



No. Tannery/ online/IPC-IV/2018-19/

Speed Post
23.08.2018

To:

M/s M.A. Raheem Quraishi & Sons
6-13-38, Safai Basthi, Kothagudem,
Telangana

Sub: Directions under Section 5 of the Environment (Protection) Act, 1986 regarding Non-compliance of notified norms.

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

WHEREAS, Central Pollution Control Board (CPCB) issued Directions under section 18 (1) (b) of the Water (Prevention & Control of Pollution) Act, 1974 on February 05, 2014 to all the State Pollution Control Boards (SPCBs)/ Pollution Control Committees (PCCs) to ensure installation of Online Continuous Effluent Monitoring System in tannery industries for online measurement of Flow, pH, TSS, BOD and COD parameters and connecting and uploading the monitoring data on the Servers of concerned SPCB/ PCC and CPCB by March 31, 2015; and

WHEREAS, CPCB clarified vide guidelines dated November 7, 2014 as uploaded on CPCB website that flow meter and web camera may be installed in case of Units with zero liquid discharge (ZLD) by March 31, 2015 and vide FAQs posted on CPCB website in September 2015 that CETP member units shall install only online electromagnetic flow meter and web camera; and

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

WHEREAS, Chairman, CPCB vide letter dated May 29, 2015 informed to all the SPCBs/PCCs 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 will be the only option; and

WHEREAS, in exercise of the powers delegated to the Chairman, CPCB under section 5 of the Environment (Protection) Act, 1986, a show-cause notice for Closure cum Directions dated July 22, 2015 was issued to tannery industries including your Unit namely M/s M.A. Raheem Quraishi & Sons 6-13-38, Safai Basthi, Kothagudem, Telangana (hereafter referred as "Unit") for non-

M/s M.A. Raheem Quraishi & Sons, 6-13-38, Safai Basthi, Kothagudem, Telangana
परिवेश भवन पूवा अर्जुन नगर, दिल्ली-110032

Parivesh Bhawan, East Arjun Nagar, Delhi-110032

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installation of OCEMS by June 30, 2015 which also directed for submission of documentary evidence regarding status of installation of online effluent monitoring system; and

WHEREAS, it was observed from the Unit's reply to the above notice and the information received from SPCB that the Unit has not installed OCEMS; and

WHEREAS, the Unit was having individual ETP and thus required to install OCEMS for Flow, pH, TSS, BOD and COD parameters; and

WHEREAS, Chairman, CPCB in exercise of the powers delegated, under section 5 of the Environment (Protection) Act, 1986, issued final notice to the Unit vide letter dated 10.12.2016 to install OCEMS and provide data connectivity to CPCB Central Portal by January 31, 2017; and

WHEREAS, the Unit did not submit any reply to the final closure notice and accordingly Chairman, CPCB issued closure directions under Section 5 of the Environment (Protection) Act, 1986 to the Unit vide letter dated March 17, 2017; and

WHEREAS, the Unit vide letter dated October 09, 2017 informed about installation of OCEMS and its connectivity to CPCB and submitted self-certificate of closure and accordingly requested CPCB for revoke of closure directions; and

WHEREAS, the case of revocation of the closure directions issued to the unit was examined by CPCB at appropriate levels and the Closure Directions issued to the Unit on 17.03.2017 were revoked on Nov. 21, 2017 subject to following conditions :

4. The Unit shall run with valid Consent under the Water (Prevention & Control of Pollution) , Act, 1986 from the Telangana State Pollution Control Board.
5. The Unit shall ensure all time compliance with the prescribed discharge norms and proper functioning of OCEMS.
6. The unit shall be inspected within a period of one month from the date of issue of these revocation directions by CPCB Regional Directorate - South, Bengaluru to verify the compliance.

WHEREAS, in order to ensure compliance of the CPCB Revocation Directions dated Nov. 21, 2017, a team of Scientists from Regional Directorate - South, CPCB, Bengaluru, inspected the industry i.e. M/s M.A Raheem Quraisi & Sons, 6-13-38, Safai Basthi, Kothagudem, Telangana on 24.1.2018 and major observations requiring attention of the Regulating Authorities were as follows :

- i. The Unit is engaged in processing of raw hides to semi-finished leather through vegetable tanning with consented capacity of 1000 pieces per day. During inspection, Unit was in operation with reported production of 600 pieces per day i.e. not at full capacity.
- ii. Source of water is the ground water and industry has not installed water meters to quantify freshwater consumption.
- iii. The Unit is having ETP based on biological treatment system and the finally treated effluent is being used for gardening purpose. Samples collected at the outlet of ETP

M/s M.A Raheem Quraisi & Sons, 6-13-38, Safai Basthi, Kothagudem, Telanga

were analysed and observed that it is meeting with the prescribed standards in respect of BOD₃ days (27°C) - 23 mg/l (standard - 30 mg/l) and TSS - 8mg/l (standard - 50mg/l).

