

1001



BAHADUR KE TEXTILE & KNITWEAR ASSOCIATION (SPV)

(Company Regd. Under Companies Act, 1956)

(CIN- U93090PB2005NPL027846)

Ref. No. BKTK/CE7P/11/06

Dated : 18/11/2027

To

Registrar General

National Green Tribunal

Principle Bench , New Delhi

Sir

Kindly place the enclosed response of R- 8 to report of Chief Secretary, Punjab and report of AC in the matter of OA 225/ 2022, Nitin Dhiman Vs State of Punjab & Others, before Hon'ble Tribunal for kind consideration.

Thanking you

For Bahadur ke Textile & Knitwear Association

Director/Chairman

Yours

Respondent no 8

Bahadurke Road Textile Knitwear Association, Ludhiana

BEFORE THE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH :: NEW DELHI

ORIGINAL APPLICATION No. 225 of 2022

IN THE MATTER OF:

NITIN DHIMAN

....APPLICANT

VERSUS

STATE OF PUNJAB . & ORS.

...RESPONDENTS

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Filed by

Shri Balaji

Respondent NO 8

Bahadurke Road Textile Knitwear Association,

Ludhiana

Mail - shribalaji.finishingmills@gmail.com

Ph no 9357503191

BEFORE THE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH :: NEW DELHI

ORIGINAL APPLICATION No. 225 of 2022

IN THE MATTER OF:

NITIN DHIMAN

....APPLICANT

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STATE OF PUNJAB . & ORS.

....RESPONDENTS

**RESPONSE OF RESPONDENT NO 8, BAHADURKE ROAD
TEXTILE KNITWEAR ASSOCIATION, LUDHIANA TO THE
REPORT FILED BY RESPONDENT NO 1 AND AMICUS CURAE
SH GAURAV AGARWAL, ADVOCATE IN AUGUST 2023**

MOST RESPECTFULLY SHOWETH:

1. That a matter of Original Application No 225/22, titled Nitin Dhiman Vs State of Punjab & Others, pertaining to pollution of Buddha Nala, Ludhiana due to dyeing industries etc at Ludhiana is under consideration of this Hon'ble Tribunal.

2. That Bahadurke Road Textile Knitwear Association, Ludhiana was impleaded as Respondent No 8 vide order of Hon'ble Tribunal dated 24.1.2023 upon hearing IA no 21/2023 in the OA No 225/2022.
3. That a status report/ response to the OA has been filed by the Respondent on 19.5.2023 and the same is placed at running page no 296 – 337.
4. That upon hearing the matter on 26.5.2023, this Hon'ble Tribunal was pleased to direct Respondent NO 1 to 4 to file affidavit giving the present status of the project for use of treated waste water discharged from CETPs and STPs at Ludhiana in to Buddha Nala for irrigation of agricultural land. The Respondent No 1, Chief Secretary, Govt of Punjab had requested through his affidavit dated 4.8.2023 for two months time to submit said affidavit giving present status of the project for use of treated waste water discharged from CETPs and STPs at Ludhiana in to Buddha Nala for irrigation of agricultural land. Affidavit of Chief Secretary is placed at running page no 789-791. However, the Respondent No 1 to 4 have not filed said status report till now.

5. That this Hon'ble Tribunal was pleased to appoint Sh Gaurav Agarwal, Advocate, Supreme Court as Amicus Curae in the matter to assist Hon'ble Tribunal in the matter of present OA.
6. That Sh Gaurav Agarwal, AC along with applicant Sh Nitin Dhiman and officials of Punjab Pollution Control Board inspected the 15 mld CETP being managed by Respondent No 8 on 21.7.2023. Thereafter, the Ld AC has filed his report dated 2.8.2023 before Hon'ble Tribunal and the same is placed at running page No 685-785.
7. That Ld AC has made certain observations in respect of 15 mld CETP in his report dated 2.8.2023. The said observations and response of the Respondent to said observations is presented in following table.

S No./ para of Ld AC report	Observation of Ld AC in respect of 15 mld CETP (Running page 690-696)	Response/ Remark of the Respondent No 8
1/6(i)	On line result system was not working since 28.6.2023 although in house lab results are available till 20.7.2023.	Intimation for on line monitoring system not working was duly informed to PPCB vide letter dated 30.6.2023 (Copy enclosed as

		<p>Annexure R8/1 colly). The system was made functional by the vendor on 29.7.2023 and duly intimated to PPCB (copy of letter to PPCB enclosed at Annexure R 8/1 colly. It is properly functioning presently.</p>
2/6(v)	<p>Testing of inlet parameters is being done only once every month by PPCB. Grab random sample is collected. Test report dated 20.6.2023 is placed at running page 752.</p>	<p>The test results are not possible and suffer from gross errors. Therefore Secretary, S&T and Env , Govt of Punjab was requested for resampling. The subsequent results were found complying with parameters prescribed by CPCB. Test results for July – Oct and by third party are enclosed as Annexure R8/2 colly that reflect effluent are meeting prescribed standards. Copy of representation sent to</p>

		Secretary , Govt of Punjab dated 22.6.2023 is enclosed as Annexure R8/3 .
3/6(xi)	Connection for discharge of effluent any member units in to CETP is not based on their production capacity	Each member unit has installed flow meter at outlet of the unit whose data is on line available to SPV and PPCB.
4/6(xii)	CETP SPV does not have any mechanism to check ground water extraction by member units	Ground Water extraction in Punjab is governed by Punjab Water Resources Management & Regulation Act 2020 and guidelines made there under.
5/6(xiii)	There is huge variation in sludge generated by three CETPs. 60, 15 and 250 t/month for 15, 50 and 40 mld CETP respectively.	The quantity of average sludge produced per month is about 60 ton. The quantity is less than average at 40 mld CETP since sludge dryer has been additionally installed to reduce moisture in the sludge.
6/7(i)	Buddha nala has encroachments on both side and it is full of cowdung,	PPCB and Municipal Corporation has not taken any corrective measures on these

	plastic waste etc. about 300 dairies are located adjoining the drain.	issues. A copy of news report is enclosed as Annexure R 8/4
7/7(ii)	As informed by PPCB that for 42 of 54 scattered dyeing units, orders are issued to disconnect sewer line. Only 1 of remaining 12 units have attained zld. 1 of these is issued order for disconnection of sewer line and remaining 10 are allowed time up to 31.3.2024 to segregate discharge from municipal sewer line. These all units discharge about 16.54 mld waste water in to buddha nala.	Ld AC has mentioned status for July 2023. Even on 29 Oct 2023, as per news report (Annexure R 8/5), Municipal Corporation is still serving notices to 33 units to disconnect their sewer connection of their own. It seems a time pass ploy. A copy of notice issued to individual scattered unit in June 2023 is also enclosed as Annexure R 8/6 . no effective action is taken to our knowledge.
8/ 7(iv)	Bahadurke Road Textile Knitwear Association is granted EC for ZLD. However CETP is not ZLD.	After initial EC based on ZLD, the DPR was prepared and project was sanctioned by MoEFCC for grant in aid (subsidy) as per the central scheme. However , since the

