JOINT INSPECTION REPORT (25.04.2017)

OF

THE SPECIAL INSPECTION COMMITEE

Constituted by

Hon'ble National Green Tribunal

(Order dated 24th April, 2017)

IN THE MATTER OF

M.C. MEHTA VS. UNION OF INDIA

[O.A. NO. 200/2014]

- Submitted by-

Shri R. N. Jindal, Director Ministry of Environment, Forest and **Climate Change**

Member Secretary Uttar Pradesh Pollution Control Board

Shri Sundeep, Director (T-II) National Mission for Clean Ganga Central Pollution Control Board

Member Secretary

JOINT INSPECTION REPORT OF THE SPECIAL INSPECTION COMMITTEE CARRIED OUT ON 25.04.2017 IN THE MATTER OF M.C. MEHTA VS. UNION OF INDIA [O.A. NO. 200/2014] ON THE DIRECTIONS OF HON'BLE NGT DATED 24.04.207

1. Subject Matter

Matter: M.C. Mehta Vs. Union of India, O.A. No. 200/2014 - C.W.P. 3727/1985.

Subject: Prevention and Control of Pollution of River Ganga – Segment B – Phase I, Haridwar to Kanpur downstream (Unnao).

2. Order of Hon'ble NGT dated 24.04.2017

The Hon'ble Tribunal in the said matter passed the following directions on 24.04.2017 which is placed as under:-

Consequently, we hereby constitute a special inspection team consisting of Member Secretary, Central Pollution Control Board; Mr. Sandeep, Director (Tech.), National Mission for Clean Ganga; Mr. R.N. Jindal, Director, Ministry of Environment, Forest and Climate Change and Member Secretary, Uttar Pradesh Pollution Control Board or his nominee being a senior most officer of the Board. This Committee shall inspect the industries tomorrow as follows:-

1. The industries will continue to operate to their optimum capacity and would keep all their records ready without default.

2. In the light of above, if any industry is found to be avoiding compliance of directions and to be inoperative, the inspection team shall shut down the same forthwith and it would be sealed by the Committee.

3. The Committee shall be provided all assistance and SHO of the concerned area is also directed to provide Police Assistance to them for proper execution of this order.

4. The inspecting team shall prepare complete and comprehensive report, to be specific, on the following:-

a) What is the source of water used by the industry and its quantity, availability, water meters etc.

b) Whether the unit are ZLD. ZLD means they are not discharging any effluent, either on the land or in the waterbody or at any other place for that matter. They should be able to either not discharge a drop of liquid or recycle the same entirely without releasing thereto any effluent.

c) Whether adequate ETPs have been provided and were found to be functional or not at the time of inspection, including its adequacy; performance; and its records thereof.

d) The Committee would collect effluent samples at the inlet and outlet of the ETP and at the point of discharge, at the ultimate end.

e) Whether there is separate provision of Energy Meter for the ETP/ZLD.

f) Whether there are online monitoring system installed and operative and if so connected to which authority, calibration/validation thereof;

g) Whether water flow-meter have been installed.

h) The inspection team shall also analyze the effluent quality at the end of the drain as well as at the point where Mahua starts.

i) The samples shall also be collected from the drain nearest to the industrial unit.

j) The committee may also examine the Ambient Air Quality in that area.k) Whether any of the industries have a by-pass mechanism provided in the

factory, even if it has been now closed or groundwater injection system.

I) The inspection shall also verify the agricultural areas used for disposal of effluent of the industries.

3. The Committee and its execution

In compliance of the directions of Hon'ble NGT, the Committee consisting of Member Secretary, Central Pollution Control Board; Mr. Sundeep, Director (Tech.), National Mission for Clean Ganga; Mr. R.N. Jindal, Director, Ministry of Environment, Forest and Climate Change and Member Secretary, Uttar Pradesh Pollution Control Board visited the area called, Gajraula on 25.04.2017 and inspected the following industries-

- 1. M/s ASP Sealing Product Ltd., Gajraula
- M/s. Jubilant Agri & Consumer Products Ltd.(Fertilizer Unit), Bharatigram, Gajraula, District – Amroha, UP
- M/s. Jubilant Life Sciences Ltd. (Chemical Unit I), Bharatigram, Gajraula, District – Amroha, UP
- 4. M/s. Jubilant Agri & Consumer Products Ltd. (Polymer unit), Bharatigram, Gajraula.
- M/s. Jubilant Life Sciences Ltd. (Chemical Unit II).Bharatigram, Gajraula, District – Amroha, UP
- M/s Jubilant Life Sciences Ltd. (Distillery Unit), Bharatigram, Gajraula, District Amroha, UP
- 7. M/s Insilco Ltd., A-5, UPSIDC Industrial Area, Gajraula, UP
- 8. M/s. Kamakshi Papers Pvt. Ltd., Gajraula
- 9. M/s Dairy India Private Ltd. Gajraula, Amroha, UP
- 10. M/s. Kaushambi Papers Mills Pvt. Ltd., Khasra No-138, Naipura Kadar, Dhanaura, Gajraula, Amroha, UP

The Committee focused and concentrated on the issues directed by the Hon'ble NGT w.r.t. each industry. The Committee has also given due attention on the house-keeping, drainage, maintenance of ETP, utilization and disposal of treated effluent, compost making, effluent storages, utilization of groundwater for dilution purpose, solid / hazardous waste management and the impacts of effluents on environment.

4. Collection of Samples

The Committee has collected samples from industries so inspected and samples have been analyzed in CPCB lab for the parameters relevant to that particular industry.

The Committee has further collected, ground water samples for which the local farmers made a reference during the visit. The samples have been analyzed in CPCB laboratory (EPA recognized) following specified methods as per American Public Health Association (APHA) and the guidelines / SoP certified by the National Accreditation Board for Testing and Calibration Laboratories (NABL).

5. Industry-wise Inspection Reports

Altogether 10 industries were inspected by the Committee of which 9 are out of 12 units mentioned and placed before Hon'ble Tribunal by the Learned Counsel of UPPCB. The Industry-wise Inspection Reports are given in **Annexure-I** (Page 16 to 30).

Subsequent to the direction of Hon'ble NGT (dated 28.05.2017), two Senior Scientists of CPCB along with official from NMCG, MoWR, RD & GR visited remaining 3 industries on 01.05.2017 namely:-

- 1. M/s. Coral News Prints, Gajraula, J P Nagar
- 2. M/s. Teva API India Ltd. A-2/1, A2/2, UPSIDC Industrial Area Gajraula
- 3. M/s. Umang Dairies Ltd. 3km. Hasanpur Road, Gajraula

The brief report of these units (without test report) is also given at **Annexure – II** (Page 31 to 33).

6. The Observations / Findings / Recommendations

The unit-wise observations / findings are summarized as under:-

6.1 M/s ASP Sealing Product Ltd., Gajraula

Observation(s):

- (i) This unit is an ancillary unit for automobile industries and their products is rubber sealing.
- Industry uses water in boiler, cooling of extruders, coolants along with lubricant for grinding / cutting operations as a result, generating estimated quantity of effluent, around 0.5 KLD.
- (iii) Effluent is stored in a holding tank but, near the tank inundated water with oily scum was observed.
- (iv) The test report of sample collected from holding tank indicates the results as under:-

рН	: 7.22
COD	: 1599 mg/l (250 mg/l)
BOD	: 389 mg/l (30 mg/l)
TSS	: 585 mg/l (100 mg/l)
Oil & Grease	: 904 mg/l (10 mg/l)

Recommendation(s):

- 1. The industry shall install effluent treatment plant (ETP) to meet the stipulated standards.
- 2. Treated water should be utilized for cooling and other low quality water requirement purposes to reduce axillary water requirement.
- 3. Treated effluent should be properly utilized for gardening.
- 4. After polishing the effluent, effluent should go back for cooling purpose within the industry thereby reducing the ground water consumption.
- 5. The oil containers and other solid waste materials needs to be handled as per the provision of Hazardous Waste Rules, after characterization and found applicable. Else, should be managed as per the direction of UPPCB to avoid any littering, open burning or in-secured land disposal to avoid contamination of land and/or around or surface water bodies.

6.2 TO 6.6 M/S JUBILANT LIFE SCIENCES LIMITED, GAJRAULA (COMPLEX),

The Jubilant Group of industries are situated in an integrated complex consisting of

- a) Coal based Captive CO-generation Power Plant (48 MW capacity)
- b) Molasses based Distillery (305 KLD Ethyl Alcohol)
- c) Chemical Unit 1 (Formaldehyde, Acetaldehyde, Ethyl Acetate, Acetic Acid, Acetic Anhydride, etc,.) and
- d) Chemical Unit 2

- e) Fertilizer Unit
- f) Polymer unit

This industrial complex has common utility services catering to the auxiliary and process support requirement such as:

- 1. Water Management System (DM Water, Process steam, Spent Solvent Recovery systems)
- Common Cooling Water blowdown effluent management system (CTRO) 1200 KLD
- 3. Chemical Effluent Treatment Plant (CETP) 700 KLD
- 4. Incinerators 3 nos for Liquid 288 KLD & 2 nos for Gaseous/Thermo Oxidiser
 1500 kg
- 5. Secured landfill 11000 MT

As informed by the unit representative, all units were operating with valid consent.

