

**BEFORE THE NATIONAL GREEN TRIBUNAL,  
PRINCIPAL BENCH, NEW DELHI**

Original Application No. 1325/2024

In the matter of:

Public action committee & others

...Applicant

Vs.

Union of India & Others.

...Respondents

**Index**

<b>Sr. No.</b>	<b>Particular's</b>	<b>Page No.</b>
<b>1.</b>	<b>Reply by way of affidavit on behalf of Respondent no. 2</b> Central Pollution Control Board (CPCB) in compliance to Hon'ble NGT order dated 29.11.2024 in O.A No. 1325/2024.	
<b>2.</b>	<b>Annexure - I</b> A copy of direction dated 12.08.2024 issued by CPCB to Punjab Pollution Control Board.	
<b>3.</b>	<b>Annexure – II</b> A copy of Analytical Results of monitoring of Budah Nallah and River Sutlej.	



**Filed by Adv. Rajkumar  
(On behalf on Central Pollution Control Board)**

**Place: Delhi**

**Dated: 19.03.2025**

**BEFORE THE NATIONAL GREEN TRIBUNAL,  
PRINCIPAL BENCH, NEW DELHI**

Original Application No. 1325/2024

In the matter of:

**Public action committee & others** ...Applicant

**VERSUS**

**Union of India & Others.** ...Respondents

**Reply by way of affidavit on behalf of Central Pollution Control Board  
i.e. Respondent 2**

**AFFIDAVIT**

I, **Amit R Thakkar** working as Scientist 'E' in Central Pollution Control Board (herein after referred as CPCB), Parivesh Bhawan, East Arjun Nagar, Delhi, the Respondent No.2 in the above matter, do hereby solemnly affirm, declare on oath and state as under: -

- A.** That, I am well conversant with the facts and circumstances of the present case on the basis of the information derived from the official records, and hence, I sign and swear this affidavit on behalf of the Respondent No.2, CPCB.
- B.** That, CPCB is a statutory Board constituted under Section 3 of The Water (Prevention and Control of Pollution) Act, 1974. It performs the functions 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.



- C.** That the OA No. 1325 of 2024 is regarding the allegation of discharging the treated effluent from the 50 MLD Common Effluent Treatment Plant (CETP) into Budha Nallah by the Punjab Dyers Association (Respondent No. 4) despite the directions contained in the order dated 25.09.2024 passed by the Punjab Pollution Control Board (PPCB), also referring to Hon'ble Supreme Court's order dated 22.02.2017 which prohibits discharge into Budha Dariya. It is also mentioned that Environmental Clearance (EC) granted to the CETP dated 03.05.2013 (Clause 5(ii)) mandates "no discharge into Buddha Nallah."
- D.** That a reference has also been made to the directions issued by CPCB on 12.08.2024 under Section 18(1) (b) of the Water Act, 1974, to Punjab Pollution Control Board (PPCB) directing to take appropriate action including imposing environmental compensation and to ensure compliance with prescribed standards and disposal conditions. The original applicant seeks retrospective imposition of environmental compensation (EC) from 22.02.2020 due to continuous illegal discharge.
- E.** That the Central Pollution Control Board is the respondent No. 2 in this matter and Hon'ble NGT vide its order dated 29.11.2024 has directed the respondents to file their reply by the way of affidavit, thereby the reply is made in succeeding paragraphs.
- F.** That, it is humbly prayed that the reply on merit made by answering respondent herein to paragraphs of the OA may kindly be considered as reply against paragraphs under facts in brief and Grounds of the application in the OA too.



**REPLY ON MERIT: -**

1. That no comments are offered by the answering respondent herein over the averments made in para 1 & 2 of the OA being introductory in nature.
  
2. That with regard to the contents of para No. 3 and 4, the applicants have referred to the Environmental Clearance (EC) dated 03-05-2013 granted to M/s Punjab Dyers Association, for the construction of a Common Effluent Treatment Plant (CETP) with a capacity of 117 MLD on 32 acres of land at Village Jamalpur Awana, Panchayat Jamalpur Awana, Taluk Ludhiana East, Ludhiana District and compliance of the EC conditions. It is submitted by the answering respondent/R-2 that the subject EC has been granted by MoEF&CC which is a matter of record and that the Central Pollution Control Board (CPCB) inspected the following CETPs on 22.04.2024 and 23.04.2024:
  - i. CETP 40 MLD Near Central Jail, Tajpur Road (Focal Point Module), Ludhiana (Punjab).
  - ii. CETP 50 MLD, Near Central Jail, Tajpur Road (Focal Point Module), Ludhiana (Punjab).
  - iii. CETP 15 MLD, Bahadur Ke Road, District Ludhiana (Punjab).
  - iv. CETP 500 KLD (for Electroplating industries), Phase-VIII, Focal Point Ludhiana (Punjab).

