



**Speed Post**

B-190198/WQM-II(RG)/CPCB/Sugar/90/2017-18

12026

Oct 22<sup>nd</sup>, 2018  
26

To,

M/s Indian Potash Ltd.  
P.O.-Raja Bazar, Khadda,  
District- Kushinagar, U.P.

**DIRECTION 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 thereunder and also to meet the consent conditions granted by State Pollution Control Board (SPCBs) / Pollution Control Committees (PCCs); and

**WHEREAS**, M/s Indian Potash Ltd., Raja Bazar, Khadda, Kushinagar, U.P. (hereinafter referred as 'the Unit') is involved in the process of sugar manufacturing from crushing of cane; and

**WHEREAS**, CPCB received adequacy assessment report dated 07.03.2018 from the unit prepared by VSI, Pune; and

**WHEREAS**, the Unit was inspected on 07.03.2018 by officials from CPCB, Delhi and following observations were made;

1. During the inspection, the Unit and ETP were operational.
2. The Unit has valid consent under Water (Prevention and Control of Pollution) Act, 1974 & Air (Prevention and Control of Pollution) Act, 1981 upto 31.12.2019.
3. Effluent Treatment Plant (ETP) comprises of Oil & Grease trap, Equalisation Tank, Primary Clarifier, Aeration Tank, Secondary Clarifier, Tertiary treatment (Sand Filter & Activated Carbon Filter) and Sludge Drying Beds. However, Oil & Grease Skimmer was non-functional during inspection.

(Contd..2/-)

M/s Indian Potash Ltd., Raja Bazar, Khadda, Kushinagar, U.P.

4. The Unit has not installed air mixing arrangement in equalisation tank.
5. The analysis of treated effluent sample showed pH-7.02, as against norms of 5.5-9.0, **BOD-248 mg/l** against norms of 30 mg/l, **COD-341 mg/l** against norms of 250 mg/l, & **TSS- 55.1 mg/l** against norms of 30 mg/l which indicated non-compliance w.r.t. BOD, COD & TSS with the effluent surface discharge norms prescribed under Environment (Protection) Rules,1986.
6. Untreated effluent was observed in drain/ conveyance system nearby ETP which was connected with the conveyance system for irrigation purpose.
7. The analysis of untreated effluent sample from drain showed pH-6.84, as against norms of 5.5-9.0, **BOD-762 mg/l** against norms of 30 mg/l, **COD-1211 mg/l** against norms of 250 mg/l, & **TSS- 1233 mg/l** against norms of 30 mg/l which indicated non-compliance w.r.t. BOD, COD & TSS with the effluent surface discharge norms prescribed under Environment (Protection) Rules,1986.
8. Leakage was observed in anaerobic media tank, due to which water logging was observed nearby tank.
9. The Unit has not installed flow meters at various locations of its process.
10. Proper logbook was not maintained by the Unit for generation and disposal of ETP sludge, press mud, boiler ash, used oil etc.

**AND WHEREAS**, CPCB issued direction dated 27.04.2018 under Section 5 of the Environment (Protection) Act, 1986 the unit to comply the following

1. The Unit is directed to close down its Sugar manufacturing operations with immediate effect and shall not resume its operations.
2. The Unit shall install & Commission ETP system upto tertiary treatment level including adequate treatment system for spray pond overflow effluent in case of double sulphitation process.
3. The Unit shall restrict the effluent storage capacity to 15 days and shall construct lined lagoon.
4. The Unit shall submit irrigation management plan and utilise treated effluent meeting the prescribed norms for irrigation as per the irrigation management plan validated by expert institutions namely, NSI, Kanpur/ VSI, Pune/ Agricultural Institutions.
5. The Unit shall submit revalidated ETP adequacy assessment report to CPCB immediately.
6. The Unit shall inform to CPCB about the Closure of operation immediately.
7. The Unit shall stop bypassing of effluent and dismantle bypass arrangement immediately.
8. The Unit shall seek permission from CPCB before resumption of manufacturing operations.

**AND WHEREAS**, the compliance status of the direction 19.4.2018 submitted by the unit vide letter dated 18.7.2018 was examined; and

(Contd..3/-)

**AND WHEREAS**, the Unit submitted the revalidated adequacy assessment reports prepared by VSI, Pune vide letter dt. 29.09.2018; and as per the report following recommendations have been made by VSI, Pune.

1. Flow meters to be installed at major unit operations to ascertain and control hot and cold-water requirement.
2. Flow meters to be installed at various consumption points.
3. All pump and gland water going in ETP drain it must be recycled in to the cold-water collection tank and utilize for same purpose.
4. The unit is having adequate facility for 1600 TCD and effluent generation is estimated as 90litre/tonne for cane crushed which requires revalidated during crushing season.