The unit wise findings are as below:

A. Captive Power Plant (48 MW or equivalent capacity)

The integrated chemical complex has a coal based co-generation power plant for its captive requirement of power and steam. It has 2 x 90 TPH (High Pressure Boiler) for turbine operation. The released low-pressure steam from turbine operation is used to meet the process and heating requirements for the industrial units situated within the industrial complex of Jubliant. There are 2 nos. Medium Pressure Boilers (24 TPH an 34 TPH) as a standby as reported.

Observation(s):

- 1. The power and steam supply to meet the requirement of all units/process in the industrial complex are made from common facility Captive Power Plant
- 2. The power plant is coal based facility and has power generation as well as steam generation facility.
- 3. The boilers are equipped with ESP, however, the management and disposal of bottom ash and fly ash is very poor.
- 4. No significant or considerable emission from boiler stack was visual observed.
- 5. The source of water for Captive Power Plant is Ground water,
- 6. Ambient air quality status within plant area as well as affected zone in the vicinity of the plant was visually observed as very poor. Heavy cloud of fly ash dust arising from the fly ash storage area was affecting the visibility within the industry operation area.
- 7. Primary assessment based on the discussion with the plant officials revealed that the fly ash is partially utilised and significant amount is stored in their identified storage pond. However, huge dust was arising from the storage area. This was

mainly due to lack of appropriate measures in place to control and prevent resuspension of ash. This also reveal poor fly ash utilisation potential available with the unit.

- 8. Wet fly ash pond is situated about 3 km from plant premises. Ash slurry is pumped through a closed pipeline, but settled water recycle arrangement from the ash pond was not found.
- 9. The provisions of Fly Ash management Rules 1999 (amended- 2016) is apparently not complied with by the unit.
- 10. The percentage utilization of DM water against the installed capacity (88%) vis-àvis utilization of Power and Steam generation (Coal fired, slop fired and WHRB) which is 58%, suggest that the unit is operating with low ratio of cycle, thereby having higher water consumption.
- 11. Non-complying

Recommendation(s):

- a. The unit shall have a robust and appropriate fly ash management system as per the provision of **fly ash rules**
- b. The unit shall install adequate number of dust suppression system at critically identified locations, proper covering of bottom ash and fly ash in the pond, use ash pond as ultimate option for storage, 3 months plan for fly ash utilisation, and promotion and facilitation of brick/tiles manufacturing and other such uses facilities through community entrepreneurship promotion.
- c. The units shall use washed coal as per the MoEF notification
- d. Proper ash management records shall be maintained and submitted to UPPPCB.
- e. The unit shall be instructed to put continuous ambient air quality monitoring station.
- f. The industry shall be directed to take a detail water audit of all its water and steam intensive process including their associated utilities/auxiliary services in order to identify the water conservation measures and submit corrective action plan for its implementation to UPPCB.

6.2 M/s Jubiliant Life Sciences Ltd. (Distillery Unit)

- (i) The Distillery was found operational at 120 KLD capacity against consented capacity of 305 KLD (Ethyl Alcohol) and adopts both options of effluent treatment acceptable by the CPCB
 - a. Bio-composting
 - b. Slop Incineration Approach
- (ii) The unit claims to have infrastructure to achieve Zero Liquid Discharge (ZLD) by combining both the options.
- (iii) The spent wash is subjected to Bio-methanation process for recovery of energy. The bio-methanated spent wash (BMSW) is sent to RO (1200 KLD) where assuming 60% permeate is return to the process for molasses dilution and remaining 40% is subjected for Multiple Evaporation (MEE) The MEE operates

with an efficiency of 70%, i.e., 70% water is recovered and 30% slop generation is stored for either Bio-composting or Slop boiler feed.

- (iv) During the time of the visit, all effluent treatment facilities of the distillery Viz. Reverse Osmosis, Multiple Effect Evaporator, Incinerator and Biocomposting were in operation. The Reverse osmosis plant was operating close to its design capacity (54 KL/Hr).
- (v) MEE was operating at 40% of its installed capacity at the time of inspection, with about 70% recovery.
- (vi) Slop boiler unit was operating at 4 KL/Hr (100 KLD against installed capacity -300 KLD). The ash from the Slope boiler is disposed to the fly-ash dump yard as reported.
- (vii) The Bio-composting facility has capacity to handle approximately (200 T/row x 110 rows x 3 rounds of 90 days each) = 66,000 MT of press mud per annum. Assuming an average 1.5-1.8 m³ of MEE concentrate / Ton of press mud for final bio-compost output, total consumption of MEE Concentrate will be approximately 1,18,800 cum per annum.

Considering 300 days of slope boiler feed operation, the total MEE reject feed consumed is assessed as (300 days * 300 KLD) = 90,000 cum per annum. So, total reject consumption facility available with the units is as below:

S.No	Description	KLD	KLA (300 days)
А	RO Feed capacity of BMSW	1200	3,60,000
В	RO Reject generation (40% of 1200 KLD)	480	1,44,000
С	MEE feed capacity	1600	4,80,000
D	Remaining capacity of MEE after RO reject (1600 KLD – 480 KLD)	1120	3,36,000
E	Reject generation from MEE (30% of 1600 KLD)	480	1,44,000

Therefore, even the unit has more capacity to utilise the MEE reject, the critical capacity of the wastewater management system is that of MEE installed capacity, which is 1600 KLD. The optimised feed consumption of Bio-Methanated Spent Wash (BMSW) after considering RO reject (40% of feed) and remaining BMSW works out as (A+D) - 1200 + 1120 = 2320 KLD.

Assuming the Spent wash generation rate (Continuous process) of 12 KI per KL of alcohol production, the installed capacity for ZLD achievement through RO + MEE + (Bio-composting/Slope Boiler) is equivalent to (2320/12) – 190 KLD.

The above calculation don't includes other low strength wastewater generated from the distillery process.

Therefore, it is observed that the available infrastructure acceptable to achieve zero liquid discharge from distillery units is only for production of 190 KLD instead of consented capacity of 305 KLD.

(viii) About 3 km away from the plant, there is a compost making yard which has been covered with the shed. However, there was no immediate record shown on the site relating to procurement of press-mud and utilization of spent wash.

- (ix) Further, the compost is reported to be given to the marketing companies. This is also to submit that, prior to the selling of compost, the distillery is required to get the compost samples analysed and execute marketing with proper marking / specifications on the bags.
- (x) The spent wash has been stored in the lagoon and its storage with huge quantity is of serious concern to the Committee as its management.
- (xi) As per the information provided, the bio-compost area is about 30 acres. Certain portion about 3 acres have covered facility, to make it workable during monsoon season. But, there is no provision made for storage of finished compost as per the requirement of CPCB guidelines. However, shed for storage of Press Mud, finished bio-compost, screening and bagging, facility are apparently not available as per CPCB guidelines.
- (xii) The unit has a line paccu lagoon of 44,000 cum to holding the MEE reject for use in bio-composting. As reported, the lagoon has not been cleaned for last 5-6 years, and therefore considerable amount of accumulation sludge is there in the pond, which has reduced its holding capacity. In absence of level reading staff, the storage capacity utilised at the time of inspection could not be assessed.

As per CPCB regulatory provision, the holding capacity shall be not more than 30 days of spent wash generation. Considering 305 KLD, the total holding capacity allowed is about (305 KLD x 12 KL/KL x 30 days) = 109800 KLD against the present 44,000 KL (40%). However, the lagoon is not protect (fencing) from outsider trace passing, and having high risk of safety hazards/accident.

- (xiii) No ground water monitoring Piezowell based on the ground water flow direction was found near the lagoons or bio-composting plant, however, the unit representative informed, that two such well are available. The details were not provided during the visit.
- (xiv) The industry on the spot could not provide the record on utilization of spent wash in RO / MEE / SFB linking with spent wash generation and utilization in corresponding processing unit.
- (xv) Near the RO plant, huge flyash deposition was seen in the open ground which incidentally got suspended in air due to sudden strong windy conditions. This has shown the improper management of fly ash (from captive thermal power plant).
- (xvi) It was also observed near compost / logoon area, the Committee apprehended the spent wash and utilized compost was spread in the large area and was levelled and covered with earth soil. It is felt that during rainy season the rain water will seep through such area and add colour to the ground water (for quick test, the sample of the ground where compost / spent was and soil was mixed, the samples was taken in a plastic bottle and was filled with the water and the colour obtained is shown in a plate / photo given in **Annexure -III**).
- (xvii) Non-complying and subjected for regular monitoring and action plan to improve conditions.

