



**Speed Post**

B-190197/WQM-II(RG)/CPCB/Sugar/16 /2016-17

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November 14<sup>th</sup>, 2018

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To,

M/s Doiwala Sugar Company Ltd.  
Doiwala, Dehradun,  
Uttarakhand-248140

**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 Doiwala Sugar Company Ltd., Doiwala, Dehradun, Uttarakhand (hereinafter referred as 'the Unit') is involved in the process of sugar manufacturing from crushing of cane; and

**WHEREAS**, CPCB issued direction under section 5 of Environment (Protection) Act, 1986 to the unit for carrying adequacy assessment of ETP; and

**WHEREAS**, CPCB received adequacy assessment report vide letter dated 12.10.2017 from the Unit prepared by VSI, Pune; and

**WHEREAS**, CPCB issued direction dated 10.11.2017 under section 5 of Environment Protection Act, 1986 to the Unit to comply with the following directions;

(Contd..2/-)

1. The Unit shall start its operation with reduced capacity of 6500 TCD till the recommendation of the adequacy report are implemented.
2. The Unit shall start its operation only after obtaining valid consent from the concerned State Pollution Control Board.
3. The Unit shall submit implementation status of action plan before 30.11.2017.
4. 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).
5. 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.
6. The Unit shall implement the observation and recommendation of the adequacy report within 45 days.
7. The Unit shall restrict the effluent storage capacity to 15 days.
8. 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.
9. 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.
10. The analysis result of the treated effluent shall also be submitted within 45 days through EPA recognised laboratories.
11. 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 implementation status of recommendations of adequacy report vide letter dated 30.11.2017; and

**WHEREAS**, the Unit (M/s Doiwala Sugar Company Ltd., Doiwala, Dehradun, Uttarakhand) was inspected on 16.03.2018 by officials from CPCB and following observations were made;

1. The Unit and ETP were operational.
2. The Unit was operational without valid consent to operate. The Unit has applied for valid consent under Water (Prevention and Control of Pollution) Act, 1974 & Air (Prevention and Control of Pollution) Act, 1981.
3. The Unit has applied for NOC from Central Ground Water Authorisation (CGWA).
4. Effluent Treatment Plant (ETP) comprised of Bar Screen, Oil & grease trap, Equalisation Tank, Anaerobic Tank, Primary Clarifier, Aeration Tank, Secondary Clarifier and Sand Filter & Carbon Filter.

(Contd..3/-)

5. The analysis of treated effluent sample shows pH-7.33 as against norms of 5.5-9.0, **BOD-34 mg/l** against norms of 30 mg/l, COD- 91 mg/l against norms of 250 mg/l, **TSS- 49 mg/l** against norms of 30 mg/l and TDS- 860 mg/l against norms of 2100 mg/l which indicates non-compliance w.r.t. BOD & TSS against surface water discharge norms prescribed under Environment (Protection) Rules,1986.
6. MLSS in aeration tank was **878 mg/l** which indicates unstabilised Activated Sludge Process system due to poor operation and maintenance of ETP system and possibility of dilution of ETP system.
7. The Unit does not have separate provision for treatment of effluent from spray pond overflow.
8. Flow meters were installed at bore wells, inlet and outlet of ETP. However, flow meters were not installed at manufacture processes.
9. Treated effluent is discharged into a drain which ultimately meets the Song river.
10. Lagoon was under construction for storage of treated effluent in low demand period of irrigation.
11. The Unit has not submitted irrigation management plan.
12. The Unit has not submitted revalidated ETP adequacy assessment report within 45 days from the date of resumption of operation to CPCB.

**AND WHEREAS**, CPCB has issued show cause notice dt.10.05.2018 under Section 5 of the Environment (Protection) Act, 1986 to the unit as the unit failed to meet the effluent discharge norms; and

**WHEREAS**, the Unit vide letter dt. 07.06.2018 submitted the revalidated adequacy assessment reports prepared by VSI, Pune which was examined and following observations were made:

1. The unit has installed flow meters to measure quantity of fresh water extraction, spray pond overflow, excess condensate, ETP inlet and outlet.
2. The unit has adopted dry cleaning.
3. Treated effluent was complying with the discharge norms.
4. The unit is having adequate treatment system for installed capacity of 2500 TCD and effluent generation is estimated as 13.2 l/t of cane crushed.

**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 Uttarakhand, representatives of UEPPCB and CPCB was held on 19.07.2018 under Chairmanship of Cane and sugar Commissioner Uttarakhand, Government of Uttarakhand and the following decisions were made;

1. Sugar Mills shall submit an action plan to CPCB by 31.07.2018 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 before commencement of crushing season.
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 31.07.2018 submitted their compliance status of the Charter, which was examined and following observations were made:

1. The unit is maintaining log books of daily ETP performance.
2. The unit has established Environmental Management Cell and ETP laboratory.
3. The unit has adopted dry cleaning of floors by bagasse.
4. The unit is treating spray pond overflow water in ETP.

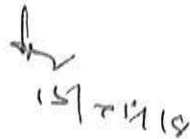
**AND NOW, THEREFORE**, in view of the above observation, and exercising powers delegated to the Chairman, Central Pollution Control Board under section 5 of the Environment (Protection) Act, 1986, the unit (M/s Doiwala Sugar Company Ltd. Doiwala, Dehradun, Uttarakhand) is directed to comply with the following directions before commencement of crushing season 2018-2019;

1. The unit shall implement the observation & recommendation of the revalidated adequacy assessment of ETP.
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.
3. The unit shall install flow meters at major areas of cold and hot water consumption.
4. The unit shall install flow meters for measuring generation of effluent from various prominent areas.
5. The unit shall maintain logbook for individual process unit for recording daily water consumption and effluent generation also.

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6. The unit shall carry out colour coding of pipelines carrying recycled process water and fresh process.
7. The Unit shall commission mechanical sludge handling system of adequate capacity.
8. The unit shall carry out analysis of effluent discharge parameters notified under Environment (Protection) Rules, 1986 and logbook shall be maintained on daily basis.
9. 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.
10. 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 government 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 Doiwala Sugar Company Ltd. Doiwala, Dehradun, Uttarakhand) without giving any further notice in accordance with the provisions of the Environment (Protection) Act, 1986.

  
(S. P. Singh Parihar)  
CHAIRMAN

Copy to:

1. **Cane and Sugar Commissioner  
Uttarakhand**  
Village Hempur Ismile, Bazpur Road,  
Kashipur District, Udham Singh Nagar,  
Uttarakhand-244713
2. **Member Secretary**  
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.

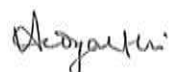
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4. **Regional Directorate**  
Regional Director  
Central Pollution Control Board, PICUP Bhawan,  
Ground Floor, Vibhuti Khand, Gomti Nagar,  
Lucknow - 226 010

✓ 5. In-charge, IT Division, CPCB

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

:For follow up and ensuring  
compliance



(PRASHANT GARGAVA)  
MEMBER SECRETARY