

**BY SPEED POST**

CP/24/2024-IPC-I-HO-CPCB-HO 8812

Date: 31.01.2025

To

M/s Ambey Laboratories Pvt Ltd,  
SP 1-5, RIICO Industrial Area,  
Sotanala, Tehsil Behror,  
District Kotputli-Behror,  
Rajasthan - 301701

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

WHEREAS, Pesticide / Herbicide units 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, in order to investigate the repeated complaints received at Central Pollution Control Board (CPCB) against M/s Ambey Laboratories Pvt Ltd, SP 1-5, RIICO Industrial Area, Sotanala, Tehsil Behror, District Kotputli-Behror, Rajasthan (hereinafter called the unit), the officials from CPCB inspected the unit on 19.12.2024; and

WHEREAS, the unit has been granted Consent to Operate (CTO) for manufacturing of 3085 TPA of different grades of 2,4-D Herbicide products and was operational during the inspection; and

WHEREAS, the inspecting team observed the following violations:

1. As per the CTO, fresh water requirement is 17.3 KLD and stipulated source of water is RIICO water supply connection (9.3 KLD) and ground water (8 KLD) from borewell. The unit abstracts ground water for its production activities, however the unit failed to provide the copy of approval from Central Ground Water Authority for abstraction of ground water, which is mandated as per condition no. 13 of CTO.
2. The unit does not maintain records of fresh water consumption, effluent generation, effluent treatment and re use of treated effluent.
3. As per the condition no. 17 of the CTO, the unit is required to maintain zero liquid discharge (ZLD). However, the unit was observed to have provided arrangements for bypassing effluent using pipelines through its front boundary wall to the drain adjacent to the unit. It was observed that 02 no. of points of effluent bypass were located in extreme vicinity to GPS coordinates (Lat 27.831427°, Long 76.265673°) on the

aforementioned boundary wall. During visit, it was also observed that effluent was dripping from one of the above said pipelines into the drain adjacent to the unit. The inspection team collected the samples of bypassed effluent. Analysis results show the quality of bypassed effluent was highly acidic having pH (0.7), COD (25518 mg/l) and 246.91 mg/l of 2,4 Dichlorophenol which is produced by the unit as a precursor compound for the synthesis of final products. Analysis results of the sample of sediment collected from the drain, to which effluent was being bypassed, show concentration of 32160 mg/Kg of 2,4 Dichlorophenol; which confirms that the unit bypasses its untreated effluent.

4. It was observed that the Effluent Treatment Plant (ETP) and Multi Effect Evaporator (MEE) of the unit were not operational during visit, except aeration tank of ETP. Analysis results of the samples collected from the finally treated effluent storage tank show that the treated effluent is not adequate to be used in cooling tower because of high TDS (7808 mg/l) and COD (1789 mg/l).
5. The unit was observed storing semi-finished product (2,4 -D slurry) in plastic sacks in open area and also not having impervious flooring. The semi-finished product (2,4 -D slurry) was observed leaking out from some of the sacks.
6. Analysis results from the groundwater samples collected from the borewell situated about 30 metres from the process area within the premises of the unit show the concentration of parameters viz. COD (120 mg/l), TDS (7560 mg/l), Chlorides (5192 mg/l), Phenolic Compounds (11.15 mg/l) and 2, 4 - Dichlorophenol (4.7 mg/l). The presence of phenolic compounds and 2, 4 - Dichlorophenol indicates contamination of groundwater due to improper storage & management practices of effluent or hazardous chemicals/ wastes or both.
7. The unit has not provided proper platform and approach ladder as per the Emission Regulation – Part III published by CPCB for conducting monitoring of process emissions at the common stack of the reactors.
8. The unit has not provided platform of adequate dimensions at the stack of boiler for conducting source emission monitoring as per the Emission Regulations Part – III published by CPCB.
9. The unit has provided a covered storage area for storing ETP sludge and other hazardous wastes. The floor of storage area was observed to be damaged. No slope/drainage and leachate collection system was observed in the hazardous waste storage area.
10. The unit has provided online flow meter and web camera as Online Continuous Effluent Monitoring System. However, the online flow meter was observed switched off during visit. It is also confirmed from the report dated 24.01.2025 of IT Division, CPCB, that the last data of online flow meter is received at CPCB portal is on 15.05.2024 and live streaming of web camera is not available at CPCB portal.
11. Apart from herbicide production facility, the unit has also provided facility for manufacturing of floor cleaner which used hazardous chemical (2,4, Dichloro Phenol) as raw material and Toilet cleaner using Hydrochloric acid. During visit, the production of toilet cleaner and floor cleaner was not observed being done. However, the overall condition of the production facility and the presence of such packaged product items indicate that the unit is indulged in production of floor cleaner and toilet cleaner for which no CTO has been obtained.