Recommendation(s):

- a. The industry shall provide necessary infrastructure fat the bio-compost yard as per the provisions of CPCB guidelines
- b. The MEE reject storage lagoon (44000 cum) shall be divided with provision of necessary safety and security measures.

- c. There shall be adequate number of groundwater monitoring well in and around compost yard and the monitoring result shall be put in public domain.
- d. Inventory records of press mud, bio-compost and wastewater utilization shall be maintained.
- e. UPPCB shall modify the consented production capacity of the unit as per the available operational infrastructure to meet the stipulated conditions.

6.3 M/s Jubilant Agro & Consumer Products Ltd.,(Fertilizer unit)

 It has been informed that the unit is recycling its effluent into the process and no effluent are required to be disposed.

6.4 M/s. Jubiliant Life Sciences Ltd. (Chemical Unit I) and

6.5 M/s. Jubiliant Agri & Consumer Products Ltd. (Polymer unit)

- The effluent generated from the Chemical Plant Unit –I and Polymer unit is treated at the Chemical Effluent Treatment Plant
- (ii) There is no MoU between the different units having individual consent to operate for contribution/conveying their effluent to the CETP. Therefore, the primary raw water quality will be subjective and meeting the norms will be a major challenge. Apart from the operational difficulties, it is difficult to take any action by the regulatory body in case on non-compliance observed to the stipulated norms/ provisions as onus and obligation to meet the regulatory norms is not clear.
- (iii) The CETP was found operational during the visit. Water samples from the inlet, outlet and aeration tank – I was collected to assess the performance. Results suggests MLSS concentration to be in acceptable range.
- (iv) The hydraulic gradient line of the CETP was non-continuous; an essential parameter to support is proper functioning. It suggest there is a design and/or poor maintenance issue.
- (v) The energy meter reading depicts the energy consumed; however, it is very difficult to infer any conclusion on CETP operation status from the consumption data, unless correlation of energy consumed and requirement is defined with a 7-day optimised operation of the CETP facilities.
- (vi) The CETP is equipped with online effluent monitoring system and it needs to be verified from the observed value during the field visit to assess the variation, if any.
- (vii) The treated wastewater is reported to be used for horticulture within the unit area. There is no documentation / records maintained for the purpose. It needs to be verified to ensure that there is no direct or in-direct discharge of such treated water.
- (viii) There was no irrigation plan to utilize treated effluent
- (ix) Further the characteristics of inlet and outlet are as under:-

Source	рН	TSS	COD	BOD	MLSS
Inlet	3.26	142	2742	1732	
Outlet	8.12	21	125	28	
Aeration tank					1445

All the concentrations are expressed in mg/l except pH

(x) Non-complying with reference to function aspects of CETP and subject to regular monitoring.

Recommendation(s):

- a. All individual consented unit using the common facilities, (Cooling tower water system, steam and CETP etc.) shall have a MoU and identify the ownership and obligatory unit for compliance to stipulated norms. The same shall be considered by UPPCB for issuance of consent to operate.
- b. Water balance, steam balance, wastewater generation and return to common system shall be studied in detail and thereafter a proper water balance report shall be prepared. The report shall be submitted to UPPCB within a period of 3 months, before onset of Monsoon. UPPCH shall consider the finding and appropriately modify the consent condition with an objective to conserve groundwater and reduce water consumption/ achieve ZLD.
- c. Energy consumption and its correlation with the records of dedicated energy meter for ETPs, Water Meters shall be carried out through a study over a period of 7 days of optimized operation of ETP/CETP. This will help in inferring the energy consumption and operational status of various component and overall performance of CETP/ETP.

6.6 M/s. Jubiliant Life Sciences Ltd. (Chemical Unit II),

This unit manufactures Pyridine and its derivative fine chemical compounds including Cyano Pryridine, Lutidine and Picoline. The committee could not visit this units, however, the effluent from these units are recalcitrant in nature and doesn't qualify for biological treatment. The committee has not visited the process area of these units.

- (i) The wastewater generated from these units are primarily non-biodegradable in nature and difficult to be subjected for conventional biological based effluent treatment plant. The recalcitrant nature of wastewater is subjected to thermal process.
- (ii) As reported, 3 numbers of liquid incinerator (288 KLD) for management of such wastewater has been provided.

6.7 M/s. Insilco Ltd., Gajraula

- (i) This industry is involved in washing / processing of sand used in tyre industries.
- (ii) The industry generates effluent having high Total Dissolved Solid (TDS).
- (iii) At the time of inspection the effluent being discharged and the collected outlet sample shows TDS of 320 mg/l. However when the samples were picked-up from the Bagad River where the effluent is being disposed indicated TDS of 11284 mg/l.
- (iv) The industry is using around 2 MLD of groundwater for diluting of effluent to achieve the standards of prescribed for SAR. Therefore, this industry should essentially operate on ZLD system and by recovery of salt (Na2SO4) with any appropriate system. In no case effluent be disposed in ambient environment.

	•			
pН	TDS (mg/l)	SAR	SO4-(mg/l)	F-
				(mg/l)
7.17	11112	27.7	5480	4.44
7.64	320	6.4	55	0.41
7.13	10448	34.6	5932	3.92
	7.17	7.17 11112 7.64 320	7.17 11112 27.7 7.64 320 6.4	7.17 11112 27.7 5480 7.64 320 6.4 55

(v) The characteristics of samples collected are as under:-

All the concentrations are expressed in mg/l except pH

(vi) Non-complying. To adopt ZLD

Recommendations;

- a. The unit shall stop using fresh water dilution for reducing the SAR in order to comply with the consent condition.
- b. The treated water may be explore of its use at nearby industries so that the overall stress on ground water in the area is reduced. This approach shall be through MoU and consent of UPPCB.

6.8 M/s. Kamakshi Papers Pvt. Ltd. Gajraula

- (i) This industry is utilizing waste paper for manufacturing newsprint paper.
- (ii) The sludge drying beds were flooding. The industry reported that hard board manufacturers could not lift this sludge which they use as raw material.

Source	TSS	COD	BOD
Inlet	761	474	113
Outlet	58	222	52

(iii) The results of the ETP are as under:-

All the concentrations are expressed in mg/l except pH

- (iv) The ETP shows higher value of BOD, COD, exceeding the prescribed limits and the treated effluent are used in the process and applied on land for irrigation purpose thereby not discharging.
- (v) There is a bypass arrangement which should be sealed.
- (vi) Non-complying require to block by-pass and de-sludge

6.9 M/s. Dairy India Pvt. Lid, Gajraula

- (i) There ETP was operational and growth of algae in aeration tank indicated improper function of the aeration tank.
- (ii) The treated effluent is being claimed to be utilized for gardening. The treated effluent shows higher value of BOD.
- (iii) Permission from the CGWA is not available.
- (vii) The results of the outlet sample collected from ETP are as under:-

Source	pН	TSS (mg/l)	COD (mg/l)	BOD (mg/l)
Inlet	4.35	1700	5344	1025
Outlet	8.40	37	142	53

(viii) Non-complying. Need to improve ETP functioning

6.10 M/s. Kaushambi Papers Mills Pvt. Ltd.

- (i) Waste was strewed around the campus and was piled on the land claimed to be owned by the unit.
- (ii) Sludge was not properly stored and was found outside of the premises also.

(iii) Not operating due to mechanical fault.

7. Ambient Conditions

The special team has reached Gajraula and collected samples from the Bagad drain from NH 24. The upstream of the drain was also traced and found to be dry before the confluence of the industrial effluent from M/s Insilco Ltd., A-5, UPSIDC Industrial Area, Gajraula, UP. The Bagad drain is also known as Barad river which is presently dry at upstream of effluent disposal point of Insilco.



Dry	Bagad	drain	before	effluent	Samples	collected	from	Bagad	from	the
dispo	osal point	from N	1/s Insilco	o Ltd	bridge of	NH-24				

The analysis result of the samples collected from of the drains at NH-24 are as follows;

Source	рН	COD	BOD	TDS	SAR	NH3-N
Inlet	7.24	68	18	11284	29.9	BDL

All the concentrations are expressed in mg/l except pH

Samples were also collected from the groundwater of the agriculture near the railway line in between the Jubilant Industrial complex and the compost yard located indicates yellow reddish colour and as per the villagers that was effect of previous practice of ferti-irrigation of the M/s Jubilant Life Sciences Ltd. (Distillery Unit).



