the drain.

**AND WHEREAS**, the unit has not complied with the following CPCB directions issued on 19.06.2017, under section 5 of Environment (Protection) Act, 1986:

1. The unit has not carried out monthly monitoring of the identified recipient drain at u/s & d/s locations.
2. The unit has not submitted analysis report of water samples collected from u/s & d/s locations of identified recipient drain on monthly basis (by 10<sup>th</sup> of every month) to CPCB.
3. The unit has not provided records of alcohol/rectified spirit production, spent wash generation (namely weak spent, strong spent wash) details of MEE operations, mass flow meter readings connected with CPCB server etc. on monthly basis (by 10<sup>th</sup> of every month) to CPCB.
4. The unit has not provided documentary support for procurement/ availability of press mud, sale of compost and compost quality on monthly basis (by 10<sup>th</sup> of every month) to CPCB.

**AND WHEREAS**, the unit is required to implement following measures besides other pollution control measures:

1. To carry out monthly monitoring of the identified recipient drain at u/s & d/s location through lab recognised under Environment (Protection) Act, 1986 and shall submit the analysis report on monthly basis ( by 10<sup>th</sup> of every month) to CPCB/UPPCB.

**(Contd..5/-)**

2. To provide copy of records of alcohol/rectified spirit production, spent wash generation (namely weak spent, strong spent wash) details of MEE operations, mass flow meter readings connected with CPCB server etc. on monthly basis (by 10<sup>th</sup> of every month) to CPCB/UPPCB in the prescribed format.
3. To use concentrated spent wash: press mud ratio of 1:1.6 and to provide documentary support for procurement/ availability of press mud, sale of compost and compost quality on monthly basis (by 10<sup>th</sup> of every month) to CPCB/UPPCB in the prescribed format.
4. To restrict the spent wash concentration to about 85 KLPD with 30% solids, as per the recommendation of VSI, Pune.
5. To install condensate polishing unit for treatment of spent lees, process condensate, cooling tower blow down etc.
6. To remove prepared biocompost from the compost yard before the start of rainy season.
7. To improve the steam economy of evaporation plant as per adequacy report recommendation
8. To take proper care of green belt surrounding the biocompost yard.
9. To implement rain water harvesting inside the distillery premise.
10. To submit the implementation status report of action taken against the recommendation of adequacy report within 15 days and to submit the revalidated adequacy assessment report carried out by the institute which has conducted adequacy of assessment and submit the reports within 45 days after resumption of operation.

**AND NOW, THEREFORE**, in view of the unit's non-compliance to CPCB directions dated 19-06-2017, and in exercise of the powers delegated to the Chairman, CPCB under section 5 of the Environment (Protection) Act, 1986, notice is served herewith to **show cause why the Unit should not be closed down** until all the necessary pollution control measures are planned and implemented so as to comply with the directions dated 19-06-2017 to the satisfaction of CPCB and also **why not impose appropriate environmental compensation charges and initiate criminal prosecution against the Unit Head.**

You are hereby given an opportunity to file your objections (if any) to the above proposed direction within 15 days from the receipt of this notice, failing which appropriate action shall be taken against the Unit without giving any further notice, in accordance with provisions of the Environment (Protection) Act, 1986.

(S. P. Singh Parihar)  
CHAIRMAN

(Contd..6/-)

Copy to:

**1. The Chairman**

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

With request to ensure that the unit  
complies with the directions.

**2. The Incharge (CP Division)**

Ministry of Environment, Forest & C.C  
Prithvi Block, Indira Paryavaran Bhawan,  
Jorbagh Road, New Delhi – 110 003

: For kind information, please.

**3. The Regional Director**

Regional Directorate  
Central Pollution Control Board  
PICUP Bhawan, Ground Floor,  
Vibhuti Khand, Gomti Nagar,  
Lucknow – 226 010.

: For follow up and ensuring  
compliance

**4. The In-charge, IT Division, CPCB**

**5. Master file/Guard file WQM-II, CPCB**



(A Sudhakar)

MEMBER SECRETARY