

Speed Post

B-190197/WQM-II(RG)/CPCB/Sugar/16 /2016-17

30.05.2019
06.06.

To,

M/s Doiwala Sugar Company Ltd.
Doiwala, Dehradun,
Uttarakhand-248140

**DIRECTION UNDER SECTION 5 OF THE ENVIRONMENT (PROTECTION) ACT, 1986 -
NOTICE 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 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 following observations were made;

1. The analysis of treated effluent sample shows pH-7.33 as against norms of 5.5-9.0, BOD-34 mg/l against norms of 30 mg/l, COD- 91 mg/l against norms of 250 mg/l, TSS- 49 mg/l against norms of 30 mg/l and TDS- 860 mg/l against norms of 2100 mg/l which indicates non-compliance w.r.t. BOD & TSS against surface water discharge norms prescribed under Environment (Protection) Rules, 1986.
2. MLSS in aeration tank was 878 mg/l which indicates unstabilised Activated Sludge Process system due to poor operation and maintenance of ETP system and possibility of dilution of ETP system.
3. The Unit does not have separate provision for treatment of effluent from spray pond overflow.

4. Flow meters were installed at bore wells, inlet and outlet of ETP. However, flow meters were not installed at manufacture processes.
5. Treated effluent is discharged into a drain which ultimately meets the Song river.
6. Lagoon was under construction for storage of treated effluent in low demand period of irrigation.
7. The Unit has not submitted irrigation management plan.
8. The Unit has not submitted revalidated ETP adequacy assessment report within 45 days from the date of resumption of operation to CPCB.

AND WHEREAS, CPCB has issued show cause notice dt.10.05.2018 under Section 5 of the Environment (Protection) Act, 1986 to the unit as the unit failed to meet the effluent discharge norms; and

WHEREAS, the Unit submitted the reply of the Show Cause Notice vide letter dt. 05.06.2018 along with the revalidated 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.
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 & 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 & 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 following observations were made;

1. Recommendation of revalidated report prepared by VSI, Pune have been implemented.
2. Flow meters at borewell have been installed and record of consumption of water is being maintained daily.
3. Flow meters at water areas of cold water have been installed.
4. Flow meter for measuring inlet/outlet water flow have already been installed.
5. A logbook has been kept to record the daily water consumption and effluent generation at ETP lab.
6. The unit has done colour coding of pipelines.
7. The unit is having four nos. of sludge drying bed of adequate capacity.

8. Analysis of effluent discharge will be carried out by the ETP Lab installed and logbook for the same will be maintained by the unit.
9. The unit has submitted implementation status of the Charter in the form of Affidavit
10. The unit has not submitted 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 during crushing season.

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

1. The unit has installed flowmeter in borewells, inlet and outlet of ETP
2. The unit has not properly maintained the log books of individual flow meters.
3. The unit has done colour coding of pipelines partially.
4. During inspection, OCEMS was found non-functional.
5. The unit has not installed mechanical sludge handling system.
6. Analysis of treated effluent sample from outlet shows pH-7.36 as 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 surface discharge norms prescribed under Environment (Protection) Rules, 1986 applicable as the unit is discharging the treated effluent in nearby drain (Alla Rakhi Canal).
7. The value of MLSS was found 1693 mg/l and MLVSS was 76 mg/l.
8. As per CPCB lab analysis reports sample of ground water is found non-compliance w.r.t BIS standards of **Fe- 47.05mg/l** as against the norms of 0.3 mg/l.
9. The unit has not complied direction issued to the unit dated 26.10.2018.

It is evident that partially treated effluent is being discharged by the Unit, posing potential threat to surface water quality.

NOW, THEREFORE, in view of the above observations and in exercise of the powers, delegated to the Chairman, CPCB under section 5 of the Environment (Protection) Act, 1986, notice is hereby served to the Unit (M/s Doiwala Sugar Company Ltd., Doiwala, Dehradun, Uttarakhand) to **Show cause, why the Unit should not be closed** down until all the necessary pollution control measure are planned and implemented so as to comply with the prescribed effluent discharge standards notified under Environment (Protection) Act, 1986 to satisfaction of CPCB.

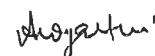
You are hereby given an opportunity to file your objections (if any) to the above proposed direction within 15 days from the date of receipt of this notice, failing which appropriate action will be taken against the Unit without giving any further notice as, in accordance with provision of the Environment (Protection) Act, 1986.



(S. P. SINGH PARIHAR)
CHAIRMAN

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03.06.2019



Copy to:

1. **Cane and Sugar Commissioner
Uttarakhand**
Village Hempur Ismile, Bazpur Road,
Kashipur District, Udham Singh Nagar,
Uttarakhand-244713
 2. **Member Secretary**
Uttarakhand Environment Protection & Pollution
Control Board, 29/20, Nemi Road, Dehradun,
Uttarakhand-248001
 3. **Joint Secretary (CP Division)**
Ministry of Environment, Forest & C.C
Prithvi Block, Indira Paryavaran Bhawan,
Jorbagh Road, New Delhi – 110 003
 4. **Regional Directorate**
Regional Director
Central Pollution Control Board, PICUP Bhawan,
Ground Floor, Vibhuti Khand, Gomti Nagar,
Lucknow – 226 010
 5. In-charge, IT Division, CPCB
 6. Master file/Guard file WQM II, CPCB Delhi
- : With request to ensure compliance of the directions.
- : For kind information, please.
- : For kind information, please.
- : For follow up and ensuring compliance
- : with request to upload on CPCB server.


(Prashant Gargava)
MEMBER SECRETARY

