



केन्द्रीय प्रदूषण नियंत्रण बोर्ड
CENTRAL POLLUTION CONTROL BOARD
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय भारत सरकार
MINISTRY OF ENVIRONMENT FOREST & CLIMATE CHANGE GOVT OF INDIA

SPEED POST

CP-11/23/2023-IPC-III-HO-CPCB-HO 3269

14.08.2023

To,

M/s Shree Narmada Khand Udhog Sahkari Mandli Ltd.,
Dhrikheda P.O. Timbi, Ta-Rajpipla(Nadod),
District- Narmada-Gujarat-393140

**SHOW CAUSE NOTICE UNDER SECTION 5 OF THE ENVIRONMENT
(PROTECTION) ACT, 1986**

WHEREAS, Distilleries 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/emission of environmental pollutants from various categories of industries under the Environment (Protection) Act,1986 and the rules framed there under; and

WHEREAS, it is obligatory on the part of industries to install effluent treatment plants (ETPs) and air pollution control devices (APCDs) to comply with the effluent discharge and emission standards as notified under the Environment (Protection) Act, 1986 and the Rules framed there under and also to meet the consent conditions granted by State Pollution Control Board (SPCBs)/ Pollution Control Committees (PCCs); and

WHEREAS, Central Pollution Control Board carried out the inspection of M/s Shree Narmada Khand Udhog Sahkari Mandli Ltd, Sugar & Distillery Unit (hereafter referred to as 'the Unit') on 10.05.2023 under the programme w.r.t SMS alerts/offline status of Online Continuous Effluent/Emission Monitoring System (OCEMS). The major observations made by the inspection team during the visit are as follows:

1. The industry is having a sugar unit and a distillery unit within the same premises at separate location and has common CC&A from Gujarat Pollution Control Board (GPCB).
2. The Sugar Plant is non-operational due to off season since 02.04.2023.
3. The OCEMS system was found non-functional at the time of visit, since shutting down of sugar plant, as informed. The online data was not available in RTDMS. However, unit showed the online data on DNP Glens server (Service Provider). Historical data can be retrieved from November, 2022 to March 2023 on service provider but not on CPCB RTDMS portal.

'परिवेश भवन' पर्वी अर्जुन नगर, दिल्ली-110032

Parivesh Bhawan, East Arjun Nagar, Delhi-110032

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

4. The industry has not provided documentary evidence for permission to withdraw groundwater.
5. ETP was non-operational as sugar plant was non-operational. However, residual wastewater was observed in aeration tank of ETP.
6. Flow-meter was installed at the outlet of ETP. However, data of the flow is transmitted only to the DNS server.
7. A dried patch of land is observed near ETP which was apparently having previous discharge from ETP. Treated wastewater was also observed accumulated in an earthen pit near secondary clarifier.
8. The contaminated containers were observed kept alongside the internal roads in open space. Bags of solid waste, glass wool, asbestos containing materials, oil barrels are stored openly near approaching roads in sugar plant.
9. Compost, fly-ash and press mud are kept in open which is causing fugitive emission of dust.
10. As informed, generated solid waste is either reused or sold by the industry. However, large amount of mixed solid waste was observed inside the premises along internal roads.
11. All the three sludge drying beds were fully filled with ETP sludge.
12. Boilers ashes were stored in many places on outside boundary wall of spent wash lagoons.
13. The unit is under expansion but their spent-wash storage lagoons observed full.
14. The unit was having four boilers of capacity 35 TPH (02 nos), 60 TPH (01 nos) and 20 TPH (01 nos). Only one boiler of 20TPH was operational during visit and steam generated is used in distillery & captive power generation. The emission monitoring was carried out for 20 TPH boiler. The monitoring results are given below:

Name	PM (mg/Nm ³)	SO ₂ (ppm)	NO _x (ppm)
20 TPH Boiler	182	60.1	54.3
GPCB prescribed standard	150	100	50

From monitoring results, it is observed that boiler was not meeting prescribed standard for particulate matter (PM) and NO_x emission standards.

15. The distillery unit has installed bio-digester, MEE, spray dryer, bio-compost yard to achieve ZLD.
16. Since the spent-wash lagoon was near compost yard, it was observed that spent wash lagoon was almost overflowing and two earthen pits were receiving the spent wash as well as leachate from compost yard.
17. No cameras were installed and connected with CPCB server, as per requirement of ZLD units.