Ground sampling point



Analysis result of the ground water:

Source	Hq	EC	TDS	сор	BOD	Total Alka as	Total hardne	Calciu m as	Chlorid e	Sulphat e	NO2-N	NO3- NO3	Fluorid e
Grou nd water	7.8	168 8	982	52	3	198	520	200	107	467	0.0 8	0.8 1	0.4 6

Further, the poinwise information gathered by the committee on 13 points as per order is given in **Annexure – IV**

7. Conclusion:

The committee based on the inspection carried out in 9 units has reached to the following conclusion:-

- A. Ground water is the only source for all industries. The industries are not having regards for ground water depletion or conservation. Water conservation through high degree of recycle and reuse to minimize stress on ground water were not observed.
- B. Ground water recharging / rain water harvesting facilities were not highlighted by the industries to the committee during the visit by nay of the industries.
- C. Permission from Central Ground Water Board were not available with the industries at the time of visit.
- D. All industries claim to use treated wastewater (Industrial/sewage) for gardening / horticulture. There is no provision to deal with treated wastewater during rainy season, therefore, there will be discharge during rainy days, irrespective of land area available to the industries for irrigation. Thereby, reuse and recycle of treated water within the industrial process, utilities are essential with adequate storage facility to cater the storage capacity during non-irrigation period.
- E. The ground water sample collected from irrigated farm land was showing colour (Pale yellow). This may be attributed to the past disposal practices of spent wash in the contiguous area.
- F. Records and data supporting Water balance, wastewater management, compliance to the condition of consent issued by UPPCB were readily not available with the industry.
- G. Based on the available infrastructure and explained utilization mechanism of treated wastewater management system of all industries, the committee has strong apprehension that the units are not operating as Zero Liquid Discharge (ZLD). The discharges are through unauthorized ways (to low laying area etc.) under the cover of horticulture/ irrigation purposes.
- H. Water balance report shall be submitted by all industries to UPPCB and after verification, modification in operating consent condition may be made, wherever found necessary.
- I. The unit wise observation and associated recommendation(s) made by the committee, shall be assessed by UPPCB and the industry and appropriate measure shall be submitted as time bound action plan in form of Affidavit to Honb'le NGT for its compliance, before the units are considered to start its operation.

- J. Community Monitoring system for close compliance verification shall be considered with members selected by local authority consisting of locals, farmers, eminent person of the area, subject and industry process experts, representative from PCBs, Industry department. The finding and action taken report shall be put on district administration website.
- K. Physical outlet of ETPs indicate that regular operations are not ensured which was evident due to maintenance of tanks, clafifier, sludge drying beds etc.

8. Units visited on 01.05.2017

Pursuant to the order of Hon'ble Tribunal dated 28.05.2017, CPCB deputed two senior scientist with UPPCB & NMCG to inspect 3 remaining units namely:- i) M/s. Umang Diary Ltd., ii) M/s. Teva API Ltd. & iii) M/s. Coral Newsprint Ltd. At the time of writing the report, analytical reports were awaited (will be ready by this week). However, the observation on report is given on these units (Page No. 31- to 33)

Details of the Individual Units

1. M/s. ASP Sealing Products Ltd.

SI. No.	General Information						
1.	Name and address of the	Industry	A-7, U	PSIDC Ind	l Products L ustrial Area, gar (UP) 244	Gajraula, Dist.	
2.	Contact Person & No.			dadhay	- , <i>i</i>		
3.	Name of Product		Sealing	g Product			
4.	Consent for air		Valid u	pto : 31/12/	′17 (Copy er	iclosed)	
	Consent for water		Valid u	Valid upto : 31/12/17 (Copy enclosed)			
5.	Water Source		Croand	d Water Permissior	n applied		
6.	Water consumption			two pumps		ok, the units is 24 KLD water is	
7.	Samples (from Storage	Pit) analys					
	Parameters	рН	TSS (mg/l)	COD (mg/l)	BOD (mg/l)	Oil & grease (mg/l)	
	Samples from the units	7.22	585	1599	389	904	
	General discharge standards (land)	5.5-9.0	200	250	100	10	

Photographs



Floor washing are not being collected properly

Observations:

- Dry processing units, however, spillage of water was observed which is stored in sump
- No treatment facility is available and untreated wastewater is being utilised for gardening.
- The quality of wastewater sample collected from the units indicates non-compliance to BOD 389 mg/l, COD 1599 mg/l, Oil & Grease 904 mg/l and TSS, 585 mg/l.

Recommendation(s)

- 1. The unit should have a properly designed Effluent Treatment Plant (ETP) and comply with the stipulated norms.
- 2. The water balance study shall be carried out and submitted to UPPCB for better transparency in water management and imposing appropriate consent condition for operation.

2. M/s Jubiliant Life Sciences Ltd. (Distillery Unit)

1.	Name of the unit and address			e Sciences Ltd. (Distillery Unit), ula, District – Amroha, U.P,-244223	
2.	Name of the Contact person – Designation Contact No.	(Un Mot	Bhardwaj Ser it Head) bile: 812642455 (: 05924-25235		
3.	Year of Commissioning.	198	2		
4.	Sector	Priv	ate		
5.	Production details.	Alco	ohol		
	Products	305	KLD		
	Installed Prod. Cap.Operating capacity	120	KLD (on the da	ay of inspection).	
6.	Manufacturing process details & flow diagram	Flov	w Diagram		
7.	Raw material	1.	Molasses : 140	00 MT/day	
8.	Operational status	Ope	erating		
B: Wa	ter Pollution and its Control:				
1.	Water Consumption (m ³ /day)	Indu	ustrial	2500 KLD	
		Domestic		20 KLD	
			ke up water ling tower	600 KLD	
2.	Sources water	Ground Water through borewell (NOC obtained from CGWA on 7/4/2017 for 3000 KLD)			
3.	Effluent Generation (m ³ /day)	Spent wash 12 KL/KL of alcohol			
4.	Details of Spent Wash Management	Bio-methansation - RO (1200 m ³ /day) → MEE (1600 m ³ /day) → Bio compost/slope boiler			
5.	Status of consent	Cor	sent for water \	/alid up to 31.12.2018	
	(Copy of the latest consent attached)	Cor	isent for air Vali	id up to 31.12.2018	
Sper	t Wash Management Bio-compos	ting			
1.	Total area available for bio-compos [1ha=2.5 acres]	sting	30 acres		
2.	Active area for bio compost preparation (acres)		30 acres		
3.	Facility for press mud storage		Area for press	s mud storage -6 acres	
4.	Facility for bio compost storage		3 acres		
5.	Spent wash storage capacity (m ³)		One lagoon of	capacity 44,000 m3	
6.	Arrangement for rainy season (Balance press mud storage facility compost storage, shaded etc	/,		structed in 3 acres for rainy season. inspection whole area was filled with mpost.	
7.	Adequacy of the system				
	a. Compost yard (lining, a catch pits etc.	area,	Composed ya	rd is having 1000 M ² shed.	
	b. Special precaution undigested spent w	for vash	Stored in Line	d lagoon	

	utilization for making compost	bio			
		and oduct urning lity of	Windrows method over a lined platform.		
	d. Storage facility for press and finished product	mud	Both press mud and finished product were stored in an open area.		
	• •	ninery gging chine	Aerotilers, trucks & JCB is available. Bagging and weighing facility not available		
Volume R	eduction System				
1.	Filtration system				
	Design capacity of RO Plant /Nano filtration (feed rate, m ³ , hr	RO p	lant is available with feed rate of 1200 m ³ /d		
2.	Details of pre-treatment of effluent being fed to RO	Bio-n	nethanation		
3.	 Operating condition a. Effluent feed rate (m³/hr) b. Operating pressure (kPa) c. Reject generation (m³/hr) d. Permeate (m³/hr) 	52 m ³ /hr 29 cum/hr 23.8 m ³ /hr			
4.	Facility for permeate storage and its management(recycle/reuse/ discharge)	Perm	neate is recycled to distillery for molasses dilution		
5.	Waste water generation	Not a	assessed		
6.	Power consumption (kWhr)	Not a	assessed		
Evaporati	on system				
1. 1	Design capacity of evaporator Number of effect in	1600 5	m ³ /day		
	evaporator				
2.	Steam consumption (tonne/hr & temp in each effect)	250 k	<t feed<="" kt="" of="" td=""></t>		
3.	Generation of condensate (m3/hr) from each effect	70%	of total feed		
4.	Normal uninterrupted operating time (hr)	20 days/month			
5.	Frequency of cleaning of plates / tubes	Once	e in 20 days		
6.	Waste water generated from cleaning operation (m ³) and disposal system	200 ł	KL/month and		
7.	Cleaning mechanism (manual / mechanical)	Mech	nanical		

