

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

**Original Application No. 642/2019**

**Rameshwar Patidar, Naya**

**Versus**

**State of Madhya Pradesh**

**REPLY ON BEHALF OF M.P. Pollution Control Board  
(MPPCB)**

The Madhya Pradesh Pollution Control Board respectfully submits its reply in pursuance to the following directions given by the Hon'ble tribunal vide its order dated 20.08.2019 :-

Hon'ble NGT Order dated 20.08.2019

*"Grievance in this letter, which has been treated as an application, is against pollution caused by liquor factory by discharging toxic chemicals at village Khodi Badwah, District Khargone, Madhya Pradesh.*

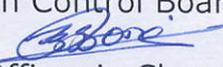
*Let the Madhya Pradesh Pollution Control Board (MPPCB) look into the matter and take appropriate action in accordance with law and furnish a factual and action taken report to this Tribunal within one month from the date of receipt of copy of this order by e-mail at [judicial-ngt@gov.in](mailto:judicial-ngt@gov.in) ."*



1. That, in compliance of the above directions given by the Hon'ble Tribunal, Member Secretary, M. P. Pollution Control Board, Bhopal vide its order no. 1090 dated 24.08.2019 directed Regional Officer Indore to submit action taken report. Regional Officer MPPCB at Indore, vide its order no. 2508 dated 22.08.2019, constituted an inspection team comprising of officers namely (1) Dr. D.K. Wagela, Lab Incharge, Regional Lab, M.P. Pollution Control Board, Indore, (2) Mr. K.P. Soni, Executive Engineer, Regional Office, M.P. Pollution Control Board, Indore and (3) Mr. Atul Kotiya, Scientist, Regional Lab, M.P. Pollution Control Board, Indore, M.P. to inspect the site and submit the report as directed by this Hon'ble Tribunal **(Annexure R-1)**. This team visited the site on 10.09.2019. The joint inspection report, covering the reply of all the directions given by this Hon'ble Tribunal, is enclosed as **Annexure R-2**:
2. That, Hon'ble Tribunal may kindly be pleased to take the aforesaid reply on record.

Date: 16.09.2019

Place: Indore

Submitted by:-  
M.P. Pollution Control Board  
  
Through Officer in Charge  
[K.P. Soni]  
Executive Engineer, MPPCB, Indore

Regional Office  
M.P. Pollution Control Board  
Vijay Nagar, INDORE-462010

क्षेत्रीय कार्यालय,  
म० प्र० प्रदूषण नियंत्रण बोर्ड,

योजना क्र० 78-सी प्लॉट नं०-1, पार्ट-2 अरण्य विजयनगर इन्दौर. 452010

☎ 2555436 फैक्स : 4035618 e-mail:-romppcb\_indore@rediffmail.com

क्र०. 2508 / त०शाखा / 19

इन्दौर, दिनांक 22/08/19

// कार्यालय आदेश //

माननीय हरित अधिकरण नई दिल्ली के समक्ष प्रचलित प्रकरण क्रं. 642/2019 (रामेश्वर पाटीदार नाया विरूद्ध म.प्र. शासन) में माननीय अधिकरण द्वारा दिनांक 20.08.2019 को जारी आदेश की छायाप्रति संलग्नक-1 के अनुसार है। माननीय हरित अधिकरण द्वारा दिये गये निर्देशों के पालनार्थ निम्नानुसार अधिकारियों को दल निरीक्षण हेतु एवं आवश्यक जवाब/कार्यवाही बाबद् गठित किया जाता है :-

क्रं. अधिकारी का नाम व पदनाम

- 1 डॉ. डी.के. वागेला, प्रयोगशाला प्रभारी- संयोजक
- 2 श्री के.पी. सोनी, कार्यपालन यंत्री
- 3 श्री अतुल कोटिया, वैज्ञानिक

उपरोक्तानुसार दल द्वारा स्थल का निरीक्षण 07 दिवस के भीतर किया जावे एवं शिकायतकर्ता द्वारा की गई शिकायत के आधार पर स्पष्ट प्रतिवेदन एवं प्रकरण में उपयुक्त कार्यवाही का प्रस्ताव प्रस्तुत किया जावेगा। प्रकरण माननीय हरित अधिकरण से संबंधित है, अतः महत्वपूर्ण मानते हुए समय सीमा में कार्यवाही की जावे।

संलग्न :- उपरोक्तानुसार।

(आर.के. गुप्ता)