- iv. The industry has installed OCEMS . However, during inspection, data of only BOD parameter was displayed in CPCB Server. Data in respect of other parameters was not displayed.
- v. Large variations in the values recorded by OCEMS and manual monitoring were observed which indicated that proper calibration of the OCEMS were not being made. It was informed by the industry that the calibration is done only once in a year . The unit failed to produce calibration certificate.

WHEREAS, in exercise of powers vested under Section 5 of the Environment (Protection) Act, 1986, **M/s M.A. Raheem Quraishi & Sons, 6-13-38, Safai Basthi, Kothagudem, Telangana** had been directed on 20.03.2018 to comply with the following directions:

- i. The Unit shall rectify the problem of OCEMS instrument immediately and shall calibrate OCEMS regularly as per protocol to ensure correct effluent monitoring.
- ii. The Unit shall ensure proper maintenance and operation of OCEMS so as to obtain continuous accurate results in respect of all the parameters namely pH, TSS, COD, BOD and flow.
- iii. The unit shall explain the reasons for large variations observed between laboratory analysis results and OCEMS values.
- iv. The Unit shall install electromagnetic water meter at the bore-well and shall maintain records of the same.
- v. The Unit shall ensure compliance with the prescribed discharge norms and proper functioning of OCEMS at all the times.
- vi. The unit shall initiate necessary actions in respect of directions as mentioned in i to 5 above and submit compliance report to CPCB within 30 days; and

WHEREAS, the Unit had communicated compliance of the directions dated 20.03.2018 issued by CPCB vide its letter dated 29.04.2018 ; and

WHEREAS, the Unit was again inspected by a team of Scientists from Regional Directorate - South, CPCB, Bengaluru on 20.7.2018 based on exceedances of OCEMS readings and several shortfalls with regard to pollution control practices adopted by the unit are noticed. These observations require immediate action at the level of the unit and the same are as follows :

1. The industry has not provided flow meter at the inlet of ETP.
2. During inspection, the unit was not in operation. As a result ETP was also not in operation. However, it was found that ETP is not operated regularly and also scientifically as required to be operated in case of an Activated Sludge Process / Biological Treatment System.
3. Neither the primary sludge nor the secondary sludge from the respective clarifiers have been discharged into Sludge Drying Beds. The sand in the bed looked as fresh / unutilized without any traces of sludge onto it.
4. The overall maintenance of ETP was not satisfactory.
5. The calibration Certificates for pH analyzer & flow meter [OCEMS] were not made available.



M/s M.A Raheem Quraishi & Sons, 6-13-38, Safai Basthi, Kothagudem, Telanga

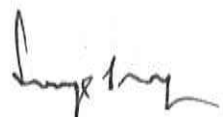
6. ETP is not equipped with separate energy meter. No record-keeping / log book is maintained for activities related to operation of pollution control systems.
7. No display Board was found at the entrance of the factory having details like name & address of the industry, specific CTO conditions like validity of consent, standards prescribed for treated effluent etc.
8. There is no separate arrangement for draining out rain water as a result the effluent channel (opened one) going from the plant to ETP was found overflowing with rain water and joining the primary treatment system, i.e., Oil & Grease trap-> Grit Chamber ->Eq. cum Neutralization Tank. As these primary treatment units have been constructed at ground level, these units were also found overflowing during inspection.
9. The industry has not installed any water meter to record the quantity of water consumed per day.

NOW, THEREFORE, in exercise of powers delegated to the Chairman, CPCB under Section 5 of the Environment (Protection) Act, 1986, **M/s M.A. Raheem Quraishi & Sons, 6-13-38, Safai Basthi, Kothagudem, Telangana** is hereby directed to initiate remedial measures immediately for rectification of the shortcomings as observed during inspection on 20.07.2018 & detailed in serial number 1 to 9 above. The unit is further directed for the following :

1. **The process for rectification of shortcomings shall be completed by Sept. 17, 2018 and Action Taken Report be forwarded to CPCB .**
2. The unit shall run only with valid Consents from Telangana 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.

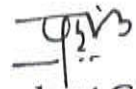
In case of default in compliance with the above directions, CPCB will be constrained to initiate appropriate actions against the Unit, without giving any further notice, in accordance with provisions of the Environment (Protection) Act, 1986.




(S.P. Singh Parihar)
Chairman
27/8/18

Copy to:

1.	The Chairman, Telangana State Pollution Control Board Paryavaran Bhavan, A-III, Industrial Estate, Sanath Nagar, Hyderabad, Telangana	For information & necessary action please.
2.	The Joint Secretary (CP Division) Ministry of Env., Forests and Climate Change Indira Paryavaran Bhawan, Aliganj, Jor Bagh Road New Delhi - 110003	For information please.
3.	The Regional Director, Central Pollution Control Board Regional Directorate (South) 1st & 2nd Floors, Nisarga Bhavan A-Block, Thimmaiah Main Road 7th D Cross, Shivanagar, Bengaluru -560 079	With request to inspect the Unit and submit the inspection report within 01 month from the date of issue of these revocation directions .
4. ✓	The Divisional Head, IT Division, CPCB, Delhi	For necessary action please.
5.	The Divisional Head IPC-VI Division, CPCB, Delhi	


[Prashant Gargava]
Member Secretary