2. T b 3. T th (I s	The Distille (LD (Ethyl a. Bio- b. Slop The unit cla poth the op The spent nethanated he process	Alcohol) and adopts both composting Incineration Approach ims to have infrastructu- ions. wash is subjected to Bio spent wash (BMSW) is	n options of e re to achieve o-methanatio	ffluent treatmer Zero Liquid Di n process for r	st consented capacity of 30 nt acceptable by the CPCB scharge (ZLD) by combinin recovery of energy. The bio
2. T b 3. T th (I s	KLD (Ethyl a. Bio- b. Slop The unit cla both the op The spent nethanated he process	Alcohol) and adopts both composting Incineration Approach ims to have infrastructu- ions. wash is subjected to Bio spent wash (BMSW) is	n options of e re to achieve o-methanatio	ffluent treatmer Zero Liquid Di n process for r	nt acceptable by the CPCB scharge (ZLD) by combinin
2. T b 3. T th (I s	KLD (Ethyl a. Bio- b. Slop The unit cla both the op The spent nethanated he process	Alcohol) and adopts both composting Incineration Approach ims to have infrastructu- ions. wash is subjected to Bio spent wash (BMSW) is	n options of e re to achieve o-methanatio	ffluent treatmer Zero Liquid Di n process for r	nt acceptable by the CPCB scharge (ZLD) by combinin
2. T b 3. T tł (I s	a. Bio- b. Slop The unit cla both the op The spent nethanated he process	composting Incineration Approach ims to have infrastructu ions. wash is subjected to Bio spent wash (BMSW) is	re to achieve o-methanatio	Zero Liquid Di n process for r	scharge (ZLD) by combinin
b 3. T n tł (I s	b. Slop The unit cla both the op The spent nethanated he process	Incineration Approach ims to have infrastructu- ions. wash is subjected to Bio spent wash (BMSW) is	o-methanatio	n process for r	
b 3. T n tł (I s	The unit cla both the op The spent nethanated he process	ims to have infrastructu ions. wash is subjected to Bio spent wash (BMSW) is	o-methanatio	n process for r	
b 3. T n tł (I s	both the op The spent nethanated he process	ions. wash is subjected to Bio spent wash (BMSW) is	o-methanatio	n process for r	
3. T n tł (I s	The spent nethanated he process	wash is subjected to Bid spent wash (BMSW) is		-	ecovery of energy. The bid
n tł (I s	nethanated he process	spent wash (BMSW) is		-	ecovery of energy. The bit
tł (I s	he process	• • • •		1200 KI D) who	re 60% permeate is return
(I s	•		•		cted for Multiple Evaporation
S			-	•	water is recovered and 30°
	lop genera	tion is stored for either E	•		
4. C	During the	time of the visit, all ef	fluent treatm	ent facilities of	f the distillery Viz. Revers
C	Osmosis, N	lultiple Effect Evaporato	r, Incinerator	and Biocompo	sting were in operation. Th
R	Reverse os	mosis plant was operatir	ng close to its	design capacit	y (54 KL/Hr).
5. N	IEE was o	perating at 40% of its ins	stalled capac	ity at the time o	of inspection, with about 70°
	ecovery.				
	•		•	•	lled capacity - 300 KLD). Th
		e Slope boiler is dispose	•		•
			•	• •	ly (200 T/row x 110 rows x
		•	•	•	Assuming an average 1.5-1
		entrate will be approxima		-	t output, total consumption
IV			iciy 1,10,000		
	Con	sidering 300 days of s	lope boiler f	eed operation,	, the total MEE reject fee
С	consumed i	s assessed as (300 days	s * 300 KLD)	= 90,000 cum p	ber annum.
S	So, total rej	ect consumption facility a	available with	the units is as	below:
Г	S.No	Description		KLD	KI A (200 daya)
	<u> </u>	Description RO Feed capacity of I	BMSW	1200	KLA (300 days) 3,60,000
F	B	RO Reject generatio		480	1,44,000
		1200 KLD)	``		
_	C D	MEE feed capacity		1600	4,80,000
	1)	Remaining capacity of	IVIEE alter	1120	3,36,000
		RO reject (1600 KLD -	– 480 KI D)		

The above calculation don't includes other low strength wastewater generated from the distillery process.

Therefore, it is observed that the available infrastructure acceptable to achieve zero liquid discharge from distillery units is only for production of 190 KLD instead of consented capacity of 305 KLD.

- 8. As per the information provided, the bio-compost area is about 30 acres. Certain portion about 3 acres have covered facility, to make it workable during monsoon season. But, there is no provision made for storage of finished compost as per the requirement of CPCB guidelines. However, shed for storage of Press Mud, finished bio-compost, screening and bagging, facility are apparently not available as per CPCB guidelines.
- 9. The unit has a line paccu lagoon of 44,000 cum to holding the MEE reject for use in biocomposting. As reported, the lagoon has not been cleaned for last 5-6 years, and therefore considerable amount of accumulation sludge is there in the pond, which has reduced its holding capacity. In absence of level reading staff, the storage capacity utilised at the time of inspection could not be assessed.

As per CPCB regulatory provision, the holding capacity shall be not more than 30 days of spent wash generation. Considering 305 KLD, the total holding capacity allowed is about (305 KLD x 12 KL/KL x 30 days) = 109800 KLD against the present 44,000 KL (40%). However, the lagoon is not protect (fencing) from outsider trace passing, and having high risk of safety hazards/accident.

- 10. No ground water monitoring Piezowell based on the ground water flow direction was found near the lagoons or bio-composting plant, however, the unit representative informed, that two such well are available. The details were not provided during the visit.
- 11. The industry on the spot could not provide the record on utilization of spent wash in RO / MEE / SFB linking with spent wash generation and utilization in corresponding processing unit.
- 12. Near the RO plant huge fly ash deposition was seen in the open ground which inadvertently got suspended in air due to sudden strong windy conditions. This has shown the improper management of fly ash (from captive thermal power plant).
- 13. Further the compost is reported to be given to the marketing company for further movement. This is also to submit that prior to the selling of compost, the distillery is required to get the compost samples analyzed and execute marketing with proper marking / specifications on the bags.
- 14. It was also observed that the near the compost / logoon area, the committee apprehended the spent was and utilized compost was spread in the large area and was levelled and covered with earth soil. The committee felt that during rainy season the rain water will seep through such area and may cause coloration in the ground water (for quick crude test and following crude test the surface of the ground where compost / spent was and soil was mixed and was taken in a plastic bottle and was filled with the water and the colour obtained is shown in a plate / photo given in Annexure-III).

3. M/s Jubilant Agro & Consumer Products Ltd.,(Fertilizer unit)

01	Name of the industry & Complete Postal Address:	Ltd.,(Fo Jyotiba	2 M/s Jubilant Agro & Consumer Products Ltd.,(Fertilizer unit) Bhartiagram, Gajraula, Distt: Jyotiba Phule Nagar – 244223,Uttar Pradesh						
02	Name of Contact person with designation Phone & Fax No/Email:	Head) Mobile: 81	C B Bhardwaj Senior Vice President - Manufacturing (Unit Head) Mobile: 8126424555 FAX: 05924-252352						
03	Year of commissioning	1982	1982						
05	Installed Capacity, TPA	Sulphuric A	Sulphuric Acid-72000 TPA, Single Super Phosphate						
	Product & By product	 Single Super Phosphate Granulated SSP Sulphuric Acid 							
07	Status of consents & Authorization (validity)	SI. No.	Consent under	Validity Upto					
		1.	Air Act	31.12.2017					
		2.	Water Act	31.12.2017					
		3.	Hazardous Waste.	03.03.2021					
09	Raw material used / tonne	of product		•					
	Raw Materials		Sulphur, Rock Pl	nosphate					
	Sources water	Ground Water through borewell (NOC obtained from CGWA on 7/4/2017 for 1400 KLD)							
12	The waste water generated	is recycled i	n the process						
	Observations :								

4. M/s. Jubiliant Life Sciences Ltd. (Chemical Unit I)

01	Name of the industry & Complete Postal Address:	3 M/s. Jubiliant Life Sciences Ltd. (Chemical Unit I Bharatigram, Gajraula, District – Amroha, UP					
02	Name of Contact person with designation Phone & Fax No/Email:	C B Bhardwa Head) Mobile: 8126 FAX: 05924-2	424555	nt - Manufacturing (Unit			
03	Year of commissioning	1982					
05	Products & Installed Capacity, TPA	Acetaldehyde - 246600TPA Formaldehyde – 140400TPA Acetic anhydride – 39000 TPA Ethyl Acetate – 89425 TPA Acetic Acid – 210300 TPA					
	Raw Materials, TPA	Acetaldehyde- Ethanol-1.084 kl/MT Formaldehyde- Methanol – 0.42 MT/MT Acetic acid -1.227 MT/MT Ethyl acetate – Ethyl alcohol -0.73 KL/MT Acetic acid –Acetaldehyde -0.88 MT/MT					
07	Status of consents & Authorization (validity) (Copy enclosed)	Sl. No. 4.	Consent under Air Act	Validity Upto 31.12.2018			
		5.	Water Act	31.12.2018			
		6.	Hazardous Waste.	15.12.2017			
	Total Water Requirement	2351 KLD (including Domestic water requirement 375 KLD) (Water balance flow diagram enclosed)					
	Sources water	Ground Water through borewell (NOC obtained from CGWA on 7/4/2017 for 2300 KLD)					
	Waste water generation	175 KLD goe	s to CETP				
Effl	uent Treatment Plants:						
	erational Status (during ection):						