क्षेत्रीय अधिकारी, इन्दौर

पृ०क्र० 2508 / त०शाखा / 19

इन्दौर, दिनांक

22/08/19

प्रतिलिपि :-

1. सदस्य सचिव, म.प्र. प्रदूषण नियंत्रण बोर्ड, भोपाल की ओर सूचनार्थ प्रेषित।
2. श्री सुधीर श्रीवास्तव, विधि अधिकारी, म.प्र. प्रदूषण नियंत्रण बोर्ड, भोपाल की ओर सूचनार्थ अग्रेषित कर निवेदन है कि उक्त प्रकरण में बोर्ड की ओर से श्री के.पी. सोनी, कार्यपालन यंत्री को एन.जी.टी. हेतु प्रभारी अधिकारी नियुक्त किया जाना प्रस्तावित है।
3. डॉ. डी.के. वागेला, प्रयोगशाला प्रभारी, क्षेत्रीय प्रयोगशाला, म.प्र. प्रदूषण नियंत्रण बोर्ड, इन्दौर की ओर सूचनार्थ एवं पालनार्थ।
4. श्री के.पी. सोनी, कार्यपालन यंत्री, क्षेत्रीय कार्यालय, म.प्र. प्रदूषण नियंत्रण बोर्ड, इन्दौर की ओर सूचनार्थ एवं पालनार्थ।
5. श्री अतुल कोटिया, वैज्ञानिक, क्षेत्रीय प्रयोगशाला, म.प्र. प्रदूषण नियंत्रण बोर्ड, इन्दौर की ओर सूचनार्थ एवं पालनार्थ।



(आर.के. गुप्ता)  
क्षेत्रीय अधिकारी, इन्दौर



Regional Laboratory

**M P Pollution Control Board**

Sch. No. 78/C, Part II, Aranya, Vijay Nagar, Indore-452010 (MP)

Phone: 0731 2554337; e-mail: regional.labindore@yahoo.com

**Joint Inspection Report****Of****M/s Associated Alcohols & Breweries Ltd., Gram-Khodi,  
Barwaha, District-Khargone**

<b>A : General Information</b>			
<b>1</b>	<b>Name of Unit and location</b>	<b>M/S Associated Alcohols &amp; Breweries Ltd., Gram-Khodi, Barwaha, Distt.-Khargone</b>	
<b>2</b>	<b>Date of Inspection</b>	10/09/2019	
<b>3</b>	<b>Name of the proprietor/ contact person Designation Contact No.</b>	Shri H.K. Bhandari Director, 9826079794	
<b>4</b>	<b>Product name and quantity (As per consent)</b>	<b>Product Name</b>	<b>Production Capacity</b>
		I.M.F.L. Bottling Grain Based Distillery (Rectified Spirit)	50.00 Lakh Liter/Annum 140 KLD
<b>5</b>	<b>Raw Materials</b>	Broken Rice	11200 MT/Year
		Sorghum	120000MT/Year
		Maize	121000 MT/Year
		Millet	129230 MT/Year
		Alfa Amylase	20000 Kgs/Year
		Amyloglucosides	40000 Kgs/Year
<b>6</b>	<b>Water Consumption</b>	Industrial – 1049 KLD (Approx) Domestic – 10 KLD (Approx)	
<b>7</b>	<b>Waste water generation</b>	Industrial – 362 KLD (Approx) Domestic – 8.8 KLD (Approx)	
<b>B: Pollution Control Measures</b>			
<b>8</b>	<b>Detail of Effluent Treatment Plant (ETP) for Effluent treatment</b>	<ul style="list-style-type: none"> <li>ETP based on zero liquid discharge (ZLD) has been installed. The ETP consist of multi effect evaporator (MEE) &amp; ATFT with capacity 650 KLD provided.</li> </ul>	

