



Speed Post

B-190198/WQM-II(RG)/CPCB/Sugar/46/2016-17 (2352)

1st November, 2018
6th

To,

M/s L.H. Sugar Factories Ltd.,
Civil Lines, Pilibhit,
U.P.-262001

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 L.H. Sugar Factories Ltd., Civil Lines, Pilibhit, U.P. (hereinafter referred as 'the Unit') is involved in the process of sugar manufacturing from crushing of cane; and

WHEREAS, the unit was inspected on 04.01.2017 by the officials of Central Pollution Control Board; and

WHEREAS, CPCB issued direction dated 15.06.2017 to the Unit under section 5 of Environment Protection Act, 1986 for carrying out adequacy assessment through reputed technical institutes; and

WHEREAS, CPCB received adequacy assessment report vide letter dt. 09.10.2017 on from the unit prepared by NSI, Kanpur; and

WHEREAS, CPCB issued direction dated 02.11.2017 under section 5 of Environment (Protection) Act, 1986 to the unit to comply with the following directions;

(Contd..2/-)

M/s L.H. Sugar Factories Ltd., Civil Lines, Pilibhit, U.P.

1. The unit shall start its operation only after obtaining valid consent from the concerned State Pollution Control Board.
2. The Unit shall submit action plan within 15 days to implement the recommendations (including the general observation) of the adequacy report within 45 days.
3. 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 (Brine recovery system to be installed in case of sugar refinery having Ion Exchange Process for sugar melt de-colorization).
4. The Unit having high pressure boiler (>45 Kg/cm²) shall install & Commission Condensate Polishing Unit (CPU) within 45 days for treatment of condensate water to ensure its reuse & recycle within the process.
5. The Unit shall restrict the effluent storage capacity to 15 days.
6. The Unit shall 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.
7. The Unit shall implement the observation and recommendation of the adequacy report within 45 days.
8. The Unit shall get the verification of implement status of the recommendation of adequacy report including ETP performance assessment & effluent generation assessment done by the same institute which carried out adequacy assessment and submit the report to CPCB within 45 days from date of resumption of manufacturing operations.
9. The analysis result of the treated effluent shall also be submitted within 45 days through EPA recognised laboratories.
10. If the Unit fails to provide the verification report duly validated by the expert institutions, the Unit shall automatically stop all its manufacturing operations after 45 days from date of resumption of manufacturing operations.

AND WHEREAS, the unit has submitted the implementation status of recommendations of adequacy report vide letter dt. 06.11.2017 to CPCB; and

WHEREAS, the unit (M/s L.H. Sugar Factories Ltd., Civil Lines, Pilibhit, U.P.) was inspected on 30.01.2018 by officials from CPCB, Delhi and following observations were made;

1. During the inspection, the ETP was found operational.
2. The Unit has applied for valid consent under Water (Prevention and Control of Pollution) Act, 1974 & Air (Prevention and Control of Pollution) Act, 1981 to UPPCB.
3. The analysis of treated effluent sample shows pH-7.51 as against norms of 5.5-9.0, **BOD-66.5 mg/l** against norms of 30 mg/l, COD- 240 mg/l against norms of 250 mg/l and **TSS-218 mg/l**, against norms of 30 mg/l which indicates non-compliance w.r.t. BOD and TSS with the effluent discharge norms prescribed under Environment (Protection) Rules, 1986.
4. The MLSS in aeration tank is 1178 mg/l which indicates unstabilised Activated Sludge Process system due to poor operation and maintenance of ETP system.

(Contd..3/-)

5. The Unit has not installed the flow meters at various locations i.e. Mills, D.M./ R.O. Plant, boilers, cleaning process etc.
6. The Unit has constructed the lagoon but not in operation due to cleaning work.
7. Discharge lines were found beside the main discharge line to nallah and effluent could directly be discharged into to nallah. This shows that there could be a possibility of bypass arrangement of effluent.
8. A discharge point with control valve in the clear water tank was noticed. The tank is before the tertiary treatment, which may be the potential discharge point of partially treated effluent without tertiary treatment.
9. The Unit has not submitted the revalidated ETP adequacy assessment report within 45 days to CPCB.