It submitted by the answering respondent that based on the inspection, it was observed that two CETPs viz., 40 MLD, 50 MLD, were operational based on the EC dated 03.05.2013. Separate EC for 15 MLD CETP and 500 KLD CETP was obtained. **The CETPs 40 MLD, 50 MLD and 15 MLD was reportedly discharging the treated wastewater into the Buddha Nallah. However, 500 KLD**



**CETP is maintaining ZLD. It is further submitted by the R-2 that in** this regard, the CPCB vide letter dated 12.08.2024 issued common direction u/s 18(1)(b) of the Water (Prevention and Control of Pollution) Act 1974, to Punjab Pollution Control Board (PPCB) against the non-complying CETPs to ensure compliance of environmental norms and conditions prescribed by MoEF&CC in Environmental Clearance (EC) issued under Environmental Impact Assessment Notification, 2006.

A copy of the direction dated 12-08-2024 u/s 18(1)(b) of Water Act is annexed herewith as **ANNEXURE I**.

3. That, no comments are offered by the answering respondent herein over the averments made in para 11 & 12 of the OA (mentioned erroneously after para 4 of the OA) being matter of records.
4. That no comments are offered by the answering respondent herein over the averments made in para No.5 (**as numbered in the petition**).
5. That no comments are offered by the answering respondent herein over the averments made in para No.6 (**as numbered in the petition**), wherein it is alleged by the applicants that “the Project Proponent has been claiming that the Punjab Government has approved the project of irrigation of land by providing conveyance system along with spreading awareness to the farmers and it is also alleged that, no such notification has been issued by the Government of Punjab under the provisions of IMO Para No. 4.2 read with Canal & Drainage Act 8 of 1873.” The applicants have also referred to the Para 4.2 of the Irrigation Module as follows:



*“No Government Channel should be abandoned or another constructed or extended without the prior approval of the Chief Engineer whatever the financial powers of the Local Officer may be in regard to them.”*

6. That no comments are offered by the answering respondent herein over the averments made in para No.7 (**as numbered in the petition**) wherein it is alleged that “one Estimate was prepared by the Canal Officer (Respondent No.7) but from Para 4.2 of IMO, it is clear that the Canal Officer has no authority to finalise the project without prior approval from the Chief Engineer of Water Resources Department.” It is further mentioned by the applicant that “keeping in view of the above, it is clear that the claim of Project Proponent regarding discharge of treated water for irrigation is false. Further, since farmers have not been made aware of such project and the farmers and other stakeholders are not ready to allow such proposal of irrigation using treated water, therefore, keeping in view of Para ii (Introduction of Proposed Distributary), if the farmers refuse to consume the said water, the onus of this will be entirely of the department responsible for carrying out the operation/supervision of the treatment plant. Thus, it is sole responsibility of Project Proponent i.e. Respondent No. 4 to handle treated water in scientific manner”.

7. That the averments made in Para No. 8 (**as numbered in the petition**) of the Original Application, it is alleged by the applicants that “the impugned CETP of capacity 50 MLD started operating in the year 2022 but without fulfilling the specific condition of Clause No. 5(ii) of Environment Clearance and continued to discharge the



treated effluent (so called) into Buddha Dariya (now known as Nallah) illegally and in active connivance & collusion with the officials of Punjab Pollution Control Board.” The applicant further submitted that “the Budha Nallah meets River Satluj at Village Wallipur and River Satluj is source of drinking water & irrigations purposed for millions of citizens residing in South Punjab and many districts of Rajasthan. Due to discharge of effluent by the impugned CETP, the citizens, cattle, wildlife, aquatic life etc. are forced to drink/use/live-in such contaminated water since many decades.” In this regard, it is to submit that CPCB has carried out water quality monitoring of Budha Nallah and river Sutlej (At upstream and downstream of Budha Nallah) on 25.12.2024. The analytical results of monitoring of Budha Nallah and River Sutlej are attached as Annexure. The findings based on the analytical results are as follows:

- The analytical results of sample collected on 25.12.2024 reveals that the water quality of Buddha Nallah at Walipur was not meeting with the General standards for discharge as per Schedule-VI of the Environmental (Protection) Rules, 1986 w.r.t BOD, COD and TSS due to discharges from STPs, CETPs dairy waste and others.
- Based on the sampling carried out on 25.12.2024, water quality of River Sutlej before confluence of Buddha Nallah was meeting the primary water quality criteria for outdoor bathing notified by Ministry of Environment, Forest and Climate Change vide notification dated 25th September 2000. However, the water quality of River Sutlej after the confluence of Buddha Nallah at Walipur was not meeting the



primary water quality criteria for outdoor bathing w.r.t BOD, Fecal Coliform and Fecal Streptococci.

8. The averments in Para 9 & 10 (as numbered in the petition) allege severe water pollution from the discharge of treated effluent by dyeing industries into Budha Nallah, allegedly causing health hazards like cancer and gastrointestinal diseases. The averment highlights the State's constitutional duty to maintain contamination-free water sources under Article 21 and calls for strict enforcement and accountability. Further, a reference is made to Dr. Ajit Sood's efforts in treating affected villagers has also been made. It is also alleged by the applicants that the CETP of Respondent No. 4 has never treated the effluent as per Environment Norms and same was caught red-handed by the CPCB who also reported that OCEMS installed by Respondent No. 4 are required to be calibrated." In this regard, it is submitted herein that the Central Pollution Control Board (CPCB) inspected the CETP during 22.04.2024 and 23.04.2024 and CPCB vide letter dated 12.08.2024 issued common direction u/s 18(1)(b) of the Water (Prevention and Control of Pollution) Act 1974 for 04 CETPs, to Punjab Pollution Control Board (PPCB) against the non-complying CETPs to ensure compliance of environmental norms and conditions prescribed by MoEF&CC in Environmental Clearance (EC) issued under Environmental Impact Assessment Notification, 2006. A copy of the direction has already been annexed as **Annexure I**.
9. That no comments are offered by the answering respondent herein over the averments made in para No.11 of the Original Application wherein allegation are made by the applicant about the working of Punjab Pollution Control Board.





10. That the averments made in Paragraph No. 12 of the Original Application are regarding allegation of the applicant that the Respondent No. 4 is discharging polluted water into Budha Nallah by going against the mandatory condition of EC and has committed an offence under the Section 24 (1) read with Section 43, 44, 47 & 48 of the Water (Prevention & Control of Pollution) Act, 1974. In this regard it is submitted that vide letter dated 12.08.2024 CPCB had issued common direction u/s 18(1)(b) of the Water (Prevention and Control of Pollution) Act 1974, to Punjab Pollution Control Board (PPCB) against the non-complying CETPs to ensure compliance of environmental norms and conditions prescribed by MoEF&CC in EC issued under Environmental Impact Assessment Notification, 2006. A copy of the direction has already been annexed as **Annexure I**.

11. That no comments are offered by the answering respondent herein over the averments made in para No. 13 of the Original Application being matter of records wherein the applicant has produced the Section 17 and Section 15 of the Environment Protection Act 1986.

12. That no comments are offered by the answering respondent herein over the averments made in para No. 14 of the Original Application wherein delay in construction of CETP has been alleged.

13. That with regard to the averments made in Para No.15, 16 & 17 of the Original Application, it is humbly submitted that CPCB inspected the following CETPs during 22.04.2024 and 23.04.2024:



(1) CETP 40 MLD Near Central Jail, Tajpur Road (Focal Point Module), Ludhiana (Punjab);

(2) CETP 50 MLD, Near Central Jail, Tajpur Road (Focal Point Module), Ludhiana (Punjab);

(3) CETP 15 MLD, Bahadur Ke Road, District Ludhiana (Punjab);

(4) CETP 500 KLD (for Electroplating industries), Phase-VIII, Focal Point Ludhiana (Punjab).