		<ul style="list-style-type: none"> <li>Secondary Treatment Plant consisting of bar screen, holding tank, aeration tank-I, clarifier, aeration tankII, final clarifier with capacity 1200 KLD installed</li> <li>Tertiary treatment plant for 1200 KLD capacity provided having RO feed tank, RO system (02 units X 600 KLD) and reject sent to MEE.</li> </ul>
9	<b>Detail of STP for Domestic Effluent treatment</b>	Collection tank. The waste water is fed to Aeration Tank for treatment.
10	<b>Observation</b>	<ul style="list-style-type: none"> <li>At the time of inspection all the systems related to ETP were found running properly. The zero liquid discharge was maintained and RO water is used for Boiler &amp; other process.</li> <li>No discharge observed out of premise during survey &amp; inspection.</li> </ul>
11	<b>Mode of disposal of treated effluent</b>	ZLD based system installed hence not applicable.
12	<b>Source of Air pollution and arrangement for control air pollution.</b>	20 TPH Boiler-Bag Filter & MDC 8 TPH Boiler -Bag Filter & MDC 12 TPH Boiler- MDC (Closed)
13	<b>Fuel</b>	Coal-103 MT/Day
14	<b>Stack Height</b>	Height of stack 30mt & 35 mt.
15	<b>Observations</b>	The air pollution control equipments are found in operation and no problem of air pollution observed during inspection.
16	<b>Solid waste management</b>	Distiller's Wet Grain Soluble (DWGS) – 230 TPD/Day ( sale to Cattle Feed Suppliers)
17	<b>Area for plantation</b>	Approx. 10.00 Acres ( 4000 plants)
18	<b>Continuous Monitoring System</b>	<ul style="list-style-type: none"> <li>CEMS for Particulate Matter in both the stacks provided.</li> <li>PTZ , 360° Movable, Auto Zoom Camera installed to observe zero discharge.</li> <li>Connectivity given to CPCB &amp; MPPCB.</li> </ul>

**OBSERVATIONS & FINDINGS:**

Regional Officer, M.P. Pollution Control Board, Indore constituted a team of the undersigned officers vide letter no. 2508 dt. 22/08/2019 to inspect the industry, pollution control measures, nearby villages to take ground water samples and

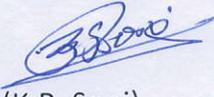
*(Handwritten signatures)*

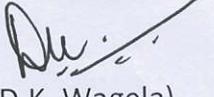
submit the report as directed by hon'ble National Green Tribunal. The team visited industry on 10.09.2019. The details of the findings are as under:-

1. M/s Associated Alcohols & Breweries Ltd. is located at Gram- Khodi, Tehsil- Barwaha, District- Khargone. The industry is manufacturing rectified spirit since 1986. It is grain based distillery. It is pertinent to mention here that in the beginning, the distillery was molasses based. It was converted to 100% grain based distillery in the year 2011. The Board granted consent to industry under Water & Air Acts with main conditions to maintain zero liquid discharge and reuse the treated waste water in the premise itself. The consent granted under Air/ Water Act is valid up to 31.07.2020.
2. Industry has installed MEE, Dryer, and Secondary ETP along with reverse osmosis plant (RO) as tertiary treatment plant for treatment of waste water and to maintain zero liquid discharge. The details of above waste water treatment system are given here in above. During inspection, the team observed that all the treatment plants provided for treatment of waste water are working properly. The permeate of RO is used for boiler & cooling purposes. There is no industrial discharge found outside of factory premises.
3. Team visited nearby villages i.e. Naya gram, Khodi gram, located near above distillery. Gram- Khodi is adjacent to distillery however gram Naya is about 1.5 Km. away from the factory in South- West direction.
4. Team called Mr. Rameshwar Patidar, resident of gram Naya (Applicant in this Case) & requested him to be present with the team during inspection. He picked the phone & promised to join inspection but later informed that he is not coming owing to his busyness. Hence the team conducted inspection in presence of various local residents and made Panchnama. The same is enclosed as **Annexure-1**.

5. In the present application Mr. Rameshwar Patidar, Naya submitted that the liquor factory is discharging toxic chemicals and also ground water of the area is polluted due to distillery. Team visited nearby village Naya, which is about 1.5 km. away from the factory. The village Naya is located in South West direction of the industry. It appears that there is no chance of contamination of ground water from the effluent of this industry as industry has installed full fledged ETP based on zero liquid discharge and using the treated waste water in the premises in cooling tower and boilers.
6. During Survey, the team collected 08 samples of ground water surrounding distillery, from different directions at about 0.5 to 2.0 Km. from industry particularly near village Naya & Khodi. The samples were taken by the team and have been analyzed by Regional Laboratory, MPPCB , Indore & submitted the analysis report.
7. The monitoring reports of above samples are collectively enclosed as **Annexure-2**. From the perusal of the analysis report it is observed that the ground water samples are meeting the permissible limits for drinking water as notified in I S 10500:2012. It is pertinent to mention here that all the dug wells are used for agriculture purposes. There is piped water supply in both the villages i.e. Khodi and Naya village for drinking purposes. As Board has directed the industry to treat the waste water properly and observe zero liquid discharge hence in present scenario, the ground water pollution problem is not observed.
8. The photographs taken during inspection are enclosed as **Annexure -3**.
9. The location of sampling points is shown in Google map as **Annexure-4**.