		<p>cost was very high, the banks did not favour granting loan. Accordingly, the MoEFCC was appraised factual position and MoEFCC sanctioned the project by removing tertiary treatment from said DPR. After sanction the DPR was again amended to provide same treatment scheme as sanctioned for 40 and 50 mld CETP as per decision taken in meeting of State Govt. Both these CETPs are sanctioned by MoEFCC on non zld basis. Detailed letter sent to Secretary Govt of Punjab on this issue is still pending. A copy of said letter is enclosed as Annexure R8/ 7.</p>
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Respondent No 8

Bahadurke Road Textile Knitwear Association,

Ludhiana

New Delhi

Dated 17.11.2023

BEFORE THE NATIONAL GREEN TRIBUNAL**PRINCIPAL BENCH :: NEW DELHI****ORIGINAL APPLICATION No. 225 of 2022****IN THE MATTER OF:**

NITIN DHIMAN

....APPLICANT

VERSUS

STATE OF PUNJAB . & ORS.

....RESPONDENTS

A F F I D A V I T

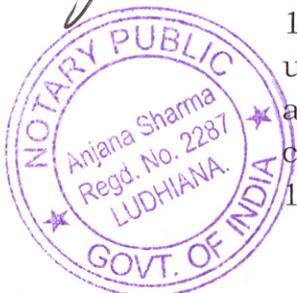
I, Lalit Jain, Chairman of Bahadurke Road Textile Knitwear Association at present at Ludhiana, do hereby solemnly affirm and declare as under: -

1. That I am presently Chairman of Bahadurke Road Textile Knitwear Association a Company registered under company Act having Registered office at Swami Vivekanand Marg, Near Kali Mata Mandir, Bazigar Dera, Bahadur ke Road, Ludhiana and duly authorized by the Company to file accompanying application.

2. That I am fully conversant with case as derived from office record and competent to swear to this affidavit.

11. That I have read the accompanying response and have understood the contents thereof. The facts stated there in are true and correct to the best of my knowledge and nothing has been concealed there from.

12. That the Annexures are true copy of the originals.



Lalit Jain

Lalit f
DEPONENT

VERIFICATION:

Verified at Ludhiana on this day of Nov 2023, I the above named deponent, do hereby verify that the contents of the above affidavit are true and correct. No part of it is false and nothing material has been concealed there from.

verified that the affidavit has been read over & explained to the deponent who seemed to perfectly understand at some of the time making here of

Lalit f
DEPONENT

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ATTESTED AS IDENTIFIED

Anjana Sharma
Notary Public, Ludhiana (Pb.)

18 NOV 2023

**BAHADUR KE TEXTILE & KNITWEAR ASSOCIATION (SPV)****(Company Regd. Under Companies Act, 1956)**

(CIN- U93090PB2005NPL027846)

Ref. No. BKTK/CE 70/06/16

Dated : 30/6/2020

To

Senior Environmental Engineer

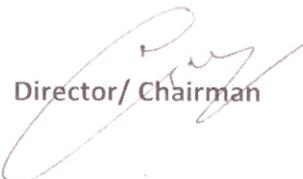
Punjab Pollution Control Board, Ludhiana

Subject:- Regarding Fluctuation/fault in sensors at inlet and outlet of OCMS at the 15 MLD CETP dyeing complex Bahadurke Road , Ludhiana

Respected Sir ,

This is for your kind information that the inlet and outlet sensors of OCMS installed at 15 MLD CETP is faulty and showing fluctuation in readings, the concerned vendor has been intimated regarding the same. Shall be rectified and made operational in a few days

For Bahadur Ke Textile & Knitwear Association SPV


Director/ Chairman

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BAHADUR KE TEXTILE & KNITWEAR ASSOCIATION (SPV)

(Company Regd. Under Companies Act, 1956)

(CIN- U93090PB2005NPL027846)

Ref. No. BK 710 / CE 77/07 / 114

Dated 29/7/2023

To

Senior Environmental Engineer

Punjab Pollution Control Board, Ludhiana

Subject:- Regarding fault in sensors at inlet and outlet of OCMS at the 15 MLD CETP dyeing complex Bahadurke Road , Ludhiana

Respected Sir ,

This is for your kind information that the inlet and outlet sensors of OCMS installed at 15 MLD CETP is rectified and made operational.

For Bahadur Ke Textile & Knitwear Association SPV


Director/ Chairman

Enclosed :-

1. Rectification Report by the concerned vendor

15

Office : Swami Vivekanand Marg, Near Kali Mata Mandir, Bazigar Dera, Bahadur Ke Road,
Industrial Zone, Ludhiana-141008. (Pb.)

Contact : 98140-30105, 93575-03191, 93571-33001

E-mail : shribalaji.finishingmills@gmail.com btk15mldcetp@gmail.com adinathdyeing@yahoo.co.in

Date-29/07/

Mom Between M/s 15 MLD CETP & Nevco Engineers Pvt Ltd.

M/s 15 MLD CETP,
1. Mr. Gagandeep Singh

M/s Nevco Engineers Pvt Ltd.
1. Mr. Naresh Kumar

Sub.- Regarding WQMS System Service Visit.

M/S Nevco engineers visited our plant CETP site on 28/07/2023. The following job were carried out: -

- 1.M/s Nevco engineer checked the both inlet & outlet installed water quality monitoring system.
- 2.M/s Nevco engineer found some problem in the inlet sensor. & Outlet Sensor
- 4. M/S Nevco engineer will check the sensor and now it is in working.

