



Speed Post

B-190198/NGRBA(RG)/CPCB/Distillery/52/2018-19 95

May, 4<sup>th</sup> 2020

May 11<sup>th</sup> 2020

To,  
M/s Rana Sugars Ltd., (Distillery Division)  
Khasra No. 318, 319, 320, Village: Belwara,  
Post: Manpur,  
Tehsil & District: Moradabad  
Uttar Pradesh-244001

**DIRECTION UNDER SECTION 5 OF THE ENVIRONMENT (PROTECTION) ACT,  
1986-CLOSURE THEREOF**

**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 Rana Sugars Ltd., (Distillery Division), Belwara, Manpur, Moradabad, Uttar Pradesh (hereinafter referred as 'the Unit') is involved in the production of Ethanol using molasses (B heavy & C heavy molasses) as raw material; and

**WHEREAS**, CPCB issued directions dated 5<sup>th</sup> February, 2014 under section 18 (1) (b) of the Water (Prevention and Control of Pollution) Act, 1974 to all State Pollution Control Boards (SPCBs)/Pollution Control Committees (PCCs) for installation of Online effluent monitoring systems w.r.t. pH, BOD, TSS, COD and flow parameters in all industries falling under 17 categories of Highly Polluting Industries; and

**WHEREAS**, CPCB issued directions dated 2<sup>nd</sup> March, 2015 under section 18 (1) (b) of the Water (Prevention and Control of Pollution) Act, 1974 to all SPCBs/PCCs for granting extensions of time up to 30<sup>th</sup> June, 2015 for installation of online monitoring system; and

'परिवेश भवन' पूर्वी अर्जुन नगर, दिल्ली-110032

Parivesh Bhawan, East Arjun Nagar, Delhi-110032

**WHEREAS**, CPCB issued letters dated 29<sup>th</sup> May, 2015 to all the SPCBs/PCCs to inform that no further extension of time will be given after June, 2015 and withdrawal of consent to operate along with forfeiture of bank guarantee of non-complying units will be the only option; and

**WHEREAS**, UPPCB issued show cause notice dated 07.08.2019 to the unit for disposal of colour effluent through tanker into Dhela river causing adverse impact on river water quality; and

**WHEREAS**, CPCB received a public complaint dated 22.08.2019 from Paper Unit Chapter of Kumaun Garhwal Chamber of Commerce and Industry regarding high colour observed in river Dhela at Bhojpur Bridge (a tributary of river Ramganga) due to discharge of spent wash through tankers from nearby distillery; and

**WHEREAS**, Water quality monitoring of entire stretch of River Dhela (12 locations), its two tributaries (02 locations) and three drains (04 locations) was carried out jointly by team of CPCB, UPPCB and UEPPCB officials from its origin at Kanda Range, Nainital in Uttarakhand to confluence with river Ramganga at Moradabad, UP in September, 2019 and identified M/s Rana Sugars Ltd. (Distillery division), Belwara, Moradabad, UP was identified as one of GPI having potential to discharge their effluent into river Dhela and its drains; and

**WHEREAS**, during Magh Mela, 2020, monitoring of water quality of river Dhela was carried out by joint team of officials from CPCB, UPSPCB and UEPPCB, on fortnightly basis. Analysis of river water sample collected on 10.02.2020 from river Dhela at village Bhojpur showed Colour-8 Hazen, DO-zero, BOD-32 mg/l, COD-99 mg/l, which indicates high pollution in river Dhela; and

**WHEREAS**, to verify the compliance status of grossly polluting industrial units having potential to contribute pollution load into River Dhela, M/s Rana Sugars Ltd., (Distillery Division), Belwara, Moradabad, U.P was inspected by a team of CPCB & UPPCB officials on 19.02.2020 and made the following observations:

1. On the day of inspection, the distillery unit was found operational for production of Ethanol at 80 KLD capacity using B heavy molasses as raw material.
2. A tanker filled with effluent/spent wash was observed coming out from the plant. It was informed by the driver of the tanker that effluent filled in the tanker, would be disposed at village Lodhipur, which is about 35 kms from the unit. Sample was collected from the tanker to identify the source of effluent.
3. Analysis results of the samples collected during inspection from various points in the production process and spent wash management system are mentioned below:

Sr. No.	Sample Location	pH	COD (mg/l)	BOD (mg/l)	TSS (mg/l)	TDS (mg/l)	TS (mg/l)	Color (Hazen)	SO <sub>4</sub> <sup>2-</sup> (mg/l)
1.	Spent Lees	4.65	427	313	18	408	-	33	-
2.	Raw Spent Wash	4.84	1,09,881	42,600	-	-	1,33,392	10,404	-
3.	IMEE Concentrate	4.80	2,78,261	-	-	-	3,77,540	-	-
4.	CPU (RO) Inlet	5.83	304	188	BDL	436	-	12	-
5.	Combined permeate of RO-I & II	5.31	134	98	BDL	16	-	12	-

6.	Reject (final RO)	5.59	704	391	13	1,016	-	15	-
7.	Condensate (Holding Tank)	6.74	292	153	BDL	280	-	12	-
8.	Spent wash from bio-compost spray	4.01	1,10,672	-	-	-	1,31,372	-	-
9.	Feed to lagoon	4.74	1,42,293	-	-	-	1,79,448	-	-
10.	Stored spent wash in lagoon	4.14	2,13,439	-	-	-	3,61,036	-	-
11.	Tanker	4.02	1,50,198	54,500	6,977	-	1,33,304	8832	7610

4. Analysis results of samples collected from the tanker showed **pH-4.02, BOD-54,500 mg/l, COD-150198 mg/l, Colour-8832 hazen, TS-133304 mg/l, Sulphate-7610 mg/l and TSS-6977 mg/l** which indicates illegal disposal of spent wash through tanker.
5. Analysis result of samples collected from various points in the production process and spent wash management system comprising of IMEE, RO, CPU and lagoon at bio-composting sites indicates that spent wash being utilised for bio-composting contain pH-4.01, Total solids-131372 mg/l and COD-110672 mg/l, as against concentrated spent wash at IMEE outlet containing pH-4.80, Total solids-377540 mg/l and COD-278261 mg/l.
6. It appears that the unit is utilising its raw spent wash with Total solids-13 % as against desired 30% solid concentration (as per CPCB directions dated 07/12/2015) for bio-composting, which clearly indicates bypassing of IMEE for concentration of spent wash.
7. The unit has only stored the concentrated spent wash having solid content beyond 30 % (here 37.7 %) in the lagoon however, raw spent wash is used either for bio-composting or disposing outside the premises through tankers. The characteristics of spent wash being transferred through tankers for illegal disposal and spent wash used at bio-compost yard spray are of same quality with total solids of about 13 %.
8. The unit is either bypassing IMEE or utilizing raw spent wash in bio-composting, for which compost area of about 29 acres (covered) is required as against adequate area of about 19 acres to use all the raw spent wash in bio-composting. In the absence of adequate bio-compost area, the unit has chosen route to dispose excess raw spent wash through tanker outside of the premises.
9. Security guard located at gate informed that record of such tanker movement, which is illegal, is not maintained in the unit's entry/exit logbook/register by the unit.
10. The unit has Consent to Operate under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981, which are valid up to 31.12.2020.
11. The unit has valid authorization (for Spent oil) under Hazardous and Other Waste (Management and Transboundary Movement) Rules, 2016, which is valid up to 02.02.2025.