Based on the inspection, it was observed that the CETPs viz., 40 MLD, 50 MLD, 15 MLD was discharging the treated wastewater into the Buddha Nallah. However, 500 KLD CETP is maintaining ZLD. In this regard, the CPCB vide letter dated 12.08.2024 issued common direction u/s 18(1)(b) of the Water (Prevention and Control of Pollution) Act 1974, to Punjab Pollution Control Board (PPCB) against the non-complying CETPs to ensure compliance of environmental norms and conditions prescribed by MoEF&CC in Environmental Clearance (EC) issued under Environmental Impact Assessment Notification, 2006. A copy of the direction has already been annexed as **Annexure I**.

14. That averments made in para No.18 of the Original Application are about PPCB directions dated 25.09.2024 for closure of outlets and it is alleged that such act by PPCB remained on papers only as the discharge of effluent has alleged not stopped till date and it is continuously violating the Environment Clearance specific conditions since year 2012-13. In this regard, it is to humbly submit that the directions was issued by PPCB subsequent to the issuance of directions dated 12.08.2024 under section 18(1)(b) of the Water (Prevention and Control of Pollution) Act 1974, to Punjab Pollution Control Board (PPCB).



15. That no comments are offered by the answering respondent herein over the averments made in para No. 19, wherein a reference is made to a complaint made by the applicant under the provisions of Bhartiya Nyaya Sahinta, Water Act as well as Environment Act to the Police Station Tibba as well as the Police Commissioner of Ludhiana on 30-08-2024 to register FIR and investigate into the matter.
16. That no comments are offered by the answering respondent herein over the averments made in para No. 20 of the Original Application wherein reference is made to the representation sent by the applicants on 30-09-2024 to the Chief Minister of Punjab along with the Chief Secretary of Punjab, DGP Punjab and Chairman of Punjab Pollution Control Board against violation of Fundamental Rights of Citizens residing in Punjab by Dyeing Industry and PPCB mentioning non-action of orders of CPCB by PPCB and it is stated by the applicant that no reply has been received from them till date.
17. That the averments made in Para No. 21 of the Original Application are regarding Appeals (Appeal No. 40 of 2024) filed before this Hon'ble Tribunal, is a matter of record and hence requires no comments.
18. That, averments made in para No. 22 and Para No. 23 of the Original Application, are about discharge of effluent by Punjab Dyers Association is still in continuation and further EC be imposed and the project proponent has been polluting the buddha dariya which is source of water drinking and irrigation for millions of citizens and




cattle in Punjab & Rajasthan. In this regard, submissions made in para 11 above are reiterated and are not repeated herein for the sake of brevity.

19. That, the answering respondent craves leave of the Hon'ble Tribunal to file additional replies in the future, if required.

20. That, in light of the above submissions, it is respectfully submitted that this answering respondent, i.e., CPCB, shall abide by any order(s) or direction(s) passed by this Hon'ble Tribunal in this Original Application.




  
 अभित् ~~DE PONENT~~ Amit R. Thakkar  
 वैज्ञानिक 'ई' / Scientist 'E'  
 केंद्रीय प्रदूषण नियंत्रण बोर्ड  
 Central Pollution Control Board  
 (पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय, भारत सरकार)  
 (M/o Environment, Forest & Climate Change, Govt. of India)  
 परिवेश भवन, पूर्वी अर्जुन नगर, दिल्ली-110032  
 Parivesh Bhawan, East Arjun Nagar, Delhi-110032

### VERIFICATION

Verified at Delhi on this 19 MAR 2025..... that the contents of the above reply are correct and true on the basis of the records of the case as mentioned in the day-to-day affairs of the CPCB. Nothing has been concealed therefrom or mis- stated.

ATTESTED  
  
 NOTARY PUBLIC DELHI (INDIA)

19 MAR 2025

  
 अभित् ~~DE PONENT~~ Amit R. Thakkar  
 वैज्ञानिक 'ई' / Scientist 'E'  
 केंद्रीय प्रदूषण नियंत्रण बोर्ड  
 Central Pollution Control Board  
 (पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय, भारत सरकार)  
 (M/o Environment, Forest & Climate Change, Govt. of India)  
 परिवेश भवन, पूर्वी अर्जुन नगर, दिल्ली-110032  
 Parivesh Bhawan, East Arjun Nagar, Delhi-110032

233

Anexure- I



केन्द्रीय प्रदूषण नियंत्रण बोर्ड  
CENTRAL POLLUTION CONTROL BOARD  
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय, भारत सरकार  
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE, GOVT. OF INDIA