M/s 15 MLD CETP.
Gagandeep Singh
29/7/2023

M/s Nevco Engineers Pvt Ltd.
[Signature]
29/7/2023



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R82

(17)

Sophisticated Analytical Instruments Laboratories*Society (Registered as Society with Registrar of Firms & Societies, Punjab, Chandigarh)*

Thapar Technology Campus, Bhadson Road, Patiala-147 004 (India)

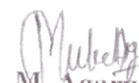
TEST REPORT

Sample ID	NN(D)/23-24/178	Date:	07.07.2023
Service No.	NN(D)/23-24/178 (01-02)	Customer's Ref.	Sample Collected by Mr. Amit Kumar on dtd. 28.06.2023 as per letter No. BKTK/CETP/06/08 dtd.21/06/2023
Customer's name and address:			
Bahardur Ke Textiles & Knitwear Association (SPV) Backside Oswal Dyeing, Bahadur Ke Road, Ludhiana. Kind Attn: Mr. Rajneesh Gupta .			
Sample Description	Waste Water		
Condition of the sample received	O.K.		
Customer's sample identification No. (if any)	01- CETP 15 MLD Outlet 02- Budha Nala Outlet of CETP		
Quantity/number of samples	5 Litre each / two		
Sampling Procedure (if any) , Method followed	IS:3025 (Part-I) 1987 , Reaffirmed 2003, SAI/SOP/03/47		
Mode of Sampling/ Environmental Condition During Transport	Grab Drawn/ Preserve in ice box		
Test parameters	pH, TSS, TDS, COD, BOD, O&G, Colour ,RFC, T.Cr, Sulphide, P. Compounds, SAR, RSC		
Standard/Specification	--		
Deviations (if any)	--		
Documents constituting this report (if any)	--		
Date of Receipt of Job	Date of Completion of Job	Total Number of Pages	
29.06.2023	07.07.2023	1	

TEST RESULTS

S. No.	Parameters	Test Method	Unit	Results	
				01	02
1	pH at 25°C	APHA 23rd Edn.4500-H+B:2017	--	7.8	8.1
2	Total Dissolved Solid at 180°C (TDS)	APHA 23rd. Edn 2540-C:2017	mg/l	1760	1796
3	Total Suspended Solid at 105°C (TSS)	APHA 23rd. Edn.2540-D:2017	mg/l	14	<10
4	Chemical Oxygen Demand (COD)	APHA 23rd Edn. 5220B:2017	mg/l	123	140
5	Biochemical Oxygen Demand for 3 days at 27°C (BOD)	IS: 3025 (Part 44)-1993, Reaffirmed 2019	mg/l	24	28
6	Oil & Grease at 80°C (O&G)	APHA 23rd. Edn. 5520 B :2017	mg/l	8.7	7.2
7	Colour	IS: 3025 (Part 4)-2021 2nd rev. Spectrophotometric Single Wavelength method	Pt. Co. Unit	476	416
8	Residual Free Chlorine	APHA 23 rd Edn. 4500 Cl B:2017	mg/l	Nil	Nil
9	Total Chromium as Cr	APHA 23rd. Edn.3120 B:2017	mg/l	<0.05	<0.05
10	Sulphide as S ²⁻	APHA 23rd. Edn. 4500 S-2 F:2017	mg/l	<1.0	<1.0
11	Phenolic compound as C ₆ H ₅ OH	APHA 23rd. Edn. 5530 D:2017	mg/l	0.22	<0.10
12	Sodium Absorption Ratio (SAR)	IS:11624,2019	--	15.86	17.81
13	Residual Sodium Carbonate (RSC)	IS:11624,2019	Meq/l	2.377	1.5239

.....End of the report.....


M. Agarwal
Technical Manager
 (Authorized Signatory)

- Note:
- The results listed refer only to the tested samples and applicable parameters. Endorsement of products is neither inferred nor implied
 - Samples will be destroyed after one month (except water, wastewater) from the date of issue of the test report unless otherwise specified
 - This report is not to be reproduced wholly or in part and cannot be used as an evidence in the products is neither inferred nor implied court of law and should not be used in any advertising media without special permission in writing.
 - In case any reconfirmation of contents of the test report is required, please contact the authorized signatory of the test report within 15 days of the issue of test report



Ph. 0161-2676350

Punjab Pollution Control Board

Zonal Laboratory, E-648-B, 2nd Floor,
Phase-5, Focal Point, Ludhiana.

E-mail: stlabppcblhb@gmail.com

Water Analysis Report

1. Laboratory Sample no.: E 12/Zonal Lab/2023
2. Name of Industry : M/s Bahadurke Textile & Knitwear Association,
CETP-15 MLD, Ludhiana
3. Name of Sample Collecting Officer : Er. Bhisham, Assistant Environment Engineer
4. Type of Sample : Grab
5. Date of Sample Collection : 25.07.2023
6. Date of Receiving: 26.07.2023
7. Method Followed IS 3025/ methods of APHA

Results:

Sr. No.	Parameters	Inlet	Treated Water Storage Tank	Line Leading to Budha Nallah
1.	pH	7.3	8.0	7.9
2.	Total Suspended Solids (mg/l)	186	38	36
3.	Total Dissolved Solids (mg/l)	3210	2020	2065
4.	Chemical Oxygen demand (mg/l)	812	132	152
5.	Bio-chemical Oxygen Demand (mg/l)	220	20	24
6.	Oil & Grease (mg/l)	11.4	BDL	BDL
7.	Sulphide (mg/l)	9.4	BDL	BDL
8.	Phenolic Compound (mg/l)	1.8	BDL	BDL
9.	Ammonical Nitrogen (mg/l)	7.6	5.4	5.2
10.	Total Chromium (mg/l)	BDL	BDL	BDL
11.	Sodium Absorption Ratio (SAR)	21.52	18.25	18.30
12.	Residual Sodium Carbonate (RSC) meq/l	2.03	0.26	0.30
13.	Colour (PCU- Pt-Co. Unit)	210	145	175
14.	Bio-assay	-	100% survival of fish in 100% effluent in 96 Hrs.	100% survival of fish in 100% effluent in 96 Hrs.

Remarks :-

1. BDL means Below Method Detection Limit.
2. Colour parameter was analyzed at Head office Lab, Patiala.
3. No specific standards are prescribed as per EPA, However if any stringent/other standards have been imposed by the board, the same shall prevail.

[Signature]
Junior Scientific Officer,
Zonal Lab, Ludhiana

Dated 08/08/2023

Ends. No. 407-409

A copy of the above is forwarded to the following for information and necessary action please along with data sheet:-

1. The Chief Environmental Engineer, Punjab Pollution Control Board, Ludhiana.
2. The Senior Environmental Engineer, Punjab Pollution Control Board, Zonal Office-2, Ludhiana.
3. The Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana.

