



SPEED POST

May 22, 2019

B-Tannery/IPC-IV/2019-20/ 1470
To

M/s N K Trading Company,
Village Durina, Gurugram Road,
District Jhajjar, Haryana

Sub.: Revocation of Closure Directions issued under Section 5 of the Environment (Protection) Act, 1986.

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

Arjun

'परिवेश भवन' पूर्वी अर्जुन नगर, दिल्ली-110032

Parivesh Bhawan, East Arjun Nagar, Delhi-110032

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

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, 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, your industry, M/s N K Trading Company, Village Durina, Gurugram Road, District Jhajjar Haryana was inspected by a team of Scientists from Regional Directorate - North, CPCB, Lucknow on 26.11.2018 based on exceedance of OCEMS alerts. It is observed that the unit is a tannery engaged in processing of wet blue skin to finished leather with consented capacity of 2000 Nos of skins/day (1000 kg/day). As reported by the unit, it was processing 1000 nos. of skins (500 kg/day) on the day of inspection. Major observations requiring attention of Regulating Authorities are as follows:

1. The unit was in operation but its ETP was found as non-operational.
2. The unit meets its water requirement through one bore well for industrial and domestic purpose but it has not obtained NOC from Central Ground Water Authority (CGWA) for extraction of the ground water.
3. During inspection, ETP units namely chemical dosing tank, primary settling tank, aeration tank, secondary tank, tube settler, multi grade filter, activated carbon filter were found as non-functional. Also, the sludge drying beds were without any sludge with them.
4. The industry has made arrangement for by-passing the untreated effluents by way of providing a pump with flexible pipe from raw effluent tank to final outlet point. This flexible pipe discharges untreated effluents onto land.
5. The samples were collected from ETP Inlet and outlet as described in 4 above. Analysis results of the same are tabulated as follows :

Sampling locations	Parameters									
	pH	TSS	TDS	BOD	Sulphide	COD	O&G	T-Cr	Cr ⁺⁶	SAR
Inlet of ETP	7.85	131	8500	713	--	1602	--	--	--	--
Final outlet of ETP	5.82	677	6156	39	60.4	241	BDL	--	BDL	9.42
Prescribed Standards	6.5-9.0	100	---	30	01	---	10	02	--	--

All values are in mg/l except pH .

M/s N K Trading Company, Village Durina, Gurugram Road, District Jhajjar Haryana

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6. It is evident from the above analysis results of effluents that the unit is not complying with prescribed norms in respect of TSS , BOD and Sulphides .
7. During inspection, the team has observed that online systems (OCEMS) extract sample from the stagnate plastic container. The unit has provided a separate pipeline for extraction of treated effluent stream to OCEMS system for analysis which was found offline from the final outlet effluent stream. During visit,, team had taken effluent sample from stagnate plastic container which is used in OCEMS system for analysis through flow injection sample technique. A Sample was collected by CPCB and analysis result of the same is as follows:

Sampling location	Parameters (All in mg/l except pH)				
	pH	SS	TDS	BOD	COD
OCEMS submerged point	5.53	9.76	6320	63	518

It is obvious that neither the location of OCEMS is representative nor the values are complying with prescribed standards in respect of BOD and COD both.

8. The unit has not provided pressure gauge system at filtration system which is needed for avoiding the choking problem.
9. Online OCEMS values of pH 6.72, TSS 33.33 mg/l, BOD 06.25 mg/l were observed during sampling time on OCEMS system. It is clear that analytical values and OCEMS values are not matching and having large variations.
10. The unit has made a temporary storage room for storing of the Hazardous Wastes but records of the same are not maintained.
11. The unit has not provided display board on the main gate which is required for indicating name of the industry and usage of chemicals.

WHEREAS, in view of the above non-compliance and in exercise of powers delegated to the Chairman, CPCB issued directions under Section 5 of the Environment (Protection) Act, 1986, on 24.01.2019 to M/s N K Trading Company, Village Durina, Gurugram Road, District Jhajjar Haryana was directed to close down all of its manufacturing activities with immediate effect till all the necessary pollution control measures are planned and implemented so as to comply with effluent discharge standards and prescribed protocol. The unit was further directed for the following :

1. The unit shall submit a time-targeted action plan within 15 days for rectification of the short comings as mentioned from Sr. No. 1 to 10 above.
2. The unit shall not re-start its manufacturing activities without written permission from CPCB.

WHEREAS, the Unit vide its letters dated 13.02.2019 and 10.04.2019 had communicated compliance of CPCB Closure orders and submitted following documents as documentary evidences in support of measures taken :

M/s N K Trading Company, Village Durina, Gurugram Road, District Jhajjar Haryana



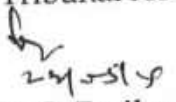
- i. Adequacy Report of the ETP, provided by Jamia Milia Islamia (A Central University), New Delhi.
- ii. Affidavit on Stamp Paper duly Notarized.
- iii. Drawing of ETP
- iv. Data/Information
- v. Letter of undertaking for proper operation.
- vi. Copy of Log Book.

WHEREAS, the case of revocation of the closure directions issued to the unit was examined by the '3 Member Committee' constituted by CPCB during its meeting convened on 25.04.2019 and the Committee has recommended for revocation of Closure Directions issued to the Unit subject to certain conditions.

NOW THEREFORE, 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 N K Trading Company, Village Durina, Gurugram Road, District Jhajjar, Haryana are hereby revoked subject to fulfilment of following conditions :

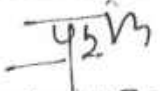
1. The industry shall arrange performance evaluation of the Effluent Treatment Plant and Air Pollution Control Devices including analysis of treated effluent and emissions by the same institute i.e. Jamia Milia Islamia (A Central University), New Delhi, within a period of sixty days from the date of resuming the operations and report be submitted to CPCB.

The unit shall ensure compliance of these directions failing which action shall be taken against the Unit, without giving any further opportunity, in accordance with provisions of the Environment (Protection) Act, 2006 and National Green Tribunal Act, 2010.


[S. P. S. Parihar]
Chairman

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.
2.	The Chairman cum Managing Director Uttar Haryana Bijli Vitran Nigam Limited (UHBVNL) Vidyut Sadan, Plot No.: C16, Sector-6, Panchkula, Haryana	The electricity supply to the industry be restored with immediate effect.
3.	The Deputy Commissioner, Jhajjar Mini Secretariat, DC Office, Jhajjar Jhajjar (Haryana) dcjir@hry.nic.in	With a request to ensure compliance of the directions.
4.	The Joint Secretary (CP Division), Ministry of Environment, Forest & C.C., Prithvi Block, Indira Paryavaran Bhawan, Jorbagh Road, New Delhi - 110003.	For information and necessary action.
5.	The Regional Director, Regional Directorate- North, Central Pollution Control Board, PICUP Bhawan, Gound Floor, Vibhuti Khand, Gombi Nagar, Lucknow - 226010.	
6.	The Divisional Head , IT Division, CPCB-HO., Delhi	
7.	The Divisional Head , IPC-VI Division, CPCB-HO., Delhi	


[Prashant Gargava]
Member Secretary