12. The unit sells spent hydrochloric acid which is generated during the process of chlorination of phenol and also generated by scrubbing of process emissions. The aforementioned hydrochloric acid generated during process / scrubbing of process emissions falls under the category of hazardous wastes as per waste category specified at S.Nos. 29.6 and 35.1 respectively under Schedule I of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016. However, the consolidated consent to operate under the Air & Water Act and the authorization under Hazardous Waste Management Rules, 2016, granted to the unit do not state that hazardous waste i.e. spent hydrochloric acid is by-product or authorized for sale.
13. The unit could not provide any documentary evidence regarding disposal of hazardous waste i.e. spent solvent which is to be disposed at M/s. Continental Petroleum, Behror as stipulated in the authorization issued by Rajasthan State Pollution Control Board under Hazardous Waste Management Rules, 2016.
14. The unit failed to produce quarterly monitoring reports of effluent, emissions and groundwater as per condition no. 44 stipulated in consent to operate.
15. The unit was observed storing about 30.6 Tons of Chlorine gas (34 cylinders of 900 Kg each). However, the unit could not produce onsite emergency plan and safety audit report in compliance of Manufacture, Storage and Import of Hazardous Chemical Rules, 1989
16. The unit has provided display board showing effluent, emissions and hazardous wastes data, however it was found to be not updated.
17. The unit representative verbally informed that the unit has a valid policy under Public Liability Insurance Act, however, the unit failed to produce copy of the policy.

WHEREAS, it was observed that the quality of bypassed effluent which are highly acidic having pH (0.7) and having concentration of COD (25518 mg/l) and 246.91 mg/l of 2,4 Dichlorophenol which is produced by the unit as a precursor compound for the synthesis of final products. Analysis results show that the sample of sediment collected from the drain to which effluent was being bypassed was having concentration of 32160 mg/Kg of 2,4 Dichlorophenol; which confirms that the unit practices bypassing of untreated effluent; and

WHEREAS, unauthorized discharge / bypassing of trade effluent, and improper storage of hazardous wastes / chemicals is likely to cause grave injury to the environment; and

WHEREAS, grave injury to the environment is evident from the fact that from the analysis results of the groundwater within the premises of the unit, the groundwater is observed highly contaminated since the observed concentration of parameters in groundwater sample viz., TDS (7560 mg/l), Phenolic Compounds (11.15 mg/l) and Chlorides (5192 mg/l) is remarkably exceeding w.r.t. maximum permissible limit for drinking water prescribed by Bureau of Indian Standards i.e. Phenolic Compounds (0.002 mg/l), TDS (2000 mg/l) and Chlorides (1000 mg/l). Further, concentration of 4.7 mg/l of 2, 4 – Dichlorophenol in groundwater indicates contamination of groundwater by improper storage and management practices of effluent or hazardous chemicals/wastes by the unit; 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.