Speed Post

CPCB/IPC-VII/CETP-Ludhiana/ ३५७१

Dated: 12.08.2024

To

The Member Secretary  
Punjab Pollution Control Board  
Vatavaran Bhawan, Nabha Road  
Patiala Punjab

**Subject:** Directions under section 18(1)(b) of the Water (Prevention and Control of Pollution) Act, 1974 regarding non-compliance status of four CETPs namely A. 40 MLD CETP- near Central Jail, Tajpur Road (Focal Point Module), Ludhiana, Punjab, B. 50 MLD CETP Tajpur-Rahon Road Cluster, Ludhiana, near Central Jail, Tajpur Road, Ludhiana, Punjab, C. 15 MLD CETP- Bahadurke Road, Ludhiana, Punjab and D. 500 KLD CETP, Plot No. D-260-261, Phase-VIII, Focal Point, Ludhiana, Punjab.

WHEREAS, amongst others, under Section 17 of the Water (Prevention & Control of Pollution) Act, 1974, one of the functions of the State Pollution Control Board (SPCB), (or Pollution Control Committee for Union Territories) constituted under the Water (Prevention & Control of Pollution) Act, 1974 is to plan a comprehensive programme for prevention, control or abatement of pollution of streams and wells located in the State and to secure the execution therefore; and

WHEREAS, amongst others, under Section 16 of the Water (Prevention & Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981, one of the functions of the Central Pollution Control Board (CPCB), constituted under the Water (Prevention & Control of Pollution) Act, 1974 is to coordinate activities of the State Pollution Control Boards and Pollution Control Committees and to provide technical assistance and guidance to SPCBs/PCCs; and

WHEREAS, amongst others, under Section 16 of the Water (Prevention & Control of Pollution) Act, 1974, one of the functions of the Central Pollution Control Board (CPCB), is to promote cleanliness of streams and wells in different areas of the State; and

WHEREAS, the Central Government has notified the standards for discharge of environmental pollutants from various categories of industries, Common Effluent Treatment Plants (CETPs) and Sewage Treatment Plants (STPs) under the Environment (Protection) Act, 1986 and the rules framed there under; and

केन्द्रीय प्रदूषण नियंत्रण बोर्ड

निर्गत

दिनांक 12/08/24

o/c

1

'परिवेश भवन' पूर्वी अर्जुन नगर, दिल्ली-110032

Parivesh Bhawan, East Arjun Nagar, New Delhi - 110032

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

**WHEREAS**, there is a need to inculcate the habit of self-monitoring within the CETPs for complying with the prescribed standards and this can be achieved by installing Online Continuous Effluent Monitoring System (OCEMS); and

**WHEREAS**, four CETPs namely (i) CETP - 40 MLD near Central Jail, Tajpur Road (Focal Point Module), Ludhiana, Punjab, (ii) CETP - 50 MLD Tajpur-Rahon Road Cluster, Ludhiana, near Central Jail, Tajpur Road, Ludhiana, Punjab, (iii) CETP - 15 MLD Bahadurke Road, Ludhiana, Punjab and (iv) CETP - 500 KLD CETP, Plot No. D-260-261, Phase-VIII, Focal Point, Ludhiana, Punjab were inspected by CPCB officials along with officials of Punjab PCB during 22.04.2024 and 23.04.2024 based on the communication of the Central Monitoring Committee (CMC) with CPCB. Following major observations were made:

**A. CETP - 40 MLD, near Central Jail, Tajpur Road (Focal Point Module), Ludhiana, Punjab (herein after referred as CETP):**

- I. During the visit on 22.04.2024, the CETP was found operational with the flow rate of 29 MLD. The CETP receives effluent through dedicated underground pipeline and the treatment is based on Sequential Batch Reactor (SBR) technology. It was informed that the CETP is discharging the treated effluent into Budha Nallah (which meets River Sutlej) through underground pipeline from CETP. However, as per the Environmental Clearance (EC) issued by MoEF&CC to the CETP dated 03.05.2013, "the treated wastewater will be used for irrigation" and it is also mentioned in the special terms & conditions that, "*There shall be no discharge into Budha Nallah*".
- II. The consent under the Air Act, 1981 is valid upto 29.12.2024 and the Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 is valid upto 19.12.2024 for the operation of 40 MLD CETP. However, the consent under the Water Act, 1974 was valid till 15.05.2023. The CETP has applied for renewal of consent to PPCB on 07.09.2023.
- III. It was reported that 72 Dyeing and Printing units have obtained membership from CETP. It was also informed by the CETP operator that inlet norms for CETP is not prescribed in the consent.
- IV. Grab samples were collected from the CETP during monitoring. The analysis result of samples collected from CETP outlet reveals that BOD:54 mg/l (Standard: 30 mg/l), COD:262 mg/l (Standard:250 mg/l), Chloride:2284 mg/l (Standard: 1000 mg/l) and Sulphide:2.4 mg/L (Standard: 2 mg/l) exceeds the notified effluent discharge standards for CETP. Remaining monitored parameters are within the prescribed standards.