[Signature]
Scientific Officer,
Zonal Lab Ludhiana

Scanned by CamScanner



Ph 0161-2676350

Punjab Pollution Control BoardZonal Laboratory, E-648-B, 2nd Floor,
Phase-5, Focal Point, Ludhiana.E-mail: stbpcblhdh@gmail.com19**Water Analysis Report**

1. Laboratory Sample no.: E 16/Zonal Lab/2023
2. Name of Industry : M/s Bahadurke Textile & Knitwear Association,
CETP-15 MLD, Ludhiana
3. Name of Sample Collecting Officer : Er. Bhisham, Assistant Environment Engineer
4. Type of Sample : Grab
5. Date of Sample Collection : 30.07.2023
6. Date of Receiving: 31.07.2023
7. Method Followed IS 3025/ methods of APHA

Results:

Sr. No.	Parameters	From final outlet leading to Budha Nallah
1.	pH	
2.	Total Suspended Solids (mg/l)	8.3
3.	Total Dissolved Solids (mg/l)	36
4.	Chemical Oxygen demand (mg/l)	2410
5.	Bio-chemical Oxygen Demand (mg/l)	180
6.	Oil & Grease (mg/l)	26
7.	Sulphide (mg/l)	4.2
8.	Phenolic Compound (mg/l)	BDL
9.	Ammonical Nitrogen (mg/l)	BDL
10.	Total Chromium (mg/l)	4.9
11.	Sodium Absorption Ratio (SAR)	BDL
12.	Residual Sodium Carbonate (RSC) meq/l	19.5
13.	Colour (PCU- Pt-Co. Unit)	0.76
14.	Bio-assay	190
		100% survival of fish in 100% effluent in 96 Hrs.

Remarks :-

1. BDL means Below Method Detection Limit.
2. No specific standards are prescribed as per EPA, However if any stringent/other standards have been imposed by the board, the same shall prevail.

[Signature]
Junior Scientific Officer,
Zonal Lab, Ludhiana

Dated 08/08/2023Ends. No. 404-406

A copy of the above is forwarded to the following for information and necessary action please along with data sheet:-

1. The Chief Environmental Engineer, Punjab Pollution Control Board, Ludhiana.
2. The Senior Environmental Engineer, Punjab Pollution Control Board, Zonal Office-2, Ludhiana.
3. The Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana.

[Signature]
Scientific Officer,
Zonal Lab, Ludhiana
8/8/23

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Ph. 0161-2676350

Punjab Pollution Control Board

Zonal Laboratory, E-648-B, 2nd Floor,
Phase-5, Focal Point, Ludhiana.

E-mail. ilabppcbldh@gmail.com

Water Analysis Report

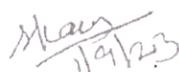
1. Laboratory Sample no.: E 33 /Zonal Lab/2023
2. Name of Industry : M/s Bahadurke Textile & Knitwear Association,
CETP-15 MLD, Ludhiana
3. Name of Sample Collecting Officer : Er. Bhisam, Assistant Environment Engineer
4. Type of Sample : Grab
5. Date of Sample Collection : 24.08.2023
6. Date of Receiving: 24.08.2023
7. Method Followed IS 3025/ methods of APHA

Results:

Sr. No.	Parameters	Inlet	Treated Water Storage Tank	Line Leading to Budha Nallah
1.	pH	7.3	8.2	8.3
2.	Total Suspended Solids (mg/l)	196	32	28
3.	Total Dissolved Solids (mg/l)	2841	2491	2514
4.	Chemical Oxygen demand (mg/l)	840	128	136
5.	Bio-chemical Oxygen Demand (mg/l)	235	18	19
6.	Oil & Grease (mg/l)	12.6	BDL	BDL
7.	Sulphide (mg/l)	7.0	1.4	1.6
8.	Phenolic Compound (mg/l)	2.1	BDL	BDL
9.	Ammonical Nitrogen (mg/l)	7.2	6.0	6.2
10.	Total Chromium (mg/l)	BDL	BDL	BDL
11.	Sodium Absorption Ratio (SAR)	16.15	10.74	10.12
12.	Residual Sodium Carbonate (RSC) meq/l	2.07	0.67	0.83
13.	Colour (PCU- Pt-Co. Unit)	230	130	140
14.	Bio-assay	-	80% survival of fish in 100% effluent in 96 Hrs.	70% survival of fish in 100% effluent in 96 Hrs.

Remarks :-

1. BDL means Below Method Detection Limit.
2. No specific standards are prescribed as per EPA, However if any stringent/other standards have been imposed by the board, the same shall prevail.


 11/9/23
 Junior Scientific Officer,
 Zonal Lab, Ludhiana

Ends. No. 619-21

Dated 04-09-2023

A copy of the above is forwarded to the following for information and necessary action please along with data sheet:-

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Ph. 0161-2676350

Punjab Pollution Control Board

Zonal Laboratory, E-648-B, 2nd Floor,
Phase-5, Focal Point, Ludhiana.

E-mail: ilabppcbldh@gmail.com

Water Analysis Report

1. Laboratory Sample no.: E 55/Zonal Lab/2023
2. Name of Industry : M/s Bahadurke Textile & Knitwear Association,
CETP-15 MLD, Ludhiana
3. Name of Sample Collecting Officer : Er. Bhisham, Assistant Environment Engineer
4. Type of Sample : Grab
5. Date of Sample Collection : 15.09.2023
6. Date of Receiving: 16.09.2023
7. Method Followed IS 3025/ methods of APHA

Results:

Sr. No.	Parameters	Inlet	Treated Water Storage Tank	Line Leading to Budha Nallah
1.	pH	7.6	8.4	8.4
2.	Total Suspended Solids (mg/l)	114	23	20
3.	Total Dissolved Solids (mg/l)	5328	3302	3087
4.	Chemical Oxygen demand (mg/l)	688	192	186
5.	Bio-chemical Oxygen Demand (mg/l)	190	25	24
6.	Oil & Grease (mg/l)	7.2	BDL	BDL
7.	Sulphide (mg/l)	10	3.0	2.0
8.	Phenolic Compound (mg/l)	2.6	1.1	0.8
9.	Ammonical Nitrogen (mg/l)	2.8	4.9	12.9
10.	Total Chromium (mg/l)	BDL	BDL	BDL
11.	Sodium Absorption Ratio (SAR)	44.1	29.24	27.27
12.	Residual Sodium Carbonate (RSC) meq/l	9.55	5.60	5.20
13.	Bio-assay	-	80% survival of fish in 100% effluent after 96 Hrs.	80% survival of fish in 100% effluent after 96 Hrs.

Remarks :-

1. BDL means Below Method Detection Limit.
2. No specific standards are prescribed as per EPA, However if any stringent/other standards have been imposed by the board, the same shall prevail.