12. The unit has common 03 nos. of bore wells for distillery and sugar unit to meet the water requirement of production and domestic purpose. As informed during inspection, the unit is using about 370-400 KLD of fresh water in distillery division from tube well no. 3.
13. The unit has 03 stage falling film type Integrated Multi Effect Evaporator (IMFE) having design capacity of 650 m<sup>3</sup>/day followed by Condensate Polishing Unit of 30 m<sup>3</sup>/hr capacity for treatment of condensate from IMEE.
14. In CPU, the unit is having Holding tank, Pressure Sand Filter, Activated Carbon Filter, RO (1st stage), RO (2nd stage) and Treated Water Holding tank. Treated water (Permeate of RO-1 & 2) is being utilized in cooling tower and cooling tower blow down is collected and treated in CPU. Reject of RO-2 is sent to IMEE.
15. The unit have installed Condensate Polishing Unit of 30 m<sup>3</sup>/hr capacity having RO based technology for treatment of condensate from IMEE. Cooling tower blow down is also treated in CPU along with condensate from IMEE.
16. The unit has total 19 acres of active area for bio-composting. Among total 19-acre area, 07-acre area is covered and remaining 12-acre area is uncovered.
17. Spent wash generation rate is 4.5 KL/KL of alcohol production (as informed by the unit, average SW generation from B heavy type molasses).
18. The unit has not complied with the consent conditions of installation of Online Continuous Emission Monitoring System (OCEMS) and providing its connectivity to CPCB/UPPCB servers for uninterrupted data transmission.
19. The unit has one lagoon of 19,250 m<sup>3</sup> capacity for storage of concentrated spent wash. As per CPCB direction dated 07.12.2015, maximum allowed storage capacity in the lagoon is equivalent of 30 days storage of concentrated spent wash i.e. 4300 m<sup>3</sup> (considering spent wash generation rate is 4.5 KL/KL of ethanol production).
20. As on 19.02.2020 approx. 6470 m<sup>3</sup> quantity of concentrated spent wash was found stored in lagoon, against the allowed 4300 m<sup>3</sup>, which indicates the unit is not properly utilizing the spent wash in bio-composting.
21. As per the consent condition, the unit is allowed to operate its plant for 365 days. The unit is having total 19 acres of bio-compost area, out of which only 07 acres is covered. Considering the consent condition, the unit is not having adequate covered compost yard to operate its plant throughout the year.
22. Rain water collection system provided at bio-compost yard was not proper, as the collected rain water would ultimately mix with the bio-compost windrows.
23. No proper logbook is maintained for spent wash generation, spent wash storage in lagoon and spent wash utilization in bio-composting. In absence of proper record possibility of illegal disposal of spent wash outside of the unit's premises through tanker could not be ruled out.
24. The unit has installed web cameras at entry/exit gate of the unit, but footage of the same was not provided by the unit representative and it was informed that they are not keeping any back up/record of the footages at the time of inspection.

**It is evident that the unit is habitual to dispose spent wash through tanker into River Dhela or nearby villages posing potential threat to the land and water body which causes grave injury to the environment. Physical verification by the officials of CPCB and UPPCB confirms illegal disposal of spent wash outside the premises through tankers. The unit has also not installed Online Continuous Emission Monitoring System (OCEMS) and provided its connectivity to CPCB/UPPCB servers which is violation of CPCB/UPPCB directions/Consent conditions; and**

**WHEREAS**, Hon'ble NGT vide its orders dated 03.08.2018 and 19.02.2019 in Original Application No. 593/2017 (W.P. (Civil) No. 375/2012), Paryavaran Suraksha Samiti & Anr. Vs. Union of India & Ors. directed that *"The CPCB may take penal action for failure, if any, against those accountable for setting up and maintaining STPs, CETPs and ETPs. CPCB may also assess and recover compensation for damage to the environment and said fund may be kept in a separate account and utilized in terms of an action plan for protection of the environment"*; and

**WHEREAS**, in compliance of above quoted Hon'ble NGT order, cases to be considered for levying penalty are discharges in violation of consent conditions/ non-compliance with the directions, such as direction for closure due to non-installation of OCEMS/ non-adherence to the action plans submitted/ intentional avoidance of data submission or data manipulation by tampering OCEMS; and

**WHEREAS**, as per Environmental Compensation policy framed in compliance of NGT order dated 31.08.2018 in O.A no. 593/2017, the unit is levied to deposit environmental compensation (EC) for illegal disposal of spent wash into ambient environment-land and water resulting into acute injury and damage to the environment; and

**AND WHEREAS**, as per policy for levying Environmental Compensation for industries dated 04.09.2019, Environmental Compensation to be levied on the unit has been calculated as Rs.3,16,50,000/- for illegal disposal of spent wash for the period from initial observation of such disposal dated 31.07.2019 to 04.03.2020; and