- V. Grab sample were also collected from the Sequential Batch Reactor (SBR) tank for MLSS & MLVSS. The analysis result reveals that the concentration of MLSS: 4661 mg/l (Designed range: 5000-7000 mg/l) and concentration of MLVSS: 3000 mg/l (Designed range: 3500-4200 mg/l) are less than the designed range, which indicates the poor operation of the SBR.
- VI. The CETP has installed Online Continuous Effluent Monitoring System (OCEMS) at the final outlet of treated effluent for the parameters- pH, TSS, COD, BOD with connectivity to PPCB & CPCB servers. During the visit, the OCEMS was found operational and variation in OCEMS reading compared with the monitored results was also reported which indicates the improper working / validation / calibration of OCEMS system.
- VII. The CETP has provided sludge storage facility and obtained membership from M/s Re-sustainability Limited (M/s Ramky Enviro Engineers Limited). The CETP had disposed 3517.235 MT sludge (as per the log book records) during the year 2023-24.
- B. CETP - 50 MLD, Tajpur-Rahon Road Cluster, Ludhiana, near Central Jail, Tajpur Road, Ludhiana, Punjab.**
- I. During the visit on 22.04.2024, the CETP was found operational with the flow rate of 46 MLD. The CETP receives effluent through dedicated underground pipeline and the treatment is based on Sequential Batch Reactor (SBR) technology. It was informed that as per the consent, the CETP is permitted to discharge the treated effluent into Budha Nallah (which meets River Sutlej) through underground pipeline from CETP. However, as per the EC issued by MoEF&CC to the CETP dated 03.05.2013, "the treated wastewater will be used for irrigation" and it is also mentioned in the special terms & conditions that, "*There shall be no discharge into Budha Nallah*".
- II. The consent under the Air Act, 1981 is valid upto 31.03.2026 for the operation of 50 MLD CETP. However, the Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 was valid till 04.12.2023 and the consent under the Water Act, 1974 was valid till 22.08.2023. The CETP has applied for renewal of consent and authorization to PPCB on 31.08.2023.
- III. It was reported that 110 Dyeing and Printing units have obtained membership from CETP. It was also informed by the CETP operator that inlet norms for CETP is not prescribed in the consent.
- IV. Grab samples were collected from the CETP during monitoring. The analysis result of samples collected from CETP outlet reveals that BOD: 128 mg/l (Standard: 30

mg/l), COD: 382 mg/l (Standard: 250 mg/l) and Chloride: 1713 mg/l (Standard: 1000 mg/l) exceeds the notified effluent discharge standards for CETP. Remaining monitored parameters are within the prescribed standards.

- V. Grab sample were also collected from the Sequential Batch Reactor (SBR) tank for MLSS & MLVSS. The analysis result reveals that the concentration of MLSS: 300 mg/l (Designed value: 5000 mg/l) and concentration of MLVSS: 215 mg/l (Designed value: 4000 mg/l) are less than the designed values, which indicates the poor operation of the SBR.
- VI. The CETP has installed Online Continuous Effluent Monitoring System (OCEMS) at the final outlet of treated wastewater for the parameters- pH, TSS, COD, BOD with connectivity to PPCB & CPCB servers. During the visit, the OCEMS was found operational and variation in OCEMS reading compared with the monitored results was also reported which indicates the improper working / validation / calibration of OCEMS system.
- VII. During the visit, it was observed that the CETP has provided sludge storage facility and obtained membership from M/s Re-sustainability Limited (M/s Ramky Enviro Engineers Limited) for disposal of sludge. The CETP had disposed 1597.20 MT sludge during the year 2023-24 through TSDF and further, as per log book records, about 173 MT was stored in the premises.