  
(Atul Kotia)  
Scientist  
Regional Lab, MPPCB,  
Indore

  
(K.P. Soni)  
Executive Engineer  
Regional Office, MPPCB,  
Indore

  
(Dr. D.K. Wagela)  
Chief Chemist & Lab-Head  
Regional Lab, MPPCB,  
Indore

पंचनामा

माननीय हरित अभिकरण के बेल 642/2019 के तारलक्ष्य में आज दिनांक 10-9-19 को हम अधोल्लेखित व्यक्तियों के समक्ष

मै० एडोविट अल्फोल्स ए०५ ट्रेवरी लि: ग्राम खोड़ी, बड़लाह, खटगोन के लक्ष्मी के निम्नलिखित भूमिगत जल नमूनें क्वांटिफाई करवाए जाकर, निष्कर्ष हेतु क्षेत्रीय प्रयोगशाला, म.प्र. प्रदूषण नियंत्रण बोर्ड, इन्दौर भेजे गए। यह पंचनामा आवश्यकता पड़ने पर उपयोग हेतु लिया गया।

- (1) Open dug well in the premises of Pet Bottel plant
- (2) open dug well of Dilip Mandloi near Naya school
- (3) open dug well of Shri Ramchandra, Agraya
- (4) open dug well of Shri Rameshwar Gokul, Agraya
- (5) Open dug well near rail-way crossing.
- (6) Tube well near lagoon, Umaria Side.
- (7) Open dug well of Shri Mangilal Damaji, Agraya, Barwah.

क्र.	नाम	मोबाईल नं.	हस्ताक्षर
1.	अनुरा कोटिया, वैसाविक म.प्र. प्रदूषण नियंत्रण बोर्ड, इन्दौर	98935-55466	 10-9-19
2	रणकर सिंह	9893473460	
3.	गानकलाम	मा. 9479539203	गानकलाम
4	राजेश मगर	मा. 9826829760	राजेश मगर
5	भगवान दिखे	मा 9039750875	भगवान दिखे
6	आशीष शंकरासन/वपुषी	मा. 8120499847 9340628280	आशीष शंकरासन

Dr. 10/9/19  
Dr. D. K. WAGELA  
Lab. Head  
MPPCB, Indore

10/9/2019  
K. J. SONI  
E.E. MPPCB, Indore

## Ground Water Quality around M/s Accosiated Alcohols &amp; Breweries Ltd., Vill. Khodi, Distt., Khargone

S.No	Characteristic	Unit	Open dug well in take premises of Pet Bottle Plant	Open dug well of Dilip Mandloi near Naya School	Open dug well of Shri Ram Chandra, Naya	Open dug well of Shri Rameshwar Gokul, Naya	Open dug well near Railway crossing	Tubewell near Lagoon Umaria Side	Open dug well of Shri Mangilal Damaji Naya, Barwaha	Open dug well of Village Naya	Acceptable Limit for drinking water (IS:10500:2012)	Permissible Limit for drinking water (IS:10500:2012)
1	Date of Sampling		11.09.2019	11.09.2019	11.09.2019	11.09.2019	11.09.2019	11.09.2019	11.09.2019	11.09.2019		
2	Appearance		Clear	Clear	Clear	Clear	Clear	Clear	Clear	Clear		
3	Odour	T. No	Odour less	Odour less	Odour less	Odour less	Odour less	Odour less	Odour less	Odourless	Agreeble	Agreeble
4	pH	pH Unit	7.20	7.44	7.07	7.61	7.5	7.08	7.91	7.87	6.5	8.5
5	Turbidity	mg/L	2	4.1	2.2	4.8	2.6	1.1	4	1.8	1	5
6	Sp. Conductivity	µMhos/cm	1929	1454	2167	2184	1307	1006	2828	1861.6	Not Prescribed	Not Prescribed
7	T. Solids	mg/L	1307	1017	1613	1639	952	708	1685	1206	Not Prescribed	Not Prescribed
8	TDS	mg/L	1304	1012	1606	1630	946	704	1674	1202	500	2000
9	S. Solids	mg/L	3	5	7	9	6	4	11	4	Not Prescribed	Not Prescribed
10	Nitrate Nitrogen	mg/L	7.302	6.305	10.461	10.99	10.99	2.68	11.942	10.328	45	45
11	Chloride	mg/L	329.77	171.63	316	395.33	127.27	206.34	393.4	273.84	250	1000
12	Sulphate (SO <sub>4</sub> )	mg/L	85.8	62.4	109.41	117.08	97.48	56.613	136.28	94.214	200	400
13	T. Alkalinity	mg/L	336	288	344	150	392	428	224	344	200	600
14	T. Hardness	mg/L	548	444	568	572	488	400	480	352	200	600
15	Calcium as Ca	mg/L	161.92	133.06	161.92	160.32	112.22	80.16	176.35	97.79	75	200
16	Magnesium as Mg	mg/L	34.99	27.21	39.85	41.79	50.54	48.6	35.96	26.24	30	100
17	B.O.D.	mg/L	1.5	0.8	1.6	1.8	1.2	1.3	1.8	1.8	Not Prescribed	Not Prescribed
18	C.O.D.	mg/L	14.7	12.74	16.66	25.48	8.82	14.7	28.42	17.64	Not Prescribed	Not Prescribed
19	Sodium	mg/L	42.6	46	72.4	78.9	70.4	68.7	82.4	40.8	Not Prescribed	Not Prescribed
20	Potassium	mg/L	0.6	1.2	1.6	1.8	1.7	1.3	2.4	1.1	Not Prescribed	Not Prescribed
21	Fluoride	mg/L	0.36	0.38	0.63	0.69	0.6	0.42	0.78	0.41	1	1.5