[Signature]
Junior Scientific Officer,
Zonal Lab, Ludhiana

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Ph 0161-2676350

Punjab Pollution Control Board

Zonal Laboratory, E-648-B, 2nd Floor,
Phase-5, Focal Point, Ludhiana.

E-mail: slabppcbldh@gmail.com

Water Analysis Report

1. Laboratory Sample no.: E 271/Zonal Lab/2023
2. Name of Industry : M/s Bahadurke Textile & Knitwear Association,
CETP-15 MLD, Ludhiana
3. Name of Sample Collecting Officer : Er. Bhisam, Assistant Environment Engineer
4. Type of Sample : Grab
5. Date of Sample Collection : 14.10.2023
6. Date of Receiving: 15.10.2023
7. Method Followed IS 3025/ methods of APHA

Results:

Sr. No.	Parameters	Inlet	Treated Water Storage Tank	Line Leading to Budha Nallah
1.	pH	8.0	8.1	8.0
2.	Total Suspended Solids (mg/l)	132	14	18
3.	Total Dissolved Solids (mg/l)	4310	2368	2502
4.	Chemical Oxygen demand (mg/l)	728	122	129
5.	Bio-chemical Oxygen Demand (mg/l)	190	21	23
6.	Oil & Grease (mg/l)	28.4	BDL	BDL
7.	Sulphide (mg/l)	2.8	1.4	1.6
	Phenolic Compound (mg/l)	1.9	BDL	BDL
9.	Ammonical Nitrogen (mg/l)	2.2	2.8	3.4
10.	Total Chromium (mg/l)	BDL	BDL	BDL
11.	Sodium Absorption Ratio (SAR)	53.9	25.4	26.2
12.	Residual Sodium Carbonate (RSC) meq/l	5.52	3.72	4.0
13.	Bio-assay		100% survival of fish in 100% effluent after 96 Hrs.	100% survival of fish in 100% effluent after 96 Hrs.

Remarks :-

1. BDL means Below Method Detection Limit.
2. No specific standards are prescribed as per EPA, However if any stringent/other standards have been imposed by the board, the same shall prevail.

30-10-23
 Junior Scientific Officer,
 Zonal Lab, Ludhiana

1023

R8-3

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BAHADUR KE TEXTILE & KNITWEAR ASSOCIATION (SPV)

(Company Regd. Under Companies Act, 1956)

(CIN- U93090PB2005NPL027846)

Ref. No.

BKTK/CTP/06/10

Dated: 21/6/2023

SH
22.6.23

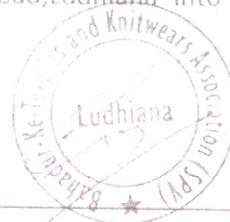
To
The Secretary,
Dept. of Science & Technology (Environment),
Govt. of Punjab.

Subject: Reply with regard to analysis results of wastewater samples collected by PPCB on 08.06.2023 from the inlet of the CETP and outlet of the CETP of 15 MLD capacity CETP installed at Bahadurke road, Ludhiana and outfall of the pipeline into the Budha Nallah.

Respected Sir,

With due respect, it is submitted that PPCB Ludhiana collected samples of wastewater on 08.06.2023 from the inlet of the CETP and outlet of the CETP of 15 MLD capacity CETP installed at Bahadurke road, Ludhiana and outfall of the pipeline into the Budha Nallah, which were sent to Punjab Biotechnology Incubator (PBTI), Mohali. The analysis results of PBTI, Mohali and the our submissions on these analysis results are given as under:

1. The analysis results of PBTI, Mohali of the wastewater samples collected from the inlet of the CETP, outlet of the CETP and outfall of the pipeline of 15 MLD capacity CETP installed at Bahadurke road, Ludhiana into the Budha Nallah, are given in Table-I:



Office : Swami Vivekanand Marg, Near Kali Mata Mandir, Bazigar Dera, Bahadur Ke Road,
Industrial Zone, Ludhiana-141008. (Pb.)
Contact : 98140-30105, 93575-03191, 93571-33001
E-mail : shribalaji.finishingmills@gmail.com bktk15mldcetp@gmail.com adinathdyeing@yahoo.co.in

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Table-I

Sr.No.	Parameters	Conc. of Parameters (mg/l except pH and SAR)		
		Inlet to CETP	Treated wastewater from storage Tank	Outfall into Budha Nallah
1.	pH	7.74	7.78	7.81
2.	TDS	5086	3766	3826
3.	TSS	153	49	37
4.	BOD	382	146	161
5.	COD	824	212	194
6.	Ammonical Nitrogen	BDL	BDL	BDL
7.	Phenolic Compounds	0.94	0.55	0.61
8.	Sulphide	1.4	BDL	BDL
9.	Total Chromium	0.02	BDL	BDL
10.	Oil & Grease	2.7	1.7	1.4
11.	SAR	33	28.6	27.2



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12.	RSC	3.9	1.6	1.1
13	Bio-Assay	-	-	70% survival in 100% effluent after 96 Hrs.

2. The comments on the above analysis results, are given as under:

- a) In the sample of wastewater collected from the inlet of CETP, the conc. of TSS,TDS,BOD and COD has been analyzed as 153 mg/l,5086 mg/l,382 mg/l and 824 mg/l,respectively. This shows that COD and BOD ratio of the untreated wastewater was 2.15.
 - b) Whereas, in the sample of wastewater collected from the outlet of the CETP, the conc. of TSS,TDS,BOD and COD has been analyzed as 49 mg/l,3766 mg/l,146 mg/l and 212 mg/l,respectively, which shows that COD and BOD ratio of the treated wastewater at the outlet of the CETP was 1.45.
 - c) In the sample of wastewater collected from the outfall of the pipeline carrying the treated wastewater of CETP for discharge into Budha Nallah, the conc. of TSS,TDS,BOD and COD has been analyzed as 37 mg/l,3826 mg/l,161 mg/l and 194 mg/l, respectively, which shows that COD and BOD ratio of the treated wastewater at the outfall of the pipeline carrying the treated wastewater of CETP was 1.20.
3. Theoretically, measurement of total BOD and COD in the wastewater is done as under:

BOD:

- Total BOD, mg/l = Soluble BOD, mg/l + BOD imparted by VSS in effluent, mg/l



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- Soluble BOD is imparted by the volatile component of the Total Soluble Solids

COD:

- COD is imparted by the volatile part of TSS and TDS and measurement of COD is done as Filtered, Particulate and Soluble.
- The filtered COD is imparted by dissolved organic compounds in the effluent and this COD is measured by passing the sample of effluent through a paper filter of known pore size i.e 1.5micron.This COD is contributed by volatile dissolved solids and a portion of colloidal solids.
- Particulate COD is imparted by suspended organic solids and is obtained as the difference of total COD and filtered COD.
- Soluble COD is contributed by only volatile part of dissolved solids.
- Stoichiometrically,

$$\Rightarrow \text{COD}_{\text{Total}} = \text{COD}_{\text{particulate}} + \text{COD}_{\text{colloidal}} + \text{COD}_{\text{soluble}}$$

$$\Rightarrow \text{COD}_{\text{insoluble}} = \text{COD}_{\text{particulate}} + \text{COD}_{\text{colloidal}}$$

$$\Rightarrow \text{COD}_{\text{soluble}} = \text{COD}_{\text{colloidal}} + \text{COD}_{\text{soluble}}$$

4. Further, we are checking/analysing the conc. of statutory parameters on daily basis in the Lab established in the premises of the CETP and the analysis results of the sample of untreated wastewater collected from the inlet of the CETP, treated wastewater collected from the outlet of the CETP and outfall into Budha Nallah are given in Table-II.

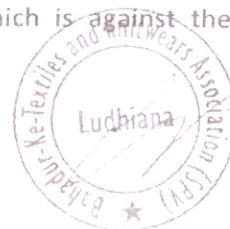
Table-II



Sr.No.	Parameters	Conc. of Parameters (mg/l except pH and SAR)		
		Inlet to CETP	Treated wastewater from storage Tank	Outfall into Budha Nallah
1.	pH	7.70	8.00	7.86
2.	TDS	4600	3590	3780
3.	TSS	220	40	38
4.	BOD	236	35	38
5.	COD	832	192	216

5. From the above, it is evident that:

- a. The analysis results of the wastewater in respect of BOD & COD analyzed by the PBTI are not as per the stoichiometric balance of COD & BOD given above. Further, as per established facts, the COD:BOD ratio after treatment should be on higher side as compared to untreated wastewater COD:BOD ratio. This is due to the fact that the biodegradable fraction of organic matter (BOD) is first degraded by the present microorganisms, while the more inert fraction of organic matter usually remains more constant during the wastewater treatment. Given that, BOD tends to decrease faster than COD, increasing then the COD:BOD ratio. However, as per analysis of wastewater samples, the COD:BOD ratio has decreased as compared to COD:BOD ratio of untreated wastewater, which is against the established facts.



- b. The analysis results of samples analyzed by the SPV in the Laboratory established in the premises of CETP are not inconsonance with the analysis results analyzed by PBTI. The analysis results analyzed by the SPV seem to be more realistic as compared to PBTI since during sampling the colour of the samples collected form the outlet of the CETP & Outfall into Budha Nallah was almost clear, which was noted down by us at the time of sampling.

In light of the facts mentioned above, it is requested that:

- a. Not to consider these misleading analysis results for any purpose.
- b. Resampling may please be got done for assessing the actual performance of the various components of the CETP. We would like to get a part of the samples of wastewater analyzed in our lab in the presence of official of the PPCB.

Thanks & Regards

For Bahadur ke Textile & Knitwear Association

For Bahadur-Ke-Textiles and Knitwears Association (SPV)

Chairman/Director

Director

CC

1. The Chairman, PPCB, Ludhiana.
2. The Member Secretary PPCB, Ludhiana.
3. The Chief Environmental Engineer, PPCB, Ludhiana
4. The Senior Environmental Engineer, PPCB, Ludhiana
5. The Environmental Engineer, PPCB, Ludhiana

बुड़े नाले को प्रदूषण मुक्त बनाने के प्रोजेक्ट की प्रोग्रेस रिव्यू करने के लिए एडीशनल कमिश्नर ने संबंधित विभागों के अधिकारियों से की मीटिंग

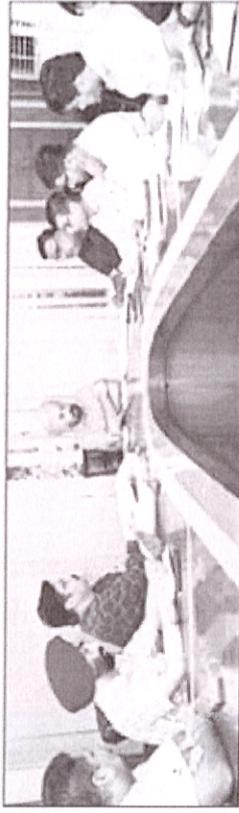
● बिजली कनेक्शन व मशीनरी के इंतजार में पंपिंग स्टेशन

लुधियाना, 6 अक्टूबर (हितेश): बुड़े नाले को प्रदूषण मुक्त बनाने के प्रोजेक्ट की प्रोग्रेस रिव्यू करने के लिए एडीशनल कमिश्नर परमदीप सिंह द्वारा संबंधित विभागों के अधिकारियों के साथ मीटिंग की गई।

इस दौरान सीवरेज बोर्ड के अधिकारियों ने बताया कि जमालपुर में 225 एम.एल.डी. का नया एस.टी.पी. बनाने के अलावा भट्टियां एस.टी.पी. अपग्रेडेशन का काम पूरा हो गया है, जबकि बलोंके एस.टी.पी. के एक यूनिट की अपग्रेडेशन का काम बाकी रहता है।

जहाँ तक बुड़े नाले में सीधे तौर पर गिरने वाले सीवरेज के पानी को एस.टी.पी. तक पहुंचाने के लिए लगाए जा रहे पंपिंग स्टेशन का सवाल है उसमें से ताजपुर व सुंदर नगर के यूनिट चालू हो गए हैं और कुंदन पूरी के यूनिट का ट्रायल किया जा रहा है, जबकि उपकार नगर व हैबोवाल के पंपिंग स्टेशन बिजली कनेक्शन व मशीनरी के इंतजार में हैं।

जो काम जल्द पूरा करने के



मीटिंग के दौरान एडीशनल कमिश्नर व अन्य अधिकारी।

डैडलाइन से 3 महीने लेट पूरा होगा डेयरियों में लगाए जा रहे ई.टी.पी. का निर्माण

नगर निगम द्वारा बुड़े नाले में डेयरियों का गोबर गिरने से रोकने के लिए ई.टी.पी. का निर्माण किया जा रहा है जिसे पूरा करने के लिए दिसम्बर तक की डैडलाइन फिक्स की गई है लेकिन मीटिंग के दौरान यह बात सामने आई है कि अभी ई.टी.पी. का निर्माण 40 फीसदी ही हुआ है जिसके मद्देनजर मार्च में प्रोजेक्ट पूरा होने की संभावना जताई जा रही है।



