



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

BY REGISTERED AD

CP-11/63/2023-IPC-III-HO-CPCB-HO

Sept 18 2024

To,

M/s MVK Agro Food Product Ltd;
(Formerly known as M/s Shankar S.S.K Ltd),
Kusumnager, Waghalwada,
Tq.Umri, Dist Nanded,
Maharashtra-431807

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

WHEREAS, Sugar 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 there under; 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 there under and also to meet the consent conditions granted by State Pollution Control Board (SPCBs) / Pollution Control Committees (PCCs); and

WHEREAS, M/s MVK Agro Food Product Ltd (Formerly known as M/s Shankar S.S.K Ltd) (Hereinafter referred as "the Unit") is engaged in the production of Sugar with consented capacity of 7500 MT/Month.

WHEREAS, CPCB issued closure direction dated 22.03.2016 under section 5 of E(P) Act, 1986 to the Unit due to non-installation and connectivity of OCEMS with CPCB server and directed the Unit to not to undertake any manufacturing operations till installation and commissioning of online continuous effluent monitoring system (OCEMS) and providing connectivity of data to CPCB/SPCB server, and to submit compliance to CPCB within 15 days on the receipt of the direction; and

WHEREAS, the Unit responded to the above said closure direction, submitted the required documents and informed to have complied with the

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Parivesh Bhawan, East Arjun Nagar, Delhi-110032

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directions regarding installation & connectivity of OCEMS and the same was verified by CPCB. The three-member Committee reviewed the compliance made by the Unit and recommended that the Unit may be allowed to resume its manufacturing operations subject to certain conditions; and

WHEREAS, CPCB issued revocation direction vide its letter dated 02.01.2024 to the Unit under section 5 of the E(P)Act, 1986 with the following conditions:

1. The Unit shall be permitted to operate for three months from the date of commencement of operation.
2. The Unit shall submit the valid Consents under the Water Act & Air Act, and Authorization under Hazardous & other Waste Rules, 2016 issued by MPCB and shall not operate without valid Consents.
3. The Unit shall ensure uninterrupted data connectivity of OCEMS with CPCB server after commencement of operation of the plant.
4. The Unit shall ensure periodic calibration of the analyzers as per Standard Operating Procedure/recommendations of the supplier and submit the calibration results.
5. The Unit shall intimate the date of resumption of manufacturing operation to CPCB.
6. The Unit shall submit RT-8c form for the crushing season 2016-17 to 2022-23 within 60 days.

WHEREAS, the inspection of the said Unit was carried out on 20.03.2024 by the team of CPCB for compliance verification w.r.t CPCB's revocation direction dated 02.01.2024 and observed the following non-compliances:

- i. During inspection, the Unit was not in operation. It has been observed that the Unit started its manufacturing operations on 05.11.2023 before grant of revocation direction. The RT-8C (for 2016-17 to 2023-24) indicates that the Unit has operated the industry during the closure direction dated 22.03.2016 also.
- ii. The Unit has not installed Condensate Polishing Unit (CPU) for recycle/reuse of treated effluent in compliance to consent condition at S. No. 1 (B) of Schedule-I (i.e. Terms & conditions for compliance of water pollution control) of the CTO (Consent to Operate) dated 08.10.2023.
- iii. Due to breakage in effluent conveyance pipeline leading to collection chamber of ETP, untreated effluent was found overflowed/spread near the collection chamber of ETP, and ultimately finding its way into low lying area located within the premises.
- iv. The Unit has provided an underground bypass pipeline near the ETP area, in which apparently untreated effluent is being discharged into low lying area located within the Unit premises.

- v. The team collected grab samples from (i) inlet of ETP (i.e. from equalization tank); (ii) final outlet of ETP (i.e. from outlet of activated carbon filter) (iii) from underground bypass pipeline near the ETP area. The lab analysis results shows that all the monitored parameters are within the MPCB prescribed discharge standards.
- vi. The lab analysis result shows reduction of COD (from 47200 mg/l to 124 mg/l) & BOD (16000 mg/l to 48 mg/l) i.e. more than 99% efficiency and the same may not be possible with the existing treatment system. Further, such high reduction of BOD, COD and TDS (from 4,022 mg/l to 1,204 mg/l) indicates the possibility of dilution of the effluent with freshwater.

WHEREAS, it is evident from the above observations that the Unit has made a provision for bypassing of effluent in the low lying area located within the premises, Unit has not installed the Condensate Polishing Unit (CPU) as per CTO condition, more than 99% reduction of BOD & COD with conventional treatment system indicates possible dilution of effluent with freshwater and also operated the Unit before CPCB's revocation direction; 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

NOW, therefore, in view of the above, and exercising the powers delegated to the Chairman, Central Pollution Control Board (CPCB) under section 5 of the Environment (Protection) Act, 1986, the Unit **[M/s MVK Agro Food Product Ltd. (Formerly known as M/s Shankar S.S.K Ltd), Kusumnager, Waghawada, Tq.Umri, Dist Nanded, Maharashtra-431807]** is **hereby directed to show cause as to why action against the Unit should not be initiated including imposition of environmental compensation for observed non-compliances and closure of the manufacturing operations till compliance of the following:**

1. Discharge of effluent in the low lying area be stopped and underground pipeline provided near the ETP shall be dismantled and also ensure periodic maintenance of the effluent conveyance system & associated infrastructure facility.
2. Commissioning of new CPU (condensate polishing unit) for recycle/reuse of treated effluent in compliance to consent conditions stipulated at Schedule-I; S. no. 1 (B) of the CTO.
3. Oil skimmer installed at the inlet of ETP shall be rectified and also ensure its proper operation.

4. Submission of Groundwater monitoring report of the Unit and surrounding area from E(P)A/NABL approved /recognized lab so as to ascertain the groundwater quality of the area, to MPCB and also to CPCB.

The Unit is hereby given an opportunity to file their objections (duly notarized) to the above proposed directions and submit a time bound action plan for compliance of above directions along with documentary evidences within 15 days of receipt of this notice, failing which it will be presumed that you have nothing to say and appropriate action will be taken, in accordance with the provisions of the Environment (Protection) Act, 1986, without giving any further notice.


(TANMAY KUMAR)
CHAIRMAN

Copy to:

1. **The Member Secretary,** : For ensuring compliance
Maharashtra Pollution Control Board of directions please.
2nd, 3rd & 4th Floor,
Opp. Cine Planet, Near Sion Circle,
Sion (E), Mumbai- 400022
2. **The Regional Director,** : For follow up and
Regional Directorate ensuring compliance of
Central Pollution Control Board, the direction.
Survey No. 110, Dhankude Multi
Purpose Hall, Baner Road, Baner, Pune -
411045
3. **The Director, (CP Division),** : For information, pl.
Ministry of Environment, Forests & CC,
Prithvi Block, Indira
Paryavaran Bhawan, Jorbagh Road, New
Delhi - 110 003
4. **The Div. Head, IT Division, CPCB:** To upload direction at
Delhi CPCB Website, pl.
5. **The Div. Head, IPC-VI, Division, CPCB:** For information, pl.
Delhi


(BHARAT KUMAR SHARMA)
MEMBER SECRETARY

