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28.11.2019  
9.12.2019

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**, the unit was inspected on 16.03.2018 by officials from CPCB; and

**WHEREAS**, CPCB issued show cause notice dt.10.05.2018 under Section 5 of the Environment (Protection) Act, 1986 to the unit; and

**WHEREAS**, the unit submitted their reply vide letter dt. 05.06.2018 along with the ETP adequacy assessment report prepared by VSI, Pune; 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 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.

'परिवेश भवन' पूर्वी अर्जुन नगर, दिल्ली-110032

Parivesh Bhawan, East Arjun Nagar, Delhi-110032

दूरभाष/Tel : 43102030, 22305792, वेबसाइट/Website : www.cpcb.nic.in

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; and

**WHEREAS**, CPCB issued direction dated 19.11.2018 under section 5 of the Environment (Protection) Act, 1986 to the unit to comply with the following directions before commencement of crushing season 2018-2019;

1. The unit shall implement the observation and 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.
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 and submit the report to CPCB within 60 days of resumption of operation.

**AND WHEREAS**, the unit reply vide letter dated 5.12.2018 was examined; and

**WHEREAS**, the unit was inspected on 25.03.2019 by team of CPCB officials and following observations were made;

1. The unit has installed flowmeter at bore wells, inlet and outlet of ETP
2. The unit has not properly maintained log books of individual flow meters.
3. The unit has done colour coding of pipelines partially.
4. OCEMS was found non-functional.
5. The unit has not installed mechanical sludge handling system.
6. Analysis of treated effluent sample from ETP outlet showed pH-7.36 against norms of 5.5-8.5, **BOD-70mg/l** against norms of 30 mg/l, COD- 169 mg/l against norms of 250 mg/l, **TSS- 54mg/l** against norms of 30 mg/l and TDS- 792 mg/l against norms of 2100 mg/l which indicates non-compliance w.r.t. BOD & TSS with the effluent discharge norms for surface water as prescribed under Environment (Protection) Rules, 1986, as the unit discharges the treated effluent into nearby drain (Alla Rakhi Canal).
7. The value of MLSS was 1693 mg/l and MLVSS was 76 mg/l.
8. Ground water sample analysis indicates exceedance of **Fe- 47.05mg/l** w.r.t BIS standards of 0.3 mg/l.

**AND WHEREAS**, CPCB issued show cause notice dt. 06.06.2019 under Section 5 of the Environment (Protection) Act, 1986 to the unit; and

**WHEREAS**, the unit reply vide letter dated 22.06.2019 was examined and following observations are made:

1. The mechanical problems of flow meters were rectified in 1<sup>st</sup> week of April 2019 and since then these meters are working satisfactorily and log book is being maintained.
2. The complete colour coding of pipelines will be done before start of crushing season 2019-20.
3. OCEMS system's modem and sensor were not functioning properly which have been now replaced and it became functional and connected with CPCB server since 01.04.2019.
4. The unit is planning for installing mechanical sludge handling system and the unit is having three sludge drying beds.
5. The unit has full-fledged ETP. During inspection, reverse activated sludge system was stopped due to mechanical defect resulting in increase in BOD and TSS levels. Later, the parameters were within limits.
6. Ground water naturally contain higher concentration of Fe in this area.

**AND WHEREAS**, CPCB vide letter dated 13.09.2019 asked the unit to submit the following documents:

1. Ground water analysis report from environmental laboratory recognized under Environment (Protection) Act, 1986.
2. Logbook of the flow meters from April 2019 to the end of crushing season.

**AND WHEREAS**, the unit reply vide letter dated 30.09.2019 was examined and following observations are made:

1. The unit has submitted ground water analysis report from five different locations by NABL accredited lab indicating that iron content in ground water nearby factory campus is within the permissible limit of 0.3 mg/l.
2. The unit has submitted logbook of the flow meters installed for the month of April 2019 to the end of crushing season viz. 29.04.2019.

**NOW, THEREFORE**, in view of above observations and in exercise of powers delegated to Chairman CPCB under Section 5 of the Environment (Protection) Act, 1986, the unit (M/s Doiwala Sugar Company Ltd., Doiwala, Dehradun) is directed to comply with the following directions:

1. The unit shall provide performance assessment of treatment system through analysis of treated effluent by the reputed government institute/ EPA recognized lab within 60 days from resumption of operation in next crushing season 2019-20.

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

1. **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.
2. **Cane and Sugar Commissioner  
Uttarakhand**  
Village Hempur Ismile, Bazpur Road,  
Kashipur District, Udham Singh Nagar,  
Uttarakhand-244713 : With directions to ensure following actions:  
a) To ensure compliance of directions.  
b) To constitute surveillance team for  
monitoring of sugar mills to stop any  
bypass/ discharge of untreated effluent.  
c) To organize surprise inspection of the unit  
on monthly basis to ensure that ETP is  
properly operated and treated effluent is  
complied with the norms.  
d) To obtain undertaking from sugar mills  
that they will not indulge in bypass of  
effluent and will maintain functional ETP.
3. **Member Secretary**  
Uttarakhand Environment Protection &  
Pollution Control Board, 29/20, Nemi  
Road, Dehradun, Uttarakhand-248001
4. **District Magistrate**  
Dehradun, Uttarakhand,-248001
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. The In-charge, IT Division, CPCB : With request to upload on CPCB server.
7. Master file/Guard file, WQM II, CPCB  
Delhi
8. In-charge, F&A, CPCB

  
(PRASHANT GARGAVA)  
MEMBER SECRETARY