Installed Treatment Capacity,	The wastewater generated from Chemical Unit – 1, and
(m3/day)	Polymer Plant are collected and treated at the Chemical
	Effluent Treatment Plant (CETP).
	The CETP of 700 KLD capacity was found operational.
	(CETP flow diagram enclosed)
ETP & Sequence of Treatment	
•	
Process of the CETP are as fo	lows:
	hk (1 & 2) \rightarrow Reactivator Clarifier tank \rightarrow Aeration Tank 1 \rightarrow
	In Tank \rightarrow Sludge Clarifier Tank 2 \rightarrow Clarifier Water Tank \rightarrow
	Activated Carbon Filter (ACF) \rightarrow Final Water Tank \rightarrow Cooling
tower/Horticulture	
A DESCRIPTION OF THE OWNER OWNER OF THE OWNER OWNER OF THE OWNER OWNE	
Chemica	-Effluent Treatment Plant
Chemica	-Effluent Treatment Plant
Chemica	-Effluent Treatment Plant
Chemical	-Effluent Treatment Plant
Chemica	Effluent Treatment Plant
Chemica	-Effluent Treatment Plant
Chemica Menter Menter Menter Menter Menter	-Effluent Treatment Plant
Chemica	I-Effluent Treatment Plant
Chemica	-Effluent Treatment Plant
Chemica	-Effluent Treatment Plant
	I-Effluent Treatment Plant
	I-Effluent Treatment Plant

5. M/s. Jubiliant Agri & Consumer Products Ltd. (Polymer unit)

01	Name of the industry & Complete Postal Address:	M/s. Jubiliant Agri & Consumer Products (Polymer unit) Bharatigram, Gajraula.					
02	Name of Contact person with designation Phone & Fax No/Email:	C B Bhardwaj Senior Vice President - Manufacturii (Unit Head) Mobile: 8126424555 FAX: 05924-252352	ng				
03	Year of commissioning	1982					
05	Products & Installed Capacity, TPA	SPVA, PVA & Derivatives – 2458 MT/Month Wood finish – 450 MT/month Polyurethane & Derivatives					
	Raw Materials, TPA	Soild PVA Iso Propyl Alcohol Vinyl Acetate Monomer Di laurl Peroxide Wood Finish Acetone Xylene Toulene Ethyl Cellusolve N Butanol Ethyl Acetate					
07	Status of consents & Authorization (validity)	SI. No.Consent underValidity Upto1.Air Act31.12.20172.Water Act31.12.20173.Hazardous Waste.15.12.2017					
	Total Water Requirement	ent 250 KLD					
	Sources water	Ground Water through borewell (NOC obtained fron CGWA on 7/4/2017 for 250 KLD)	n				
	Waste water generation	571 KLD goes to CETP					



Obse	rvations:
1.	There is no MoU between the different units having individual consent to operate
	for contribution/conveying their effluent to the CETP. Therefore, the primary raw
	water quality will be subjective and meeting the norms will be a major challenge.
	Apart from the operational difficulties, it is difficult to take any action by
	the regulatory body in case on non-compliance observed to the stipulated
	norms/ provisions as onus and obligation to meet the regulatory norms is not
	clear.
2.	The CETP was found operational during the visit. Water samples from the inlet,
	outlet and aeration tank - I was collected to assess the performance. Results
	suggests MLSS concentration to be in acceptable range.
3.	The hydraulic gradient line of the CETP was non-continuous; an essential
	parameter to support is proper functioning. It suggest there is a design and/or
	poor maintenance issue.
4.	The energy meter reading depicts the energy consumed; however, it is very
	difficult to infer any conclusion on CETP operation status from the consumption
	data, unless correlation of energy consumed and requirement is defined with a
	7-day optimised operation of the CETP facilities.
5.	The CETP is equipped with online effluent monitoring system and it needs to be
	verified from the observed value during the field visit to assess the variation, if
	any.
6.	The treated wastewater is reported to be used for horticulture within the unit
	area. There is no documentation / records maintained for the purpose. It needs
	to be verified to ensure that there is no direct or in-direct discharge of such
	treated water.

6. M/s. Jubiliant Life Sciences Ltd. (Chemical Unit II)

01	Name of the industry & Complete Postal Address:		t Life Sciences Ltd. (C Gajraula, District – Amrol				
02	Name of Contact person		Senior Vice President -				
02	with designation	(Unit Head)		Manufacturing			
	Phone & Fax No/Email:	Mobile: 81264	24555				
		FAX: 05924-2					
03	Year of commissioning	1982	02002				
05	Products & Installed	Pyridine -152 T/day					
	Capacity, TPA	Pyridine derivatives -30 T/day					
	Raw Materials, TPA		taldehyde 1.335 MT/MT,				
		MT/MT and Ammonia -0.49 MT/MT is consumed of					
07		pyridine production respectively.					
07	Status of consents & Authorization (validity)	SI. No.	Consent under	Validity Upto			
	Authorization (validity)	1.	Air Act	31.12.2018			
		2.	Water Act	31.12.2018			
		3.	Hazardous Waste.	15.12.2017			
09	Raw material used / tonne	of product		-			
	Raw Materials		Sulphur, Rock Phospha	ate			
		2632 KLD					
	Total Water Requirement	(including Domestic water requirement 30 KLD)					
			ance flow diagram enclo	<i>i</i>			
	Sources water		ter through borewell (NO 7/4/2017 for 2600 KLD)	C obtained from			
	Waste water generation	571 KLD					
12	Effluent Treatment Plants:						
	MEE \rightarrow Incinerator						
	Concentrate of 222 KLD is b	urned in the Inc	inerator, The condensate	e is recycled in the			
	cooling tower			-			
	Observations:						
	1. The wastewater gene			-			
		•	to conventional biologic				
	treatment plant. The r	ecalcitrant natu	re of wastewater is subje	cted to incineration			
	process.						
	2. As reported, 3 number	ers of liquid inci	nerator (288 KLD) for ma	anagement of such			
	wastewater has been	provided.					

7. M/s Insilco Ltd.,

Α	General Information & Production Details:								
01	Name of the Address:	e industry & C	complete Pos	tal	M/s Insilco Ltd., A-5 UPSIDC Industrial Area Bhartiagram, Gajraula, J. P. Naaar, UP, India				
02	Name of designation Phone & Fa		person w	rith	 Mr. Neeraj Arora G.M. (Works) & Plant Head 05924-252830, Mob. 08449718695 05924-252348 Neeraj.arora@evonik.com 				
04	Date/Year of	of commissior	ning		May, 1992				
05		nstalled produ ach product	uction capaci	ity	Precipitated Silica & 21,000 TPA Presently operating at 16200TPA Precipitated Silicon dioxide (Amorphous) No By product				
08		ial consumed on of product))		Sodium	silicate & S	ulphu	ric acid	
09	Total Water requirement (M ³ /day)				Process			3500	KLD
					Washing			-	
						С		8 KLD)
					Others (Specify)		-	
10	0 (<u> </u>			Total			-	27.1
10	Sources of Water			Bore Well Qty of Water is 4319 m ³ /day (Avg. per day for first quarter Jan, Feb & March - 2017) – CGWA Permission – APPLIED				•	
	Separate E	eparate Energy Meter			Installed (log book copy provided)				
В	Waste Wat	ter – Generat	ion & Treatr	nen	nt:				
11	Wastewate	r generation,	(M³/dav)		As per consent Present status				
	Process eff				6449 KLD 3		3900 K	LD	
	Effluent Cl	haracteristics	5						
	Sampling locations	рН	TDS (mg/l)	S	AR	SO4- (mg/l)	F- (m	g/l)	
	Inlet	7.17	11112	27	7.7	5480	4.4	4	
	Outlet	7.64	320	6.		55	0.4	1	
	Pond	7.13	10448	34	1.6	5932	3.9)2	
	Observation	ns:							
		s industry is in			•	•		-	
	(ii)	The indus	stry generates	s eff	fluent hav	ing high To	tal Dis	solved S	Solid (TDS).
	(iii)	At the tim	e of inspecti	on t	the effluer	nt being dis	charg	ed and t	he collected
		outlet san	nple shows T	DS	of 320 m	l. Howev	er whe	en the sa	amples were
		picked-up	from the B	ada	ad river w	here the	effluen	nt is beir	na disposed
			TDS of 1128	-					3 - 1
	(;)				0				
	(iv)		mittee was d	•	•			•	-
		using aro	und 2 MLD o	of g	roundwate	er for diluti	ng of	effluent.	The dilution
		water is a	dded with an	oth	er chemic	al to reduce	e the S	SAT, whi	ch is not the
		appropria	te and acce	ptak	ole appro	ach to mee	et the	stipulate	ed norms of
			d SAR. There	•	• •			•	
		•	em and by re			•			•
		•			•	,			เลเธ อังอเษีกา.
		in no case	e effluent be	aisp	posed in a	mpient env	ironm	ent.	

