



Speed Post

B-190198/WQM-II(RG)/CPCB/Sugar/65/2016-17

November 2, 2018

To,

M/s Lakshmi Ji (Shree Ajudhia) Sugar Mills Ltd.  
Raja-Ka-Sahaspur, Bilari,  
Moradabad-202415  
Uttar Pradesh

**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 Lakshmi Ji (Shree Ajudhia) Sugar Mills Ltd., Raja-Ka-Sahaspur, Bilari, Moradabad, U.P. (hereinafter referred as 'the Unit') is involved in the process of sugar manufacturing from crushing of cane; and

**WHEREAS**, CPCB issued direction dated 02.08.2017 under section 5 of Environment Protection Act, 1986 to the Unit to remain closed till compliance of the following directions : i) Submission of ETP adequacy assessment report ii) Time bound action plan of ETP augmentation iii) Water audit and mass balance report iv) Action plan to achieve notified effluent discharge quality and generation standards v) Irrigation management plan vi) restriction of storage of treated effluent in lined lagoon only for 15 days and other general direction pertaining to proper running of effluent treatment system, with all the reports and action plans validated by reputed institutions like National Sugar Institute (NSI), Kanpur/Vasantdada Sugar Institute (VSI), Pune /IITs submitted to CPCB within 60 days; and

**WHEREAS**, the CPCB received adequacy assessment report vide letter dated 29.09.2017 on 11.10.2017 from the Unit prepared by VSI, Pune and reply dated 25.10.2017 requesting for revocation of closure order issued to the Unit on 02.08.2017; and

**WHEREAS**, CPCB issued direction vide letter dated 10.11.2017 under section 5 of Environment (Protection) Act, 1986 to the Unit to comply with the following directions:

1. The Unit shall start its operation only after obtaining valid consent from the concerned State Pollution Control Board.
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 (Brine recovery system to be installed in case of sugar refinery having ion Exchange Process for sugar melt de-colorization).

3. The Unit having high pressure boiler (>45 Kg/cm<sup>2</sup>) shall install & Commission Condensate Polishing Unit (CPU) within 45 days for treatment of condensate water to ensure its reuse & recycle within the process.
4. The Unit shall restrict the effluent storage capacity to 15 days.
5. 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.
6. The Unit shall implement the observation and recommendation of the adequacy report within 45 days.
7. 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.
8. The analysis result of the treated effluent shall also be submitted within 45 days through EPA recognised laboratories.
9. 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 (M/s Lakshmi Ji (Shree Ajudhia) Sugar Mills Ltd., Raja-Ka-Sahaspur, Bilari, Moradabad, U.P.) was inspected on 09.01.2018 by officials from CPCB, Delhi and following observations are made:

1. The Unit and the ETP were operational at the time of operation.
2. The Unit does not have valid authorization of Hazardous Waste Management.
3. The analysis of treated effluent sample shows pH-7.89 as against norms of 5.5-9.0, BOD-12 mg/l against norms of 30 mg/l, COD-50 mg/l against norms of 250 mg/l and **TSS-33 mg/l** against norms of 30 mg/l.
4. Waste water generation is **257.28 Litre/ tonne** (83.68 L/t from ETP outlet + 173.6 L/t from Spray pond overflow) which is higher than the permissible limit.
5. The Unit has constructed a lagoon with a capacity of 9040 m<sup>3</sup>.
6. The treated effluent is being discharged through the pipeline which opens outside the industrial premises into nearby drain.
7. At the time of visit, the drain was found carrying the hot effluent being discharged from industrial premises. The drain shortly opens into the Sot river which is a tributary of river Ganga.
8. Molasses was being stored in open lagoon which is few meters away from the ETP rather than storing it in the storage tank.
9. ETP comprises of oil and grease removal chamber, equalisation tank (with agitators), settling tank, primary clarifier, 3 no. of aeration tank (provided with 3000 diffusers), secondary clarifier, tertiary treatment facility consisting of ACF and PSF and sludge drying beds.
10. The untreated spray pond over flow is transferred into ETP. After treatment, the ETP effluent is released into the lagoon through underground pipeline.
11. The Unit is abstracting water through bore well which is provided with flow meter. The final reading as recorded from bore well at the time of visit was 4356.1 m<sup>3</sup>. The minimum consumption of water is approximately 96-100 KLD.
12. The Unit has installed OCEMS and provided connectivity with CPCB server.

13. The Unit has not submitted the irrigation management plan.
14. The Unit has not submitted the revalidated ETP adequacy assessment report within 45 days to CPCB.