निर्देश एडीशनल कमिश्नर द्वारा नगर निगम के अलावा संबंधित विभागों सीवरेज बोर्ड व पावरकॉम के अधिकारियों को दिए गए हैं, क्योंकि सरकार के लैवल पर इस प्रोजेक्ट की रंगुलर मॉनिटरिंग की जा रही है।



लुधियाना (हितेश, राम): लोकल बोर्डॉज मंत्री बलकार सिंह के बाद राज्यसभा सदस्य संत बलवीर सिंह सीचेवाल द्वारा बहादुर के रोड सी.ई.टी.पी. की वर्किंग का जायजा लिया गया।

इस दौरान सी.ई.टी.पी. के प्रबंधकों ने रजनीश गुप्ता बताया कि साथ लगते एरिया की डाइगों को सी.ई.टी.पी. के साथ लिंक किया गया है। इस सी.ई.टी.पी. को कुछ समय पहले करोड़ों की लागत से अपग्रेड किया गया है जिसके चलते कैमिकल युक्त पानी को साफ करने के बाद प्रदूषण का लैवल डाऊन होने के मामले में बेहतर परिणाम आ रहे हैं जिसे लेकर संत सीचेवाल ने भी संतुष्टि जताई।

संत सीचेवाल ने कहा कि हवा-पानी के प्राकृतिक स्रोतों को प्रदूषण से बचाकर रखना हमारी जिम्मेदारी

बहादुर के रोड सी.ई.टी.पी. की वर्किंग का जायजा लेने के दौरान सेंट्रल चैक करते हुए संत सीचेवाल।

हे और सरकार द्वारा प्रदूषण विरोधी मुहिम को लोक लहर बनाने की दिशा में काम किया जा रहा है।

जहाँ तक बुड़े नाले के प्रदूषण का सवाल है, इस धरती को गुरु नानक देव जी की बख्शीश है जिन्होंने पर्यावरण को बचाने का संदेश दिया है जिसके मद्देनजर पंजाब सरकार बुड़े नाले के ऐतिहासिक पहचान वापस दिलाने के लिए प्रदूषण की वजह बन रहे स्रोतों को बंद करने की दिशा में काम कर रही है।

33 स्कैटर्ड डाइंग यूनिट्स के सीवर कनेक्शन काटने के लिए निगम ने जारी किए नोटिस

नोटिस में बताया, 15 दिन के भीतर कनेक्शन खुद कटवा लो, नहीं तो निगम के स्तर पर होगी कार्रवाई

सर्वरा न्यूज/दीपक

लुधियाना, 29 अक्टूबर: ताजपुर रोड और फोकल प्वाइंट में सी.ई.टी.पी. का हिस्सा रहे डाइंग यूनिट्स के सीवर कनेक्शन निगम की मैन लाइन से काटने के बाद नगर निगम अधिकारियों की टेढ़ी नजर अब स्कैटर्ड डाइंग यूनिट्स की तरफ गढ़ गई है। नगर निगम अधिकारियों ने 33 स्कैटर्ड डाइंग यूनिट्स के सीवर कनेक्शन काटने के लिए नोटिस जारी कर दिए हैं, जिनमें से अकेले 26 डाइंग यूनिट्स इंडस्ट्रियल एरिया से संबंधित हैं।

नगर निगम की ओर से जारी किए गए नोटिस में चेतावनी दी गई है कि संबंधित धारक अपने-अपने डाइंग यूनिट्स का डिस्चार्ज प्वांट (सी.ई.टी.पी.)

33 में से अकेले

26 डाइंग यूनिट्स इंडस्ट्रियल एरिया में

में डंप करने से परहेज करें। डाइंग यूनिट्स के संचालकों को 15 दिनों के भीतर अपनी-अपनी फैक्ट्रियों के सीवर कनेक्शन अपने आप ही कटवाने का समय दिया है। अधिकारियों ने चेतावनी दी है कि 15 दिन की मियाद पूरी होने तक कनेक्शन न काटे गए तो निगम अमला खुद कार्रवाई करने आएगा। बता दें कि ये वह 33 स्कैटर्ड डाइंग यूनिट्स हैं, जो अपनी फैक्ट्रियों के पानी को ट्रीट करवाने के लिए कॉमन इन्फ्लूेंट ट्रीटमेंट प्वांट (सी.ई.टी.पी.)



स्कैटर्ड डाइंग यूनिट की फाइल फोटो

का हिस्सा नहीं बन सके हैं। इन्हें सी.ई.टी.पी. से जुड़ने अथवा जोरो लिक्वेड डिस्चार्ज (जेड.एल.डी.) में से कोई एक विकल्प चुनने का मौका समय-समय पर मिलता रहा है। आखिरी बार दी गई डेड लाइन भी

मार्च 2023 में खत्म हो चुकी है। पंजाब पॉल्यूशन कंट्रोल बोर्ड की ओर से कुछ महीने पहले ही नगर निगम को स्कैटर्ड डाइंग यूनिट्स के सीवर कनेक्शन काटने के लिए पत्र जारी किया जा चुका है लेकिन डाइंग

यूनिट्स की ओर से जनप्रतिनिधियों से राहत की गुहार लगाते हुए उनकी आवाज सरकार तक पहुंचाने की मांग लगातार की जा रही है। इंडस्ट्रियल एरिया में स्कैटर्ड डाइंग यूनिट्स के लिए सी.ई.टी.पी. लगाने के लिए एक जगह का मौका भी अधिकारी तथा जनप्रतिनिधि देख चुके हैं लेकिन अभी यह प्रस्ताव सिर नहीं चढ़ा है। नाम न छपाने की शर्त नगर निगम के एक आलाधिकारी ने बताया कि डाइंग यूनिट्स के शिफ्टमंडल की ओर से जनप्रतिनिधियों के साथ मुलाकात की गई थी। उद्यमियों ने मांग की थी कि राहत संबंधी वे पंजाब सरकार के समक्ष अपनी बात रखना चाहते हैं। जब तक सरकार की ओर से उनका पक्ष सुनकर कोई फैसला नहीं ले लिया जाता तब