8. M/S Kamakshi Papers (P) Ltd.

01		of the industry & Address:	Complete	M/S Kamakshi Papers (P) Ltd., Industrial Estate, Delhi Road, Gajraula, Post – Bhartiyagam (Amroha) U.P 244223				
02		of Contact per	son with	-	•	wal (Directo	r)	
	designa Phone	& Fax No/Email:		805790 kamaks		@gmail.cor	n	
					• •	- 3		
03 04		commissioning ry of Industry		August Medium				
04	•	d Capacity, TPA				Extended t	o 60 TF	D in September,
		,,,, , , , , , , , , , , ,		2016. (21,600 MT) (Approx.) Trial Consent enclosed.				
06	Energy	Energy required, KWH/MT			201	6-17	2015-16	6 2014-15
				17(00	975	975	
07	Status of consents & Authorization (validity)			b. Wa	ter Conse	Up to 31-12 ent: Up to 3 sation: NA		
08		t manufactured in						
	S.No.	Product (grade	/type) &			actured in I		04445
		Ву	Product	2016-17 (Up te		2015-16		2014-15
		manufactured		2016)		•		
	01	News prir	it	3741.2		6032.97		5932.02
	02	Writing	printing	1147.52	27	1187.06		671.108
09	Raw m	paper aterial used / tonne	of produc	raduat				
09				Raw Material Consumption Per tonne of Product				
	S.No.	Raw Materials 2		2016-17		2015-16		2014-15
		Waste paper		1.337		1.351	- 4 - 4 -	1.327
	01			(10tal 65	(Total 6534 TPA) (Total 9754 TPA)		54.315	(Total 8760.659 TPA)
10	Proces	s details with Mate	rial Balanc	e:		,		
		paper→ High cons er → Potcher wasl		•				
	Source			Ground Water through borewell (NOC obtained from CGWA on 21/3/2017 for 500 KLD)				C obtained from
11	Water (S.No.	Consumption & Wa	aste Water	r Generated: Water				
	5.NO.		Water		Waste			nsumption
			Consump [.] KLD	tion,	Genera KLD	ated,	KL	MT of Paper
	04							oduced
	01 04		387.9 5		411.48		12.	99
12	-	t Treatment facilitie	-	1:				
. –		Recovery System	•		ank →P	rimary clar	ifier →	aeration Tank \rightarrow
		dary clarifer → Irri	-					
	Sample Parame	e collected form E	ETP analys		results a rSS	re: BOD		COD
	Inlet of		рп 6.77		761	113		474
	Final tre	eated effluent	6.90	5	58	52		222
	Standa consen	v 1	-	1	00	30	<u></u>	-

13	04-25-2017	
E	TP sludge storage tank not managed	Outlet of Secondary clarifier
2.	 31.12.2016 The unit provided certain documents sho declared that they are using the treated wa and willing to take further water for a per declaration does not provide information different months, thereby it seems that the to utilise the treated wastewater. It is therefore submitted that the unit is not discharge of treated wastewater to nearby 	t as consent for trial run has been expired on wing agreement with the farmers, who have astewater from the Unit for agriculture purpose eriod 1st Jan to 31 Dec 2017. However, the on the area of land and quantity required in provision is more of manage rather than intent ot a ZLD unit and there is enough scope for environment, low lying area etc.
Th W ev Wa Us dis of	vaporation loss should be submitted to UPPC ater audit report issue necessary conditions se of treated water for irrigation purpose sh scharge as there is no requirement on rainy	vater reuse and fresh water consumption, B. UPPCB shall considering the finding of the

9. M/s Dairy India Private Ltd.

1.	Name of the Unit and Address	M/s Dairy India Private Ltd. Gajraula, Amroha, UP		
2.	Name of Contact person with designation Phone & Fax No/Email:	V K Arora, Head, Corporate Governance		
3.	Installed Production Capacity:	125 KLD Milk Processing		
4.	Water Consumption	180 KLD		
5.	Source of water	Ground water CGWA – Permission Awaited		
6.	Consent Status	For Water Valid up 31/12/2017 For Air valid up 31/12/2017		



ETP Samples analysis results

Sampling locations	рН	TSS (mg/l)	COD (mg/l)	BOD (mg/l)
Inlet	4.35	1700	5344	1025
Outlet	8.40	37	142	53
General discharge standards (Consented)	-	100	-	30

Observations

The unit is not meeting the stipulated norms.

The unit claim to have zero liquid discharge, through ferti-irrigation approach. Use of treated water for irrigation purpose shall not be treated as a route to achieve zero discharge as there is no requirement on rainy days and in absence of any alternate option of utilisation, the unit will be discharging to the ambient environment, in case they are operational.

Recommendation

UPPCB shall assess the water balance report of the industry and make necessary modification in the consent condition to have appropriate and feasible condition with objective to conserve ground water and save uncalled for discharge of treated effluent.

10. M/s. Kaushambi Papers Mills Pvt. Ltd.

1	Name of the Unit and Address	M/s. Kaushambi Papers Mills Pvt. Ltd. Khasra No-138, naipura Kadar, The, Dhanaura, Gajraula, Amroha, UP						
	Operational status	The unit was found non-operational.As informed by the unit, due to mechanical line burst in Pulp mill, the unit shut down around 2 AM on 25/4/2017 i.e. on the same day of inspection.						
	the unit	he campus, it is piled on the land claimed to be owned by and was found out side of the premisses also.						
	Recommendations: The unit shall manage the litter and s action plan with time target for st	scattered solid waste in proper and secured system. A proper orage in a secured land fill /or any acceptable disposal nitted by the units to UPPCB, before it is allowed to operate.						

Units visited by the Officers of CPCB, UPPCB, MoWR on 01/05/2017

7. TEVA API Limited, Gajraula

- 1. The Unit was operational during visit.
- 2. The Unit has two bore well with water meter installed at a distance of 200m metre from the bore well.
- 3. The Unit has valid consent under Water/Air and HW Rules valid upto 31.12.2017.
- 4. STP. There are two STPs of 100 KLD (under stabilisation) and 60 KLD (operational). The STP is receiving wastewater from colony as well as domestic sources of industrial area. However, there is no flow measurement device at the inlet & outlet to measure the quantity of effluent generation. STP treated effluent is partially fed in gardening and partially mixed with ETP treated waste prior polishing RO for further treatment.
- 5. ETP. The ETP was operational and comprise of activated sludge process followed RO treatment and concentration and incineration of RO Reject through MEE/ MVRE and ATFD / Spray Dryer. ETP treated effluent (final RO permeate) is used as make up water for cooling tower. Sample of RO permeate was taken for analysis and result is awaited.
- 6. Dedicated energy meter was installed for the ETP electrical consumption, however the energy meter was installed far from ETP, therefore needs to install within the ETP.
- 7. During inspection no discharge was found outside the premises. The Unit should not provide multiple outlet for the storm water drain. The 3 outlets for storm water drain was regulated by valve and pumps which was found locked during visit. The Unit informed that the pumps are used to take first '10 minutes' storm water into the ETP. However, the records of operation of valves and pumps are no available.
- 8. The Unit has installed real-time OCEMS and connected to CPCB server and Calibrated by supplier/forbes Marshell. During visit it was operational.
- 9. Analytical results will be ready by 05.05.2017 and will be processed

8. M/s Umang Dairy Ltd, Gajraula

- 1. The Unit was closed during visit.
- 2. The Unit as consent valid upto 31.12.2017 under Water/Air and HW Rules.
- 3. The Unit has 3 bore wells for ground water abstraction and has installed water meter with logbooks.
- 4. Sewage treatment. The Unit has septic tank for the colony and industrial sewage wastewater.
- 5. ETP is based on ASP process followed by RO/UF treatment process.

