



B-Tannery/IPC-IV/2018-19/ 14852

SPEED POST
January 03, 2019

To

M/s Indian Leathers,
18 km mile stone, G.T. Road,
Nathupur, Sonapat, Haryana

Sub.: Show Cause Notice under Section 5 of the Environment (Protection) Act, 1986 regarding non-compliance of notified norms.

WHEREAS, the tanneries are identified as one of the 17 categories of highly polluting industries which have been discharging environmental pollutants directly or indirectly into the ambient air and water, having potential threat to cause adverse effect on the water and air quality; and

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, there is need to inculcate habit of self-monitoring within the industries for complying with the prescribed standards and this can be achieved by the methods like installing online effluent and emission monitoring devices; and

WHEREAS, for strengthening the monitoring and compliance through self-regulatory mechanism, online source emission and effluent monitoring systems need to be installed and operated by the industries on 'polluter pays principle'; and

WHEREAS, a direction under section 18 (1) (b) of the Water (Prevention & Control of Pollution) Act, 1974 and the Air (Prevention & Control of Pollution) Act, 1981 was issued on February 05, 2014 to all the State Pollution Control Boards (SPCBs)/ Pollution Control Committees (PCCs) for installation of online effluent monitoring system w.r.t. pH, BOD, COD, TSS, and Flow parameters in Tanneries; and

WHEREAS, considering the requests/ representations received from industries/ industrial associations/ SPCBs / PCCs, an extension of time up to June 30, 2015 for installation of online monitoring systems was granted vide direction dated March 02, 2015 under section 18 (1) (b) of the Water (Prevention & Control of Pollution) Act, 1974 and the Air (Prevention & Control of Pollution) Act, 1981; and

WHEREAS, a letter vide dated May 29, 2015 was issued by the Chairman CPCB to all the SPCBs/ PCCs informing that no further extension of time will be given after June 30, 2015 and withdrawal of consent to operate along with forfeiture of bank guarantee of non-complying units; and

WHEREAS, concerned SPCB/ PCC issued directions under section 33A of the Water (Prevention & Control of Pollution) Act, 1974 and section 31A of the Air (Prevention & Control of Pollution) Act, 1981 to install the online monitoring system by June 30, 2015 and to submit bank guarantee of 100% of the cost of online emission & effluent monitoring system; and

WHEREAS, the Ministry of Environment & Forests, Government of India, vide Notifications No. S. O. 157 (E) of 27.02.1996 and S. O. 730 (E) dated 10.07.2002, has delegated the powers vested under Section 5 of the Environment (Protection) Act, 1986 (29 of 1986) to the Chairman, Central Pollution Control Board, to issue directions to any industry or any local body or any other authority for violations of the standards and rules notified under the Environment (Protection) Rules, 1986 and amendment thereof; and

WHEREAS, inspection of M/s Indian Leathers, 18 km mile stone, G.T. road, Nathupur, Sonapat, Haryana (hereafter referred as "Unit") was conducted by a team of officers from CPCB Regional Directorate Lucknow on March 16, 2018 to check the status of compliance of prescribed norms; and

WHEREAS, it was observed during inspection that the unit is engaged in processing of raw hide to finished leather with installed capacity of 500 Pcs/day. During inspection, Unit was not in operation and no industrial activity was observed however, manual wetting of tanned leather was carried out for trading. The observations were as follows :

1. The Unit's representative reported that Unit is closed since 12.10.2017.
2. The unit is having ETP based on biological treatment system clubbed with Dual Media filter and Carbon filter. During inspection, ETP was not in operation, however, effluent generated from manual wetting was collected at collection tank
3. Samples collected from collection tank were analysed and observed that it is not meeting with the prescribed standards in respect of TSS - 277mg/l (standard - 100 mg/l), BOD - 478mg/l (standard - 30 mg/l), and Total Chromium - 43.2 (standard - 2mg/l).
4. During inspection, no discharge of effluent was observed however, Unit reported that treated effluent from ETP is discharged into adjacent canal which meets river Yamuna.
5. The Unit has installed OCEMS at the ETP outlet and it was found offline.
6. The Unit has installed Chrome Recovery Plant (CRP) for treatment of chrome bearing effluent, however, it was found in defunct condition
7. The Unit has not installed separate energy meters for operation of ETP & CRP.
8. Separate drainage system for segregating chrome bearing effluent was not observed.
9. Hazardous Waste Management was found in poor condition. ETP sludge is disposed off in open land near ETP without sending to TSDF site.
10. Height of the DG set stack installed by the unit is not as per norms and it is not equipped with acoustic enclosures.
11. The Unit has obtained consents under the Water (P&C of Pollution) Act, 1974 and the Air (P&C of Pollution) Act, 1981 which are valid up-to 30.9.2019 and also obtained Authorization under the Hazardous & other Wastes (M & TBM) Rules, 2016 which is valid upto 30.9.2019.

WHEREAS, the above compliance status had indicated violation of notified norms and standards. In view of that , the Chairman, CPCB had issued following Closure Directions to the Unit under section 5 of the Environment (Protection) Act, 1986 on 18.04.2018 :

1. **M/s Indian Leathers, 18th km mile stone, G.T. Road, Nathupur, Sonapat, Haryana** is hereby directed to close down all of its manufacturing activities with immediate effect.
2. The unit shall submit a time-targeted action plan within 15 days for rectification of the short comings as described above.