**AND WHEREAS**, a show cause notice was served to the Unit on 11.04.2018 under Section 5 of Environment (Protection) Act, 1986; 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.

**AND WHEREAS**, the Unit has submitted its reply and supporting documents including implementation status of charter, validation report on Water balance & ETP, irrigation management plan adequacy claiming compliance to show cause notice issued to the Unit vide letters dated 04.05.2018, 04.06.2018, 06.06.2018, 19.07.2018, 28.07.2018 and 31.08.2018, were examined and following salient points were observed:

1. The Unit has applied for hazardous waste authorization to state pollution control board.
2. Unit has submitted validation of water balance and ETP adequacy report prepared by VSI, Pune and following is observed
  - a. Mill was found operational at 2884.8TCD during seasonal operation, which is less than the installed capacity.
  - b. Net fresh water requirement after recirculation of all cooling water and excess hot water condensate after cooling tower including domestic use is 56.89m<sup>3</sup>/day.

- c. The total measured effluent generation including spray pond over flow was found to be 436.0 m<sup>3</sup>/day which comes to 159.45 L/tonne of cane crushed which is adequate considering the Unit was running under capacity.
  - d. Pump and gland cooling water 35.00 m<sup>3</sup>/day which was earlier directly discharged to the ETP gutter is now reduced by installing mechanical seal to pumps.
  - e. Mill has adopted dry cleaning.
  - f. Flowmeters were installed to measure quantity of fresh water extraction from tube well, spray pond overflow, excess condensate generation, ETP inlet and outlet with records maintained of the same.
  - g. New aeration tank has been constructed and found working properly.
  - h. All civil and electrochemical modifications except chlorination in the ETP were completed.
  - i. Unit has set up a well-equipped environmental laboratory near ETP and an Environmental Officer has been appointed.
3. Unit has installed chlorination system after secondary clarifier as per recommendation of VSI to minimize microbial activity in treated effluent.
  4. Unit has submitted record of OCEMS data, ETP inlet/outlet flow meter data spray pond flow meter data in support of waste water generation by the Unit.
  5. Unit has submitted the irrigation management plan for use of treated effluent prepared by VSI, Pune.
  6. Unit has submitted the status report and action plan of compliance towards the charter for water recycling & pollution prevention in sugar factories and validation report of water balance and ETP adequacy of their Unit
  7. Unit has informed that it is under planning technical upgradation of their ETP for sulphate removal in consultation with VSI, Pune as required in BMT.
  8. Unit has not provided the status of arrangement for storage of molasses in storage tanks, in place of present practice of storing the molasses in open lagoon.

**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 Lakshmi Ji (Shree Ajudhia) Sugar Mills Ltd., Raja-Ka-Sahaspur, Bilari, Moradabad, U.P.) is directed to comply with the following directions before commencement of crushing season 2018-19:

1. The Unit shall operate within the ETP capacity available.
2. The Unit shall operate the effluent treatment plant properly as to achieve the notified treated effluent discharge standards as per Standard G.S.R. 35 (E), MoEF & CC, January 14, 2016.
3. The unit shall implement the observation & recommendation of the revalidated adequacy assessment of ETP.
4. 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.
5. The unit shall install flow meters at major areas of cold and hot water consumption.
6. The unit shall install flow meters for measuring generation of effluent from various prominent areas.
7. The unit shall maintain logbook for individual process unit for recording daily water consumption and effluent generation also.
8. The unit shall carry out colour coding of pipelines carrying recycled process water and fresh process water.
9. The Unit shall commission mechanical sludge handling system of adequate capacity.

10. The Unit will carry out analysis of parameters of treated effluent notified under Environment (Protection) Rules, 1986 on daily basis and maintain its logbook.
11. 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.
12. 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 expert Government institutes 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 Lakshmi Ji (Shree Ajudhia) Sugar Mills Ltd., Raja-Ka-Sahaspur, Bilari, Moradabad, U.P.**) without giving any further notice in accordance with the provisions of the Environment (Protection) Act, 1986.

  
(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 : For kind information, please.
2. **The Chairman**  
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. **The District Magistrate**  
Moradabad-202415, U.P. : For kind information, please.
5. **The Regional Directorate**  
Regional Director  
Central Pollution Control Board, PICUP Bhawan,  
Ground Floor, Vibhuti Khand, Gomti Nagar,  
Lucknow – 226 010 :For follow up and ensuring  
compliance
6. The In-charge, IT Division, CPCB : For uploading on CPCB website
7. Master file/Guard file WQM II, CPCB Delhi : For record

  
(PRASHANT GARGAVA)  
MEMBER SECRETARY