

**Speed Post /Email**

CP/39/2024-IPC-I-HO-CPCB-HO 1771

May 21, 2024

M/s Sun Pharma Laboratories Limited,  
Unit-II, Address: Plot no. 107/108,  
Namli Block, P.O. Ranipool, Gangtok,  
East Sikkim-737135

**Sub.: Directions under Section 5 of the Environment (Protection) Act, 1986 -regarding**

WHEREAS, Pharmaceutical industries 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 thereunder; and

WHEREAS, there is need to promote self-regulation and self-promotion 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, a direction under section 18(1)(b) of the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981 was issued on February, 05, 2014 to all the State Pollution Control Boards (SPCBs) / Pollution Control Committee (PCCs) to ensure installation of online emission monitoring system and online effluent monitoring system in pharmaceutical industries; and

WHEREAS, Pharmaceutical unit, M/s Sun Pharma Laboratories Limited, Unit-II, Plot no. 107/108, Namli Block, P.O. Ranipool, Gangtok, East Sikkim-737135 (herein after referred to as the Unit) was randomly selected for inspection under SMS alert programme based on OCEMS installed at the unit; and

WHEREAS, the Unit was inspected by a team of official(s) from the CPCB Regional Directorate, Shillong on February 28, 2024 to verify the status and compliance of OCEMS installed at the facility and had collected grab samples from various sections of ETP, and observed the following shortcomings/non-compliance:

1. The display board regarding information on air pollution, waste water generation and hazardous waste etc. was found inside the premises of the Unit and not at the entrance gate (as per Hon'ble Supreme Court order in WP 657/1995).
2. The location and specification of OCEMS analyzers (effluent) is not as per CPCB guidelines.
3. The analysis results of treated effluent at the ETP outlet w.r.t Oil and Grease is exceeding the prescribed limits (17.41 mg/l > 10mg/l).
4. The treated ETP effluent is being used for toilet flushing in the name of ZLD, which is violation of zero liquid discharge(ZLD) condition. The Unit has not maintained ZLD condition as per consent to operate issued by Sikkim Pollution Control Board.

5. The Unit hazardous waste authorization for disposal of hazardous waste is expired since 31.03.2024 and has not maintained records of Form-3 as per the Hazardous and other wastes (Management and Transboundary Movement) Rules, 2016.
6. The Unit has not provided permanent storage facility for management of hazardous waste.

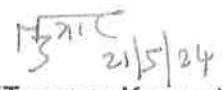
WHEREAS, the Ministry of Environment, Forest and Climate Change, Government of India, vide Notifications No. S.O. 157(E) of 27.02.1996 and S.O. 730(E) dated 10.07.2002, has delegated the powers vested under Section 5 of the Environment (Protection) Act, 1986 (29 of 1986) to the Chairman, Central Pollution 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

NOW, THEREFORE, in exercise of powers vested under Section 5 of the Environment (Protection) Act, 1986, the Unit is hereby directed to comply within 30 days of receipt of the following directions:

1. The unit shall ensure proper operation of Effluent Treatment Plant, so, as to comply with prescribed standards for reuse of treated effluent as notified by MoEF&CC vide dated 6th August, 2021.
2. The Unit shall not use treated ETP effluent for domestic purposes as it contains COD of pharmaceutical industry which may affect the environment.
3. The Unit shall reuse the treated effluent in the process and maintain zero liquid discharge status as per the consent to operate issued by Sikkim Pollution Control Board.
4. The location and specification of OCEMS analyzers (effluent) should be as per CPCB guidelines.
5. The Unit shall operate with valid hazardous waste authorization from Sikkim PCB for disposal of hazardous waste.
6. The Unit shall provide designated storage area for storage of hazardous waste and shall maintain records of the hazardous waste as per the Hazardous & Other Wastes (M & T M) Rules 2016.
7. The Unit shall provide Display Board at the entrance gate with the updated information on air pollution, waste water generation and hazardous waste etc. (as per Hon'ble Supreme Court order in WP 657/1995).

Action taken in compliance of the above be submitted to CPCB within 30 days of issuance of this direction.

In case of failure to comply with the said directions necessary action as deemed fit under the provision of the Environment (Protection) Act, 1986 will be taken by CPCB.

  
(Tanmay Kumar)

Chairman



**Copy to:**

1. The Chairman  
Sikkim State Pollution Control Board  
Department of Forest, Environment & Wildlife Management  
Government of Sikkim, Deorali, Gangtok, -737102
2. The Additional Secretary (CP Division)  
Ministry of Environment, Forests and Climate Change  
Prithvi Wing, 5 th Floor,  
Indira Paryavaran Bhawan, Aliganj,  
Jor Bagh Road, New Delhi – 110003
3. The Regional Director  
Regional Directorate Shillong  
Central Pollution Control Board  
TUM-SIR" Lower Motinagar  
Near Fire Brigade H.Q.,  
Shillong - 793 014
- ✓ 4. Divisional Head, IT Division, CPCB
5. Divisional Head, IPC-VI Division, CPCB



**(Bharat Kumar Sharma)**

**Member Secretary**