



**SPEED POST**

File No.: CP-11/4/2024-IPC-IV-HO-CPCB-HO/2656

Date: 27/6/2024

To

M/s Pooja Tannofix Tanners Private Limited  
Plot No. 2445 M.I.E., Part-A, Bahadurgarh,  
District- Jhajjar, HARYANA-124507

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

**WHEREAS**, Tannery industries are identified as one of the Grossly Polluting industries (GPIs) 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 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**, 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 thereunder and also to meet the consent conditions granted by State Pollution Control Boards (SPCBs)/ Pollution Control Committees (PCCs); 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**, M/s Pooja Tannofix Tanners Private Limited, Bahadurgarh, Jhajjar, Haryana (here in after referred as 'the Unit') is engaged in the processing of wet blue to produce finished leather; and

**‘परिवेश भवन’ पर्वी अर्जुन नगर, दिल्ली-110032**

Parivesh Bhawan, East Arjun Nagar, Delhi-110032

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

**WHEREAS**, the Unit was inspected by officials from CPCB on 06.12.2023 under “Environmental surveillance of 17 category of high pollution potential industries and common facility, based on OCEMS data programme”. The major observations and findings from the inspection report are as follows:

1. The Unit and Effluent Treatment Plant (hereinafter referred as “ETP”) were found operational during inspection.
2. The Unit has valid consents and authorization from Haryana State Pollution Control Board (hereinafter referred as “HSPCB”) having validity of each, up to 30.09.2026.
3. As per the consents, the Unit is permitted to process ‘1500 pieces of wet blue skins to finished leather per day’ through washing neutralization dyeing & fat liquoring and milling process. However, on the day of inspection, the actual production was reported as ‘800 pieces of skins per day’.
4. Dyeing & fat liquoring and milling operations were carried out, on the day of inspection.
5. The Unit has installed ETP of 50 m<sup>3</sup>/day capacity based on physico-chemical followed by biological and tertiary treatment. The treatment Scheme installed is as follows:  
“Bar Screen Chamber --> Oil Grease Chamber --> Equalization cum Collection Tank -> Flash Mixer (Chemical Reaction Tank) --> Primary Tube Settler --> Aeration tank -> Secondary Tube settler --> Clear Water Collection Tank --> Multi grade Sand Filter --> Activated Carbon Filter --> Ultra-Filtration (UF of capacity 4 m<sup>3</sup>/hr) --> Reverse Osmosis (4 m<sup>3</sup>/hr capacity) --> Plate & Frame Filter Press (02)”
6. The analysis of ETP inlet sample taken during the inspection showed pH-6.4, TSS- 264 mg/l, TDS- 3676 mg/l, COD- 1940 mg/l, BOD- 573 mg/l.
7. The analysis of ETP outlet sample taken during the inspection showed pH-7.8, TSS- 27 mg/l, TDS- 1946 mg/l, COD- 149 mg/l, BOD- 17 mg/l, Total Chromium- BDL, Hexavalent Chromium -BDL, Sulphide- 2.4 mg/l and Oil & Grease- BDL. **The Unit is non-complying with the prescribed effluent norms w.r.t ‘Sulphide’ (2.4 mg/l against 2.0 mg/l).**
8. The value of **MLSS and MLVSS was found to be very low i.e., 109 mg/l and 58 mg/l**, which indicate poor operation & maintenance of aeration tank of ETP. In spite of such low MLSS and MLVSS in aeration tank, the analysis result of ETP inlet and outlet samples showed about 97%, 92% and 47% reduction in BOD, COD and TDS respectively which is technically not feasible, hence **possibility of dilution in ETP before final outlet can’t be ruled out.**
9. The Unit has installed On-line Continuous Effluent Monitoring System (OCEMS) at final outlet of ETP for measuring flow, pH, TSS, BOD, COD parameters and the same is connected with the CPCB server.
10. During visit the OCEMS values against the monitored values i.e., pH-8.20 (against 7.8), TSS 34.69 mg/l (against 27 mg/l), BOD-15.51 mg/l (against 17 mg/l), COD-70.52 mg/l (against 149 mg/l) were observed at the time of sampling. **The OCEMS values have significant variation in comparison to lab analysis results** of samples taken during inspection. The COD value showed negative variation of 111.3 % .

11. As informed R.O. reject water is reused in house toilet flushing, floor washing. On the day of visit, no effluent was being discharge into outside of the premise. **The Unit has not installed any flow measuring device at recycle point of the ETP treated water.**
12. The Unit has installed separate energy meter for ETP and has maintained its records.
13. The Unit has not maintained the records of the shaving dust stored and sold.
14. The Unit has provided environmental display board at the entrance.

**It is evident from above, that the Unit is non-complying w.r.t. the notified discharge norms, observed dilution in ETP and improper operation of ETP resulting in discharge of partially treated effluent into the environment.**

**AND NOW, THEREFORE,** based on the above observations and in exercise of the powers, delegated to the Chairman, CPCB under section 5 of the Environment (Protection) Act, 1986, the Unit, **M/s Pooja Tannofix Tanners Private Limited, Bahadurgarh, Jhajjar, Haryana** is hereby directed **to show cause as to why the Unit should not be closed down** till the compliance of following:

1. The Unit shall immediately stop the practice of dilution in ETP and ensure compliance of notified discharge norms at all time.
2. The Unit shall improve the operation and maintenance of the existing ETP so as to achieve desired level biomass in the aeration tank.
3. The Unit shall ensure regular maintenance, operation & calibration of the on-line system (OCEMS) so as to obtain continuous reliable accurate results and provide the copy of recent calibration certificate to CPCB.
4. The Unit shall ensure uninterrupted data connectivity of OCEMS with CPCB/HSPCB server. Any failure in this regard shall be rectified at the earliest.
5. The Unit shall install electromagnetic flow measuring system at recycle/ reuse point of the ETP treated water and shall maintain the records of the same.
6. The Unit shall maintain the records of shaving dust stored and sold.

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

  
(TANMAY KUMAR)  
CHAIRMAN

**Copy to:**

1. **Chairman,**  
**Haryana State Pollution Control Board**  
C-11, Sector-6, Panchkula,  
Haryana 134109
  2. **Additional Secretary (CP Division),**  
**Ministry of Environment, Forest & CC,**  
Prithvi Block, Indira Paryavaran Bhawan,  
Jorbagh Road, New Delhi – 110003
  3. **Regional Directorate**  
**Central Pollution Control Board,**  
BSNL Tel Exchange, 2nd Floor,  
Sector 49 C, Chandigarh- 160047
  4. **Divisional Head,**  
**IT Division, CPCB, Delhi**
  5. **Divisional Head,**  
**IPC-VI, CPCB, Delhi**
  6. **Divisional Head,**  
**WQM-II, CPCB, Delhi**
- : For kind information, please
- : For kind information, please
- : With the request to follow up  
& ensure compliance of the  
directions.
- : With the request to upload the  
Directions on CPCB website.
- : For kind information and  
updatation, please.
- : For kind information, please.

  
(BHARAT KUMAR SHARMA)  
MEMBER SECRETARY