AND WHEREAS CPCB issued show cause notice dated 19.03.2018 under Section 5 of the Environment (Protection) Act, 1986; and

WHEREAS, the unit has submitted the compliance status of the show cause notice dated 19.3.2018 vide letter dated 05.04.2018 and following observations were made;

1. The unit has dismantled the discharge line with control line in the clear water tank before the tertiary treatment.
2. The unit has installed flow meters at mills D.M/R.O plant, boilers, cleaning process etc.
3. The unit has obtained consent for Air and Water from UPPCB for the year 2018 and 2019.

WHEREAS, the unit submitted the revalidated adequacy assessment reports and irrigation management plan validated by NSI, Kanpur vide letter on 26.03.2018; and as per the report following recommendations have been made by NSI, Kanpur:

1. The unit has installed flow meters at major unit operations e.g. filter cake washing, pan boiling, molasses conditioning, centrifugals washing etc. to ascertain the fresh water requirement for factory and other uses.
2. The unit needs to install more flow meters as per the recommendation from NSI.
3. Documentation and record keeping shall be maintained by the units.
4. The unit shall install CPU keeping in view installation of high pressure boiler.
5. The unit shall adopt rain water harvesting system.
6. The unit is storing its treated effluent in lagoon which is further used in wet scrubber and for irrigation purpose also.
7. The unit is having inadequate sludge drying bed for both operating and licensed capacity.
8. The unit is having adequate system for 11000 TCD as effluent generation is 159 litre/ton of cane crushed.

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

(Contd..4/-)

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.

AND WHEREAS, the unit vide letter dated 18.07.2018 submitted their compliance status of the Charter, which was examined and following observations were made:

1. The unit is using its treated condensate in cooling tower.
2. The unit is disposing its ash in filling of low lying land.
3. The unit has installed flow meters at requisite positions.
4. The unit has provided connectivity of OEMS to CPCB server.
5. The unit has not installed CPU.
6. The unit has submitted compliance report on BMT for Water Recycling and Pollution Prevention.

AND NOW, THEREFORE, in view of the above observation, and exercising powers delegated to the Chairman, Central Pollution Control Board under section 5 of the Environment (Protection) Act, 1986, the unit (M/s L.H. Sugar Factories Ltd., U.P) is directed to comply with the following directions;

1. The unit shall implement the observation & recommendation of the revalidated adequacy assessment of ETP including installation of CPU for having boiler of capacity >45 kg/cm²
2. 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.

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3. The unit shall install flow meters at major areas of cold and hot water consumption.
4. The unit shall carry out colour coding of pipelines carrying recycled process water and fresh process water.
5. The unit shall maintain logbook for individual process unit for recording daily water consumption and effluent generation also.
6. The unit shall carry out analysis of effluent discharge parameters notified under Environment Protection Rules, 1986 and log book shall be maintained on daily basis.
7. The unit shall maintain logbook for individual process unit for recording daily water consumption and effluent generation also.
8. 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.
9. The unit shall commission mechanical sludge handling system of adequate capacity.
10. The unit shall submit implementation status of the Charter and performance audit of ETP duly validated by reputed expert institute namely NSI Kanpur, VSI Pune, IITs during crushing season & submit the report to CPCB within 60 days of resumption period.

In case of default in compliance with the above directions, CPCB will be constrained to initiate action against the Unit (M/s L.H. Sugar Factories Ltd., U.P) without giving any further notice in accordance with the provisions of the Environment (Protection) Act, 1986.


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

Copy to:

1. **Principal Secretary (Sugar)**
 Sugar Industry and Cane Development
 Department,
 "G" Block 2/3, Mantri Wing, 4th Floor
 Bapu Bhawan, Vidhan Sabha Marg
 Lucknow- 226 001
2. **Chairperson**
 Uttar Pradesh Pollution Control Board,
 Building No. TC-12V, Vibhuthi Khand,
 Gomti Nagar, Lucknow – 226 010
3. **Joint Secretary (CP Division)**
 Ministry of Environment, Forest & C.C
 Prithvi Block, Indira Paryavaran Bhawan,
 Jorbagh Road, New Delhi – 110 003

With request to ensure compliance of the directions.

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: For kind information, please.

(Contd..6/-)

4. **District Magistrate**
Pilibhit-262001, U.P.

: With request to ensure compliance
of the directions.

5. **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

6. In-charge, IT Division, CPCB

7. Master file/Guard file WQM II, CPCB Delhi


(PRASHANT GARGAVA)
MEMBER SECRETARY