#### C. CETP - 15 MLD CETP- Bahadurke Road, Ludhiana, Punjab.

- I. During the visit on 22.04.2024, the CETP was found operational with the flow rate of 11.26 MLD. The CETP receives effluent through dedicated underground pipeline and the treatment is based on Sequential Batch Reactor (SBR) technology. It was informed that the CETP is discharging the treated effluent into Budha Nallah (which meets River Sutlej) through underground pipeline from the CETP. However, as per EC issued by MoEF&CC on 08.12.2014, the CETP is required to establish a Zero Liquid Discharge system.
- II. The consent under the Air Act, 1981 is valid upto 31.03.2025 for the operation of 15 MLD CETP. However, the consent under the Water Act, 1974 was valid till 04.01.2023 and the Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 was valid till 04.10.2022 for which the CETP has applied for renewal to PPCB.
- III. It was reported that 36 Dyeing/Printing/washing units have obtained membership from CETP and connected to the CETP at the time of visit. It was also informed by the CETP operator that inlet norms for CETP is not prescribed in the consent.



- IV. Grab samples were collected from the CETP during monitoring. The analysis results of sample collected from CETP outlet reveals that BOD: 243 mg/l (Standard: 30 mg/l), COD: 587 mg/l (Standard: 250 mg/l), Chloride: 1904 mg/l (Standard: 1000 mg/l) and Sulphide: 16 mg/l (Standard: 2 mg/l) exceeds the notified effluent discharge standards for CETP. Remaining monitored parameters are within the prescribed standards.
- V. Grab samples were collected from the Sequential Batch Reactor (SBR) tank for MLSS & MLVSS. The sample analysis results reveals that the concentration of MLSS: 2639 mg/l (Designed value: 4840 mg/l) and concentration MLVSS: 1179 mg/l (Designed value: 3872 mg/l) are less than the designed values, which indicates the poor operation of the SBR.
- VI. The CETP has installed Online Continuous Effluent Monitoring System (OCEMS) at the final outlet of treated effluent for the parameters- pH, TSS, COD, BOD with connectivity to PPCB & CPCB servers. During the visit, the OCEMS was found operational and variation in OCEMS reading compared with the monitored results was also reported which indicates the improper working / validation / calibration of OCEMS system.
- VII. During the visit, it was observed that the CETP has provided sludge storage facility and obtained membership from M/s Re-sustainability Limited (M/s Ramky Enviro Engineers Limited) for disposal of sludge. The CETP had disposed 602.685 MT sludge during the period of 02.04.2023 to 31.03.2024, through TSDF.
- D. CETP - 500 KLD CETP, Plot No. D-260-261, Phase-VIII, Focal Point, Ludhiana, Punjab.**
- I. During the visit on 23.04.2024, the CETP was found operational with the flow rate of 450 KLD. It is informed that the CETP receives effluent through dedicated tankers from member units through vehicles (56 in number) equipped with GPS system for carrying effluent. The CETP comprised of physico-chemical process followed by filtration, two stage Reverse Osmosis (RO) followed by evaporator to achieve ZLD as per the consent and EC condition.
- II. The Air consent is valid upto 30.06.2028 and the Water consent is valid upto 30.06.2027 for the operation of 500 KLD CETP. However, the Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 was valid till 16.06.2021. It was informed that the CETP has applied for renewal of authorization to PPCB on 01.10.2021.
- III. It was reported that 1613 Electroplating industries / Metal Surface Treatment units have obtained membership from CETP and connected to the CETP at the time of

visit. It was also informed by the CETP operator that inlet norms for CETP is not prescribed in the consent.

- IV. On the day of visit, it was observed that the flow meters are installed at RO Feed, RO Reject, Evaporators Vessels feed and Evaporator concentrate. It was reported that the CETP have not installed differential pressure gauge system at Cation-Anion and Carbon filter systems which can be used to indicate the choking/scaling of filtration system.
- V. During the visit, grab samples were collected from the RO outlet of CETP. The analysis result reveals that treated effluent is complying with the notified discharge standards. Discharge of effluent from the CETP premises was not observed during visit. It is reported that treated effluent (RO Permeate and Condensate) is used for cooling tower makeup water, plantation, gardening, watering to MC parks, DC office, NH-95, construction work. The CETP has also made agreement with M/s Vardhman Special Steels Limited C-58, Focal point Phase-3, Ludhiana, to take 100 KLD treated effluent through tankers for using in different purpose as per requirement. Furthermore, the CETP operator has maintained the records of the treated effluent taken by the users for gardening, construction activities & industrial use and others. The CETP has established an Environmental laboratory.
- VI. The CETP has installed OCEMS (Electromagnetic flow meter, PTZ camera) at the final outlet / RO permeate which is connected to CPCB/PPCB portal in compliance of CPCB directions.
- VII. The CETP has installed 05 KLD STP with Moving Bed Biofilm Reactor (MBBR) for treatment of domestic wastewater.