WHEREAS, it is evident that the unit is violating the norms/consent order issued by GPCB with respect to Emission norms of **PM (182 mg/Nm³)** against 150 mg/Nm³ & **NO_x (54.3 mg/Nm³)** against 50mg/Nm³. Also the

unit has made provision for storage of spent-wash in earthen pits, which were observed over flowing. The distillery plant also requires to install PTZ cameras, being a ZLD unit, at relevant locations and its connectivity to CPCB and GPCB server; and

WHEREAS, the Ministry of Environment, Forest, & Climate Change, 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 other standards and norms; and

NOW, THEREFORE, in view of the observations, as described above and exercising the powers delegated to the Chairman, Central Pollution Control Board (CPCB) under section 5 of the Environment (Protection) Act, 1986, notice is hereby served to the unit [**M/s Shree Narmada Khand Udhog Sahkari Mandli Ltd**, Dhrikheda P.O. Timbi, Ta-Rajpipla(Nadod), District-Narmada, Gujarat], to show cause why all the manufacturing operations of the unit should not be closed down till it complies with the following pollution control measures along with terms & conditions of the consent order:

1. To carry out the adequacy assessment of the Air Pollution Control Devices (APCD) with reputed Govt. institution like IITs/NITs/ NSI/ VSI etc. to confirm the adequacy of installed APCD devices and submit the adequacy assessment report within 45 days to CPCB and GPCB.
2. The concentrated spent-wash shall be stored in an impervious and lined lagoon of 30 days storage capacity, constructed for bio-composting purpose and no spillage should occur out of the lined lagoon. The lagoon shall be duly lined with 250 micron HDPE sheet and pitched by stone/brick with cement mortar to prevent leachate.
3. To submit a time bound action plan for dismantling of unlined/earthen lagoon (s) in a scientific manner to CPCB and GPCB. The sludge and effluent shall be disposed of scientifically and complete sludge and effluent disposal report along with documentary evidence shall be submitted to CPCB and GPCB.
4. To install PTZ cameras with night vision at relevant location of bio-compost yard, final spent-wash storage lagoon and provide its connectivity to CPCB & GPCB server.
5. To ensure construction of concrete floor all around Bio-composting yard with provision of garland drain & collection sump and collected effluent shall be lifted using pump as and when required to avoid any contamination in surrounding areas.
6. To install at least three number (one at upstream of groundwater flow direction) of piezometers around spent-wash storage lagoon.

7. To improve housekeeping in and around compost yard and proper storage of fly-ash. Housekeeping should be improved all around sugar plant in terms of contaminated drum storage, solid waste management and littering of effluent/ spent-wash.
8. To ensure proper maintenance of OCEMS (for sugar mill) and data transmission to CPCB for applicable parameters during operational period.
9. To obtain permission for the abstraction of groundwater from the concerned groundwater Authority and shall maintain logbook for groundwater consumption as well as for use in different processes.
10. To install environmental display board at the main gate adjacent to highway apart from sugar unit gate and maintain information /data in the display board.

You are hereby given an opportunity to file your objections (if any) to the above proposed direction within 15 days from the receipt of this notice, failing which it will be presumed that you have nothing to say and appropriate action, in accordance with the provisions of the Environment (Protection) Act, 1986, will be taken against the Unit without giving any further notice.

M.T.C
13/14/8/23
(TANMAY KUMAR)
CHAIRMAN

Copy to:

- | | |
|--|--|
| 1. The Chairman,
Gujarat Pollution Control Board,
Paryavaran Bhavan,
Sector-10A, Gandhi Nagar-382 010,
Gujarat | For information & ensuring
compliance of direction
please. |
| 2. The Director, (CP Division),
Ministry of Environment, Forests & CC
Prithvi Block, Indira Paryavaran
Bhawan, Jorbagh Road,
New Delhi - 110 003 | For information please |
| 3. The Regional Director,
Regional Directorate- Vadodara
Parivesh Bhawan, Opp. Ward No. 10 VMC
Office Subhanpura, Vadodara- 390 023 | For follow-up and ensuring
compliance please |
| 4. The Div. Head, IT Division, CPCB Delhi | For uploading in the website
please |


(BHARAT KUMAR SHARMA)
MEMBER SECRETARY