NOW, THEREFORE, in exercise of powers vested to Chairman CPCB under Section 5 of the Environment (Protection) Act, 1986, following directions are issued to M/s Ambey Laboratories Pvt Ltd, SP 1-5, RIICO Industrial Area, Sotanala, Tehsil Behror, District Kotputli-Behror, Rajasthan (the unit):

1. The Unit shall immediately close its operations and shall not resume its operations till control/remedial measures on above observation are made, environmental norms are complied with and written permission to operate is obtained from Central Pollution Control Board.
2. The unit shall not abstract groundwater from its borewell or any other groundwater abstraction source till it takes approval from Central Ground Water Authority for abstraction of ground water.
3. The unit shall dismantle all the existing arrangements for bypassing of effluent. The unit shall remove all flexible pipelines. The silt containing hazardous constituents shall be immediately removed from the drain and disposed to TSDF in an environmentally safe manner under overall supervision of Rajasthan SPCB and records (quantity, manifest system, etc.) be maintained in this regard.
4. The unit shall take necessary steps to enhance the efficiency of its effluent treatment plant (including MEE) and shall submit a report from a Government Institution having relevant expertise regarding adequacy of its overall effluent treatment system in terms of treatment efficiency and capability to achieve Zero Liquid Discharge including minimal effluent quality fit for using in cooling tower.
5. The unit shall ensure Zero Liquid Discharge compliance.
6. The unit shall install required platform and approach ladder as prescribed under Emission Regulations Part – III published by CPCB to facilitate safe monitoring of process emissions at the common stack of the reactors and the boiler stack.
7. The unit shall ensure that semi-finished products and other chemicals stored in sacks are stored in a designated covered area having impervious flooring and slope/drainage and leachate collection system.
8. The unit shall provide above ground storage tanks for all the sub-units of ETP, mother liquor storage / storage of any other process effluent and from adequate height above the ground surface such that any leakage may be clearly & visibly detected and managed.
9. The unit shall ensure proper hazardous waste storage area by repairing the damaged flooring and providing an adequate slope/ drainage and leachate collection system.
10. The unit shall ensure the continuous operation of the online flow meter and PTZ web camera with real time online data ensuring continuous connectivity to CPCB.
11. The unit shall ensure that no product is produced that is not permitted in its Consent to Operate.

12. The unit shall execute sale of spent Hydrochloric acid generated during process or from scrubbed emissions only after obtaining authorization from Rajasthan SPCB under Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 for the same.
13. The unit shall maintain the logbook/records along with the documentary evidence for the all the hazardous waste generation and their disposal as per authorization granted under Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.
14. The unit shall ensure that quarterly emission, effluent and groundwater monitoring is conducted and the records are submitted to the SPCB in accordance with the condition no. 44 of CTO.
15. The unit shall ensure compliance with the Manufacture, Storage, and Import of Hazardous Chemicals Rules, 1989, by preparing and maintaining an updated onsite emergency plan and conducting annual safety audit.
16. The unit shall take requisite policy under the Public Liability Insurance Act, 1991.
17. The unit shall provide proper display board showing effluent, emissions and hazardous wastes data, in accordance with Hon'ble Supreme Court of India order in Writ Petition No. 657 of 1995 and be regularly updated.

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

  
**(Amandeep Garg)**  
 Chairman

**Copy to:**

1. The Chairman  
Rajasthan Pollution Control Board,  
4, Jhalana Institutional Area,  
Jhalana Doongri,  
Jaipur, Rajasthan - 302004
2. The Superintending Engineer ( O&M),  
Behror Rural,  
Jaipur Vidyut Vitran Nigam Limited,  
Near BSNL Exchange, Industrial Area,  
Behror- 301701  
Rajasthan

With request to ensure closure of the unit and arrange to immediately submit the scope of work and timeline along with current status regarding detailed site assessment and remedial measures for restoration of quality of land and ground water which has been assigned to National Institute of Hydrology, Roorkee by RSPCB, please.

To immediately disconnect industrial electricity supply of the unit please.

3. The Joint Secretary (CP Division)  
Ministry of Environment, Forests and Climate  
Change, Prithvi Wing, 2nd Floor,  
Room No. 216, Indira Paryavaran Bhawan  
Aliganj, Jor Bagh Road, New Delhi-110003
4. The Regional Director  
Central Pollution Control Board  
Parivesh Bhawan, Paryavaran Parisar,  
E-5, Arera Colony, Bhopal-462016
5. ✓ D.H., IT, CPCB
6. D.H. IPC- VI, CPCB
7. D.H. Law Division, CPCB

  
**(Bharat Kumar Sharma)**  
Member Secretary