**AND WHEREAS**, CPCB through an Expert Committee comprising of experts from National Sugar Institute (NSI), Kanpur, Vasantdada Sugar Institute (VSI), IITs and representatives from sugar mills prepared a Charter for Water Recycling and Pollution Prevention (thereafter referred to as the Charter); and

**WHEREAS**, a meeting of sugar mills operating in Uttar Pradesh, representatives of UPPCB and CPCB was held on 06.07.2018 under Chairmanship of Principal Secretary, Sugar Industries and Sugarcane Development, Government of Uttar Pradesh and the following decisions are made

1. Sugar Mills shall submit an action plan to CPCB by 20.07.2018 regarding the steps taken by them pertaining to the notices issued to them. Also they shall submit action plan to implement recommendations of their adequacy assessment report.
2. All sugar mills shall ensure implementation of Charter and shall submit action plan to CPCB by 20.08.2018.
3. All sugar mills shall ensure the upgradation of their ETP within August, 2018 so as to ensure no interruption in functioning of the ETP in the following seasons.
4. All sugar mills shall maintain a logbook on ETP operations on a daily basis.
5. ETP shall be operational at all times and all bypass arrangements should be dismantled with immediate effect.
6. MLSS in aeration tanks should be maintained at 2000-2500 mg/l.
7. All sugar units shall set up environmental laboratories for regular analysis of raw and treated effluent thereby ensuring proper functioning of the ETP.
8. All sugar mills shall employ dedicated technicians for operating and regular maintenance of ETP and shall also ensure that the technicians are given proper training on ETP maintenance and lab analysis on regular basis.
9. To ensure proper training of the environmental technicians all sugar mills shall facilitate training of 5 employees.
10. All sugar mills may establish an Environment Management Cell at their level consisting of concerned officials in order to ensure compliance with environmental standards at industry level itself.

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

**AND WHEREAS**, the unit vide letter dated 29.09.2018 submitted their compliance status of the Charter, which was examined and following observations were made:

1. The unit is in the process of installing necessary flow meters at requisite points as prescribed under the Charter and has assured completion of the same by 31.10.2018
2. The unit has submitted action plan/ compliance report on upgradation of ETP.
3. The unit is maintaining proper logbook for bore-well readings thereby recording their fresh water consumption on regular basis.
4. The unit has stated that no untreated/ partially treated effluent is being discharged on land.
5. The unit shall employ hydro-jet for cleaning of heat exchanger unit.
6. The unit has proposed to set up environmental laboratory with dedicated technical staff.
7. The unit has planned to arrange training for its technical staff on ETP Operation and Maintenance.
8. The unit has submitted compliance report on BMT for Water Recycling and Pollution Prevention.

**AND WHEREAS**, the Three Member Committee in its meeting held on 08.10.2018 examined the revalidated adequacy assessment report, & implementation status of the Charter and recommended that the unit may be allowed to resume operation.

**AND NOW, THEREFORE**, in view of above observations and in exercise of the powers delegated to the Chairman, CPCB under section 5 of the Environment (Protection) Act, 1986, the unit (M/s Indian Potash Ltd., Raja Bazar, Khadda, Kushinagar, U.P.) is directed to comply with the following directions before commencement of crushing season 2018-2019;

1. The unit shall start its operation only after obtaining the valid consent from the Uttar Pradesh Pollution Control Board.
2. The unit shall implement the observation & recommendation of the revalidated adequacy assessment of ETP.
3. The unit shall install sealed flow meter along with running hours meter on bore wells so as to ascertain usage of fresh water for various uses.
4. The unit shall install flow meters at major areas of cold and hot water consumption.
5. The unit shall install flow meters for measuring generation of effluent from various prominent areas.
6. The unit shall maintain logbook for individual process unit for recording daily water consumption and effluent generation also.
7. The unit shall carry out colour coding of pipelines carrying recycled process water and fresh process water before commencement of crushing season 2018-2019.
8. The Unit shall commission mechanical sludge handling system of adequate capacity
9. The unit shall carry out analysis of effluent discharge parameters notified under Environment (Protection) Rules, 1986 and logbook shall be maintained on daily basis.

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

10. The unit shall submit the implementation status of the Charter in the form of Affidavit and the documentary proof of the completion of the work as committed in the action plan.
11. The unit shall submit implementation status of the Charter and performance adequacy audit of ETP including actual assessment of water consumption and effluent generation duly validated by reputed govt. expert institute namely NSI Kanpur, VSI Pune, IITs during crushing season & submit the report to CPCB within 60 days of resumption of operation.

In case of default in compliance with the above directions, CPCB will be constrained to initiate action against the Unit (**M/s Indian Potash Ltd., Raja Bazar, Khadda, Kushinagar, U.P.**) without giving any further notice in accordance with the provisions of the Environment (Protection) Act, 1986.

(**S. P. SINGH PARIHAR**)  
CHAIRMAN

25.10.18

**Copy to:**

1. **Principal Secretary,**  
Sugarcane Development and Sugar Industry,  
Sugarcane and Sugar commissioner,  
Govt. of Uttar Pradesh  
17, New Beri Road, Dalibagh,  
Lucknow, Uttar Pradesh- 226001

With request to ensure compliance  
of the directions.

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

: With request to ensure compliance  
of the directions.

3. **Joint Secretary (CP Division)**  
Ministry of Environment, Forest & C.C  
Prithvi Block, Indira Paryavaran Bhawan,  
Jorbagh Road, New Delhi – 110 003

: For kind information, please.

4. **District Magistrate**  
Kushinagar, U.P.

: With request to ensure compliance  
of the directions.

5. **Superintending Engineer**  
Madhyanchal Vidyut Vitaran Nigam Ltd  
Kushinagar, U.P.

: To reconnect the power supply of  
the unit, please

(Contd..6/-)

o/c

Handwritten signature

M/11

6. **Regional Director**  
Regional Directorate  
Central Pollution Control Board, PICUP  
Bhawan, Ground Floor, Vibhuti Khand,  
Gomti Nagar,  
Lucknow – 226 010
7. In-charge, IT Division, CPCB
8. Master file/Guard file, WQM II, CPCB  
Delhi

: For follow up and ensuring  
compliance

  
(Prashant Gargava)  
MEMBER SECRETARY