3. The unit shall not re-start its manufacturing activities without written permission from CPCB.

WHEREAS, the Unit vide letters dated 11/6/2018 and 16.06.2018 had informed about the steps taken to improve pollution control practices and requested for revocation of the Closure Directions. The industry had submitted following documents as documentary evidences in support of measures taken :

- a. An undertaking on stamp paper duly notarised to the effect that compliance of the CPCB directions has been done.
- b. Copies of Water Consent , Air Consent and Authorization issued by Haryana SPCB . All these Consents / Authorization are valid upto 30.09.2019.
- c. A report on ETP Adequacy prepared by M/s Vardan Environet , Gurgaon.
- d. Photographs on measures undertaken by the industry to improve pollution control practices so as to comply with CPCB Directions.

WHEREAS, the case of revocation of the closure directions issued to the unit was examined by the 'Committee' constituted by CPCB during its meeting convened on June 26, 2018 and the Committee had recommended for revocation of Closure Directions subject to certain conditions; and

WHEREAS, in view of the above and in exercise of the powers delegated to the Chairman, Central Pollution Control Board under Section 5 of the Environment (Protection) Act, 1986, the closure directions issued to the Unit namely : **M/s Indian Leathers, 18th km mile stone, G.T. Road, Nathupur, Sonapat, Haryana** were revoked on 02.07.2018 for a period of 3 months only from the date of issue of these Revocation Directions and the unit was permitted to restart the manufacturing operations , subject to following conditions :

1. The Unit shall engage some government agency viz. CLRI Chennai/IIT Delhi / IIT Roorkee /NPC/ Govt. Engg. College / University for judging the adequacy of ETP and performance evaluation and report be submitted to CPCB within 45 days from the date of issue of these Revocation Directions.
2. CPCB shall re-inspect the unit within 2 months from the date of issue of these Revocation Directions to verify claims of the Unit.
3. The Unit shall ensure all time compliance with prescribed discharge norms and proper functioning of OCEMS.
4. The unit shall run only with valid Consent from Haryana State Pollution Control Board under the Water (Prevention & Control of Pollution) Act, 1974 , Air (Prevention & Control of Pollution) Act, 1981 and Authorization under the Hazardous & Other Wastes (Management & Transboundary Movement) Rules, 2016.
5. Based on 1 to 4 above, decision shall be taken by CPCB for 'Full & Final Revocation of Closure Directions'. In case of failure of the Unit to comply with directions, action as deemed fit under the provisions of Environment (Protection) Act, 1986 shall be taken against the Unit.

WHEREAS, the Unit has complied with regard to conditions 1 and 4 above; and

WHEREAS, the Unit was re-inspected by Regional Directorate – North , Lucknow on 09.10.2018 so as to check the status of rectification of shortcomings and following observations requiring attention of CPCB are made:

- a. The values of MLSS and MLVSS in the aeration tank are observed as 96 mg/l and 89 mg/l which are much on the lower-side.
- b. A flexible pipe is seen installed at inlet to ETP which needs to be eliminated with a fixed pipe arrangement.
- c. Separate drainage system for segregating chrome bearing effluent is not seen.
- d. The unit needs to install electromagnetic flow meter at the Borewell and maintain proper log book.
- e. The unit should obtain NOC from CGWA for ground water abstraction.
- f. The unit needs to install pressure gauge at filtration system to avoid the negative effect and replace media of the same.
- g. Separate energy meter and proper access to CRP are required to be provided.
- h. The unit should immediately send stored hazardous waste /ETP sludge to TSDF site for final disposal.
- i. Sludge Handling System needs to be further improved especially with regard to rainy season/winter season.
- j. Proper record keeping of energy consumption, chemical consumption, ETP & CRP operation and sludge handling are to be maintained.

NOW, THEREFORE, in view of the above and in exercise of the powers vested under Section 5 of the Environment (Protection) Act, 1986 to the Chairman, CPCB, notice is hereby served to M/s Indian Leathers, 18 km mile stone, G.T. road, Nathupur, Sonapat, Haryana to show cause as to why your industry should not be closed down for the shortcomings observed during inspection on 09.10.2018 as detailed above.

The Unit shall submit its reply within a period of 15 days from the date of receipt of this notice failing which appropriate action shall be taken against the Unit, without giving any further opportunity, in accordance with provisions of the Environment (Protection) Act, 1986.

[S.P. Singh Parihar]
Chairman

04.01.2019

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Copy for kind information & Compliance to :

1.	The Chairman, Haryana State Pollution Control Board, C-11, Sector-6. Panchkula-134109, Haryana	With a request to ensure compliance of the directions please.
2.	The District Magistrate - Sonapat SH 11, Ashok Vihar, Sonapat, Haryana 131001	For information please
3.	The Joint Secretary (CP Division), Ministry of Environment, Forest & C.C., Prithvi Block, Indira Paryavaran Bhawan, Jorbagh Road, New Delhi - 110003.	
4.	The Regional Director, Regional Directorate- North, Central Pollution Control Board, PICUP Bhawan, Gound Floor, Vibhuti Khand, Gomti Nagar, Lucknow - 226010.	
5. ✓	The Divisional Head , IT Division, CPCB-HO., Delhi	
6.	The Divisional Head , IPC-VI Division, CPCB-HO., Delhi	

Prashant
[Prashant Gargava]
Member Secretary