Note - The Water of all Dugwell/Tubewell is being used for Agriculture purpose.

Atul Kotiya  
Scientist

(Atul Kotiya)

Regional Laboratory

Dr. D.K. Wagela

Chief Chemist & Lab. Head

Regional Laboratory

M.P. Pollution Control Board, INDOR

16/9/19

**M/s Associated Alcohols and Breweries Ltd.,  
Vill. Khodi, Distt.- Khargone**



**Photograph during Sample collection**

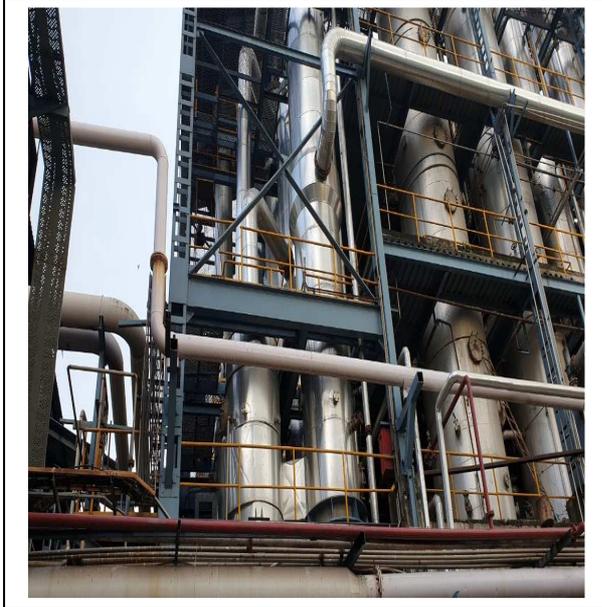


**Photograph of crops near industry**

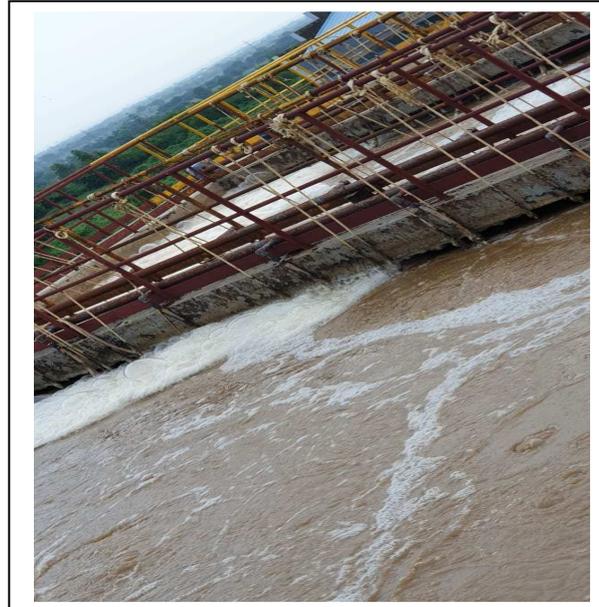


**Sample collection during inspection**

**M/s Associated Alcohols & Breweries Ltd., Gram-Khodi, Barwaha, District-Khargone**  
**Photographs of various components of ETP**



**Multieffect Evaporator**



**Aeration Tank**



**Clarifier**



**RO Plant**



**Sampling around industry (M/s Associated Alcohols & Breweries Ltd., Vill. Khodi, Distt., Khargone)**