**NOW THEREFORE**, in view of the above and in exercise of the powers delegated to the Chairman, Central Pollution Control Board (CPCB) under section 5 of the Environment (Protection) Act, 1986, the unit M/s Rana Sugars Ltd. (Distillery unit), Belwara, Post: Manpur, Tehsil & District: Moradabad, Uttar Pradesh-244001, is directed to stop all its manufacturing operations immediately till compliance with following directions and also to show cause **why environmental compensation of Rs. 3,16,50,000/- should not be levied:**

1. The unit shall stop all its manufacturing operations with immediate effect and report to CPCB immediately.
2. The unit shall immediately stop illegal disposal of effluent/spent wash outside of the industrial premises.
3. The unit shall submit record of spent wash generation, spent wash storage in lagoon, spent wash utilization in bio-composting, availability of press mud, composting process, sell of bio-compost and quality of bio-compost from the date of commissioning of the unit.
4. The unit shall install OCEMS (flow meters and web cameras as per the guidelines uploaded on CPCB website dated 7<sup>th</sup> November, 2014), mass flow meter with totalizer (at inlet & outlet of IMEE), web cameras (at bio-compost yard, lagoon & at entry/exit gate) and shall provide its connectivity to CPCB/UPPCB server.
5. The unit shall restrict its lagoon capacity equivalent to 30 days of concentrated spent wash generation by dismantling/levelling /filling the excess capacity of the lagoon and shall submit time bound action plan for the same within 15 days.
6. The unit shall submit Adequacy Assessment report of the installed spent wash management system duly validated by a technical institution like VSI, Pune, NSI, Kanpur or IITs etc.

- a. Assessment of the manufacturing technology for generation of spent wash and adequacy assessment of ZLD system comprising of Biomethanation, RO, MEE, composting/incineration system and steam availability, etc.
  - b. Water audit and mass balance reports to establish spent wash generation rate,
  - c. Action Plans to achieve Zero Liquid Discharge (ZLD), and
  - d. Assessments of availability of press mud, compost yard, composting process, sell of compost and compost quality.
7. The unit shall operate its spent wash management system, such as Integrated MEE continuously to reduce the volume of raw spent wash to min. 40 % with 30 % solid concentration. Only concentrated spent wash with solid concentration of 30% shall be stored in lagoon and be utilized for bio-composting. Condensate from IMEE shall be adequately treated through CPU for use in process.
  8. The unit shall seek permission from CPCB before restart of manufacturing operations after compliance of the above directions.

In case of default in compliance with the above directions by the Unit (**M/s Rana Sugar Ltd., Distillery division, Belwara, Moradabad, UP**), CPCB will be constrained to initiate appropriate action against the Unit, in accordance with the provisions of the Environment (Protection) Act, 1986.

  
**(RAVI S PRASAD)**  
 CHAIRMAN

**Copy to:**

1. **Member Secretary**  
Uttar Pradesh Pollution Control Board,  
Building No. TC-12 V, Vibhuti Khand  
Gomti Nagar, Lucknow-226010
2. **District Magistrate**  
District: Moradabad  
Uttar Pradesh-244001
3. **Joint Secretary (CP Division)**  
Ministry of Environment, Forest & C.C  
Prithvi Block, Indira Paryavaran Bhawan,  
Jorbagh Road, New Delhi – 110 00
4. **The Regional Director**  
Regional Directorate  
Central Pollution Control Board  
PICUP Bhawan, Ground Floor,  
Vibhuti Khand, Gomti Nagar,  
Lucknow – 226 010.
5. **Superintending Engineer,**  
Urja Bhawan  
Pashchimanchal Vidyut Vitran Nigam  
Ltd., Victoria Park, Meerut 250001  
Circle-Electricity Urban Distribution  
Circle, Moradabad  
Division- Electricity Urban Distribution  
Division, Moradabad

: With request to arrange physical verification of closure, sealing and disconnection of power supply in compliance to the closure direction

: For kind information, please

: For follow up and ensuring compliance


: With request to disconnect the power supply for industrial operations. However, power supply for domestic and security purposes to continue.

*Handwritten signature*

6. The In-charge, IT Division, CPCB

: With request to upload on CPCB website  
please

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



**(PRASHANT GARGAVA)**  
**MEMBER SECRETARY**