BY SPEED POST

CP-11/4/2025-IPC-IV-HO-CPCB-HO/ 326 April 07,2025

To

M/s TMS Leathers
D.A. Edayar, Muppathadam,
Aluva, Kerala - 683110

DIRECTIONS UNDER SECTION 5 OF THE ENVIRONMENT (PROTECTION) ACT, 1986

WHEREAS, Tanneries 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 for various categories of industries under the Environment (Protection) Act, 1986 and rules framed thereunder; 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 Board (SPCBs) / Pollution Control Committees (PCCs); and

WHEREAS, the Ministry of Environment, Forest & Climate Change (MoEF&CC) vide notification no. GSR No. 656(E) dated 10.09.2021 revised the standards for Tannery sector under the Environment (Protection) Act, 1986, which came into force from 01.07.2022. The revised Standards were communicated to all the SPCBs/PCCs by CPCB vide letter dated 15.07.2022 for its implementation; 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 05.02.2014 to all the SPCBs/PCCs for installation of Online Effluent Monitoring System w.r.t. Flow, pH, BOD, COD, and TSS parameters; and

Contd.

WHEREAS, M/s TMS Leathers, D.A. Edayar, Muppathadam, Aluva, Kerala, (hereinafter referred as " the Unit") is a Tannery unit and engaged in processing of "Raw to Wet blue leather" with a consented capacity of 800 hides/day. On the day of inspection, the unit was found processing 300 hides; and

WHEREAS, the unit (M/s TMS Leather) located at D.A., Edayar, Muppathadam, Aluva, Kerala was inspected by the officials from Central Pollution Control Board (CPCB) on 06.10.2024 under 'Environmental surveillance of 17 categories of highly pollution potential industries and common facilities' based on real-time OCEMS (Online Continuous Effluent Monitoring System) data programme. The major observations made by the inspecting team are as follows:

1. The Unit was found operational on the day of inspection.
2. The Unit was granted integrated Consent to Operate (CTO) under the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981 and the Environment (Protection) Act,1986 by Kerala State Pollution Control Board (KSPCB) on 01.09.2023, with validity up to 30.06.2028. However, KSPCB has not revised the integrated CTO in view of the revised standards for tannery sector notified vide notification no. G.S.R. 656(E) dated 10.09.2021, under the Environment (Protestation) Act, 1986.
3. The Unit has not made available required details/ documents to the inspecting team such as ETP (Effluent Treatment Plant) details, Water Balance, OCEMS calibration record, third party inspection report, ground water monitoring report, accidental damage coverage under public liability act. etc.
4. The Unit has installed ETP based on activated sludge process and consists of collection, equalization, primary settling, aeration, secondary settling tanks and delay pond. The treated effluent is discharged to Periyar River. For hide soak water, solar evaporation Tank is provided. The Chrome rich effluent from pickling and tanning section is processed in the chrome recovery unit. As reported by the inspection Team, some of the unit operations of ETP (aeration tank & secondary clarifier) were not in operation and made operational at the time of inspection. Also, ETP is having a network of open drains.
5. The treated waste water samples were collected by the inspection team from delay pond. The laboratory analysis result of treated effluent indicate that the unit is non-complying with the notified effluent discharge standards for tannery sector with regard to pH- 4.8 (against 6 to 9).
6. The unit has installed On-line Continuous Effluent Monitoring System (OCEMS) in the delay pond before the final discharge for measuring, flow, TSS, BOD, COD parameters. During inspection the OCEMS values of pH-5.8, COD-31.7 mg/L, BOD-5.3 mg/L and TSS- 31.1 mg/L were reported. Variation was observed between the OCEMS values and laboratory analysis results. The sensor for COD, BOD and TSS was improperly deployed/ mounted in the delay tank.
7. On the day of inspection, the entire area where aeration tank, sludge drying bed, sludge storage shed and solar evaporation tank are erected was water logged due to seepage of rain water from the neighboring industrial plot which is on an elevated terrain. Access to the ETP units and Sludge drying beds was not accessible due to water logging.

8. The Unit has not made any provision in the ETP and hazardous waste storage area to manage runoff/ flood water.
9. The ETP sludge (cake) is disposed through M/s KEIL, TSDF.
10. The Unit has not provided permanent covered storage shed for storing hazardous waste.
11. The Unit has not installed Flow meter/water meter for intake water and for reuse of certain effluent streams.
12. The Unit has not maintained the log book for fresh water consumption.
13. The Unit is not maintaining the record of salt management from the process and solar evaporation Tank.
14. The Unit has installed display board at the entry gate as per the Hon'ble Supreme Cout order in WP-657/1995, but not updated the mandated information.

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;

NOW, THEREFORE, in view of the above-mentioned 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 TMS Leathers, D.A., Edayar, Muppathadam, Aluva, Kerala is hereby directed to comply with the following technical directives:

1. To ensure proper Operation & Maintenance of Effluent Treatment Plant (ETP) to meet out the effluent discharge standards notified by MoEF&CC on 10.09.2021 for Tannery sector.
2. To ensure regular Operation & Maintenance and calibration of OCEMS to obtain continuous & reliable results and maintain record for the same. Also, OCEMS sensors to be installed/ deployed/mounted as per the standard protocol.
3. To manage runoff / storm water near the ETP, solar evaporation tank and Hazardous Waste storage area to avoid water logging.
4. To discontinue the use of open drains for conveying untreated effluent to ETP for eliminating the risk of accidental discharge into the Periyar River.
5. To provide permanent covered storage shed for storing hazardous waste.
6. To install flow meter/water meter for intake water and for reuse of certain effluent streams. Also, to maintain the log book of fresh water consumption
7. To provide the details of ETP, Water Balance, OCEMS calibration record, third party inspection report, ground water monitoring report etc.
8. To Provide records for salt management from the process and from the solar evaporation tank.
9. To avoid using solar evaporation tank to manage soak water during rainy seasons.
10. To improve the overall housekeeping in the premises.

11. To get amended the CCA by KSPCB in view of the notified discharge standards and maximum specific water consumption prescribed vide notification dated 10/09/2021 for Tannery sector.
12. To ensure regular updation of information on display board in compliance to the Hon'ble Supreme Court's order in WP(C) 657 of 1995.

M/s TMS Leathers, D.A. Edayar, Muppathadam, Aluva, Kerala shall ensure the compliance of directions mentioned above and submit duly notarized point wise reply along with measures taken in compliance to all the points mentioned at Sr. no. 1 to 12 within 30 days from the date of issuance of directions. In case of failure, the Board will be constrained to initiate action in accordance with the provisions of the Environment (Protection) Act, 1986.

(AMANDEEP GARG)
CHAIRMAN

Copy to:

1. Member Secretary, Kerala State Pollution Control Board Head Office, Pattom. P. O Thiruvananthapuram-695004	For kind information, please
2. Joint Secretary (CP Division) Ministry of Environment, Forest & Climate Change, Prithvi Block, Indira Paryavaran Bhawan, Jorbagh Road, New Delhi – 110003	For kind information, please
3. The Regional Director Regional Directorate Central Pollution Control Board, 1st & 2nd Floors, Nisarga Bhavan, A- Block, Thimmaiah Main Road, 7th D Cross, Shivanagar, Bengaluru –560 079 (Karnataka)	With the request to follow u & ensure compliance of th directions
4. Divisional Head, IT Division, CPCB, Delhi	With the request to upload th Directions on CPCB website
5. Divisional Head, IPC-VI Division, CPCB, Delhi	For Kind information, please.

(BHARAT KUMAR SHARMA)
MEMBER SECRETARY