- 6. ETP was operational for stabilising the biomass in aeration tank so that the plant can handle raw effluent at any time.
- 7. The RO Reject (262 KLD) is diluted with freshwater (500 KLD) and mixed effluent is used for planation/land application (10 acres). The unit shall discontinue the process of dilution of RO reject for disposal of RO reject.
- 8. CGWA permission under process and RO, CGWA has recommended for NOC.
- 9. Dedicated energy meter was installed for the ETP.
- 10. Flowmeter ware installed at the inlet & outlet of ETP.
- 11. Camera and flowmeter were installed at the ETP, however the Unit is not a ZLD plant, therefore needs to install real-time OCEMS for pH, BOD, COD, TSS parameters as per the CPCBs directions.

12. Closed.

9. M/s Coral News Print Ltd., Gajraula, UP

- The unit was Closed at the time of inspection. As informed by industry the production was stopped since 29th April, 2017.
- 2. The Unit Consent under Water & Air Act expired on 31.12.2016, however has applied for the renewal.
- No 'Authorization' has been obtained under Hazardous Waste Management Rule from UPPCB for disposal of ETP sludge & used oil etc.
- 4. The aeration tank of ETP was found operational to stabilize the biomass so that the plant can handle effluent at any time.
- 5. The Unit have only hill screen to recover the fiber reaching the ETP.
- 6. Sign of overflow from sludge drying bed observed, capacity of drying beds required to be increased.
- 7. The sludge press machine is not maintained properly and reflects that it is not being used for past one month or so.
- No tertiary treatment (Sand filter/ multi-media filter/ACF) facility found in ETP. As per the Charter programme (pulp & paper) in Ganga basin States, industries are required to install tertiary treatment system.
- The Unit has installed is 'V' shaped Notch (flow measurement) at the inlet of ETP & online effluent monitoring system (OCEMS) at final discharge line and connected to CPCB server.
- 10. The location of OCEMS & placement & one of its probe seems improper as the probe placed just above the bottom of a pit on the outlet drain. After the OCEMS also, the outlet drains receives water along with fly-ash from boiler area.

- 11. A Sample from treated water holding tank was taken for analysis and to assess the need for tertiary treatment and results is awaited.
- 12. The Unit needs to conduct ground water monitoring to know the impact of effluent through land application.
- 13. Closed.

Annexure –III



	S. No.	1	2	3	4	5	6	7	8	9	10
Sp	Name of the Units/ Specific information required		M/s. Jubiliant Agri & Consumer Products Ltd. (Fertilizer Unit) Bharatigram, Gajraula, District – Amroha,	M/s. Jubiliant Life Sciences Ltd. (Chemical Unit I), Bharatigram, Gajraula, District – Amroha,	M/s. Jubiliant Life Sciences Ltd. (Chemical Unit II). Bharatigram, Gajraula, District – Amroha,	M/s Jubiliant Life Sciences Ltd. (Distillery Unit), Bharatigram, Gajraula, District – Amroha,	M/s. Jubiliant Agri & Consumer Products Ltd. (Polymer unit) Bharatigram, Gajraula.	M/s Dairy India Private Ltd. Gajraula, Amroha,	M/s Insilco Ltd., A-5, UPSIDC Industrial Area, Gajraula,	M/s. Kaushambi Papers Mills Pvt. Ltd.Khasra No-138, naipura Kadar, Dhanaura, Gajraula,	M/s. Kamakshi Papers Pvt. Ltd. Gajraula
1	What is the source of water used by the industry and its quantity, availability, water meters etc.?	Ground water (24 KLD)	Ground Water Water meter installed (1400 KLD)	Ground Water Water meter installed (2300 KLD)	Ground Water Water meter installed (2600 KLD)	Ground Water Industrial- (3000 KLD)	Ground Water (250 KLD)	Ground water	Ground Water 4319 m3/day	Ground Water	Ground Water (500 KLD)
2	Whether the unit are ZLD, ZLD means they are not discharging any effluent, either on the land or in the waterbody or at any other place for that matter. They should be able to either not discharge a drop of liquid or recycle the same entirely without releasing thereto any effluent.	Not ZLD	ZLD unit, there is no ETP processing water is being recycled and reused (Non- operational)	Treated effluent being used for horticulture (Unit mentioned)	Treated effluent being used for horticulture (Unit mentioned)	ZLD unit Recycle and reused water	Not ZLD Recycle and reused water	Not ZLD Use for irrigation	Not ZLD unit Having Consent to discharge	Not ZLD (Operational)	Not ZLD Recycle and reused
3	Whether adequate ETPs have been provided and were found to be functional or not at the time of inspection, including its adequacy;	ETP Not available	Not ETP provided	Chemical ETP found operational (Unit 1 & Polymer)	Incilater	Not applicable	Chemical ETP found operational (Unit 1 & Polymer)	ETP operation al	Yes ETP is adequate & found operational (Performance)	ETP found operational	ETP found operational

Compiled status of specific information as desired Hon'ble NGT of 10 industrial units

	S. No.	1	2	3	4	5	6	7	8	9	10
Name of the Units/ Specific information required		M/s ASP Sealing Product Ltd., Gajraula	M/s. Jubiliant Agri & Consumer Products Ltd. (Fertilizer Unit) Bharatigram, Gajraula, District – Amroha,	M/s. Jubiliant Life Sciences Ltd. (Chemical Unit I), Bharatigram, Gajraula, District – Amroha,	M/s. Jubiliant Life Sciences Ltd. (Chemical Unit II). Bharatigram, Gajraula, District – Amroha,	M/s Jubiliant Life Sciences Ltd. (Distillery Unit), Bharatigram, Gajraula, District – Amroha,	M/s. Jubiliant Agri & Consumer Products Ltd. (Polymer unit) Bharatigram, Gajraula.	M/s Dairy India Private Ltd. Gajraula, Amroha,	M/s Insilco Ltd., A-5, UPSIDC Industrial Area, Gajraula,	M/s. Kaushambi Papers Mills Pvt. Ltd.Khasra No-138, naipura Kadar, Dhanaura, Gajraula,	M/s. Kamakshi Papers Pvt. Ltd. Gajraula
	performance; and its records thereof.										
4	The Committee would collect effluent samples at the inlet and outlet of the ETP and at the point of discharge, at the ultimate end.	From holding tank	Not applicable	Sample collected	Sample collected	Sample not Collected	Sample collected	Sample collected	Sample collected	Industry was closed at the time of inspection	Sample collected
5	Whether there is separate provision of Energy Meter for the ETP/ZLD.	Not aplicable	Not applicable	Yes	-	Yes		Yes	Yes		Yes
6	Whether there are online monitoring system installed and operative and if so connected to which authority, calibration/validation thereof;	Not installed	Common OCEMS installed	-	-	Yes, OCEMS installed	Yes, OCEMS installed	-	OCEMS Not installed	Yes, OCEMS installed	Yes, OCEMS installed
7	Whether water flow- meter have been installed.	yes	Yes	Installed at outlet of ETP	Installed at outlet of ETP	Yes	Yes		Provided V- Notch & Calibration chart	N/A	Yes

	S. No.	1	2	3	4	5	6	7	8	9	10
Name of the Units/ Specific information required		M/s ASP Sealing Product Ltd., Gajraula	M/s. Jubiliant Agri & Consumer Products Ltd. (Fertilizer Unit) Bharatigram, Gajraula, District – Amroha,	M/s. Jubiliant Life Sciences Ltd. (Chemical Unit I), Bharatigram, Gajraula, District – Amroha,	M/s. Jubiliant Life Sciences Ltd. (Chemical Unit II). Bharatigram, Gajraula, District – Amroha,	M/s Jubiliant Life Sciences Ltd. (Distillery Unit), Bharatigram, Gajraula, District – Amroha,	M/s. Jubiliant Agri & Consumer Products Ltd. (Polymer unit) Bharatigram, Gajraula.	M/s Dairy India Private Ltd. Gajraula, Amroha,	M/s Insilco Ltd., A-5, UPSIDC Industrial Area, Gajraula,	M/s. Kaushambi Papers Mills Pvt. Ltd.Khasra No-138, naipura Kadar, Dhanaura, Gajraula,	M/s. Kamakshi Papers Pvt. Ltd. Gajraula
8	The inspection team shall also analyse the effluent quality at the end of the drain as well as at the point where Mahua starts.		Team could not visit due to time constraint								
9	The samples shall also be collected from the drain nearest to the industrial unit.		Sample was collected from the Bagad River								
10	The committee may also examine the Ambient Air Quality in that area.		Team could not visit due to time constraint								
11	Whether any of the industries have a by- pass mechanism provided in the factory, even if it has been now closed or groundwater injection system.	arr a Could not found (CP sh n							By-pass arrangement available (CPCB issued show cause notice on 13.01.2017)		
12	The inspection shall also verify the agriculture areas used for disposal of effluent of the industries.	Visited & sample collected									