**AND, NOW, THEREFORE**, in exercise of powers conferred under section 18(1) (b) of the Water (Prevention & Control of Pollution) Act, 1974 and Air (Prevention and control of pollution) Act, 1981, Punjab Pollution Control Board (PPCB) is hereby directed to take appropriate action including imposing environmental compensation and to ensure that CETPs are operated ensuring.

- a. Operation/augmentation of the treatment system, appropriately, so as to meet the prescribed discharge standards and to comply with the disposal condition mentioned in the Environmental clearance by MoEF & CC dated 03.05.2013 and 08.12.2014 in the aforesaid 40 MLD, 50 MLD and 15 MLD CETPs. Further, to stop discharging of treated effluent into Buddha Nallah from the 50 MLD CETP, 40 MLD CETP and 15 MLD CETPs.

- b. With valid consent under the Water Act-1974 / Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 from PPCB and comply with all the conditions mentioned thereof.
- c. Undertaking regular calibration, maintenance and validation of the OCEMS analysers as per standard operating procedures/recommendations of the suppliers, so as to ensure generation of continuous & reliable data.

Further, PPCB is also hereby directed:

- a. To prescribe disposal condition to respective CETPs in accordance with the Environmental clearance by MoEF&CC dated 03.05.2013 and 08.12.2014.
- b. To prescribe the inlet standard for CETP in accordance to the CETP notification dated 01.01.2016.
- c. To regularly undertake verification of member industries of the CETP for ensuring proper operation of PETP/ETP by individual member industry.

The action taken by PPCB be intimated to CPCB within 15 days of receipt of these directions.

(Bharat Kumar Sharma)  
Member Secretary

**Copy to:**

1. **The Chairman** : for information, please.  
Punjab Pollution Control Board  
Vatavaran Bhawan, Nabha Road  
Patiala Punjab
2. **The Additional Secretary (CP Division)** : for information, please.  
Ministry of Environment, Forests & Climate  
Change,  
Prithvi Wing, 2<sup>nd</sup> Floor, Indira Paryavaran  
Bhawan, Jor Bagh Road,  
New Delhi-110 003.

3. **The Regional Director (Chandigarh)** : for follow-up, please.  
Central Pollution Control Board  
BSNL Telephone Exchange, 2<sup>nd</sup> Floor  
Sector – 49C, Chandigarh - 160047
4. **Divisional Head, WQM-I,** : for information, please.  
CPCB, Delhi
5. **Divisional Head, IPC-VI,** : for information, please.  
CPCB, Delhi
6. **Divisional Head, IT** : for uploading on CPCB  
CPCB, Delhi website, please.

(Bharat Kumar Sharma)

o/c

**Analytical Results of monitoring of Budah Nallah and River Sutlej**

S. No.	Location	Physio-chemical Parameters				
		pH	COD (in mg/L)	BOD (in mg/L)	TSS (in mg/L)	NH3-N (in mg/L)
General Effluent Discharge Standards as per Schedule-VI of Environment (Protection) Rules, 1986		5.5-9.0	< 250	< 30	< 100	< 50
1.	Budha Nallah at Walipur	7.1	448	219	408	11

S. No.	Location	Physio-chemical Parameters			Bacteriological Parameters	
		pH	DO (in mg/L)	BOD (in mg/L)	Fecal Coliform (in MPN/100 ml)	Fecal Streptococci (in MPN/100 ml)
Primary Water Quality Criteria for Outdoor Bathing Water as per Schedule-I of Environment (Protection) Rules, 1986		6.5 - 8.5	> 05	<03	<2500	< 500
1.	River Sutlej before confluence of Budha Nallah	8.1	09	BDL	13*10 <sup>2</sup>	460
2.	River Sutlej after confluence of Budha Nallah	7.6	06	08	17*10 <sup>4</sup>	22*10 <sup>3</sup>

Detection Limit for BOD: 1 mg/L