तक उनके खिलाफ कार्रवाई न क जाए। निगम अधिकारी के अनुसार अब काफी समय बीत गया है, सरकार के स्तर पर लिखित में उन्हें कोई नोटिस नहीं मिले है। वहीं कार्रवाई संबंधी पी.पी.सी.बी. की ओर से उन्हें लगातार रिमांडर भेजे जा रहे हैं। डाइंग यूनिट्स का पानी सीवर लाइन के जरिये सीवरज ट्रीटमेंट प्वांट में पहुंच रहा है, जिस कारण पानी को मानकों के मुताबिक ट्रीट करना मुश्किल हो रहा है, इसलिए डाइंग उद्यमियों को 15 दिनों का समय देते हुए यह भी कहा गया है कि अगर उन्हें राहत संबंधी कोई आश्वासन लिखित में मिला है तो दस्तावेज निगम प्रशासन को जमा करवाए जाएं ताकि कार्रवाई करने से पहले पुनर्विचार किया जा सके।

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PUNJAB POLLUTION CONTROL BOARD Zonal Office-1, E-648-B, Phase-V, Focal Point, Ludhiana		
Tele Fax:- 0161-4673789	Website:- www.ppcb.gov.in	email:- ppcbzo1ldh@ppcb.gov.in

No. 3054-55 Speed Post/online Dated 27/6/23.

To
M/s Sharman Woollen Mills Private. Limited,
VPO Jugiana, G T. Road,
Ludhiana.

Sub:- Notice to issue directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974.

Whereas, it is mandatory on the part of industry to obtain the 'consent to operate' of the Board under Water (Prevention & Control of Pollution) Act, 1974 for discharge of effluent from its industrial premises and to operate an industrial plant.

And whereas, it is also mandatory on the part of industry to install proper and adequate pollution control devices/ facilities so that the concentration of various pollutants discharged by it conforms to the effluent standards prescribed by the Board.

And whereas, the industry is a medium scale red category dyeing unit. The industry has been granted consent to operate under Water Act, 1974 vide no. CTOW/Fresh/LDH2/2022/18093388 dated 29.4.2022, valid upto 28.04.2023 for discharge of treated trade effluent @ 175 KLD into sewer.

And whereas, the Department of Science, Technology & Environment, Government of Punjab considering all the aspects of the matter including various recommendations and decisions of the Hon'ble High Court, NGT and other Committees has issued directions u/s 5 of Environment (Protection) Act, 1986 vide letter dated 10.10.2019 that industrial effluents and dairy waste whether treated / partially treated or untreated shall not be discharged into municipal sewer of Ludhiana.

And whereas, a meeting was taken by Competent Authority of the Board on 13.07.2022 to review the compliance of directions u/s 5 of Environment (Protection) Act, 1986 issued by the Department of Science, Technology & Environment, Government of Punjab vide above directions dated 10.10.2019 for segregation of industrial effluents discharged into municipal sewer of Ludhiana, wherein it was decided as under:

1. All the water polluting industries (except garment washing and service stations) discharging their effluent into municipal sewer, Ludhiana shall take adequate steps to stop discharging their industrial effluent into municipal sewer, Ludhiana by 31.03.2023 and period of consent be reduced suitably to ensure compliance of the directions given by the Govt.
2. The above additional condition shall be imposed on all the industries having valid consent to operate under the Water (Prevention & Control of Pollution) Act, 1974, if not already imposed.
3. Directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 be issued to the industries not having valid consent to operate under Water (Prevention & Control of Pollution) Act, 1974 for imposing above condition as well as to obtain consent to operate of the Board, within 15 days.
4. Notice u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 for closure of all scattered dyeing units of Ludhiana be issued with opportunity of personal hearing before Competent Authority.

And whereas, in compliance to the decisions, vide letter no. 4980 dated 28.10.2022, the validity of consent to operate granted to the industry under the Water (Prevention & Control of Pollution) Act, 1974 has been curtailed upto 31.03.2023 with a special condition that the industry shall take adequate steps to stop discharging their industrial effluent into municipal sewer, Ludhiana by 31.03.2023.

And whereas, the industry was issued notice u/s 33-A of the Water Act, 1974 with hearing before Chairman of the Board on 27.02.2023.

And whereas, it was also informed that the industry has applied for renewal of consent to operate under the Water (Prevention & Control of Pollution) Act, 1974.

And whereas, after hearing the representative of the industry, officers of the Board, the Chairman of the Board decided that:-

1. The industry shall continue to operate its pollution control devices, regularly and efficiently so as to achieve the prescribed standards.
2. The industry shall not increase the capacity of dyeing machinery resulting in increased discharge of effluent beyond its consented quantity.

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3. As the relaxation in time upto 31.03.2024 has only been given to large scale dyeing units and this industry falls under medium scale, so direction u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 be issued to the industry that the industry shall not discharge its industrial effluent into municipal sewer after 31.03.2023.
4. In view of the directions issued by the Board to the industry regarding stopping discharge of industrial effluent into MC sewer by 31.03.2023, the industry shall submit scheme to achieve Zero Liquid Discharge (ZLD), within 15 days.
5. The application applied by the industry for obtaining consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 be returned.
6. The Environmental Engineer, Regional Office-2, Ludhiana shall visit the industry immediately after 31.03.2023 and shall send further recommendations in the matter.

And whereas, the proceeding of personal hearing held before Chairman of the Board on 27.02.2023 have been conveyed to industry vide letter no. 1245 dated 20.03.2023.

And whereas, vide letter no. 1342 dated 24.03.2023, the directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 have been issued to the industry that the industry shall not discharge its industrial effluent into municipal sewer after 31.03.2023.

And whereas, the industry has failed to comply with directions issued to it to stop discharging its industrial effluent into MC sewer by 31.3.2023.

And whereas, the matter has been considered by the Competent Authority and it has now been proposed to issue following directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 to the industry, after giving an opportunity of personal hearing before Chairman of the Board:-

1. The industry will dismantle and remove all outlets and stop discharging its industrial effluent into sewer or drain or through any other mode.
2. The PSPSL authorities will be directed to disconnect electric supply available to the industry/ premises.
3. The wet process of the industry will be sealed.
4. The Municipal Corporation will be directed to disconnect sewerage connection available with the industry for discharge of its industrial effluent.
5. Legal action under the provisions of section 41 of the Water Act, 1974 will be taken against the industry.
6. Environmental Compensation will be imposed on the industry for the damage caused to the environment.

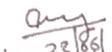
As such, some responsible person like Proprietor/Director/ Partner from the industry, who is in a position to take decisions, regarding compliance of the provisions of Pollution Control Laws, should appear before the **Chairman of the Board at 1st Floor, E-648-B, Phase-V, Focal Point, Ludhiana on 30.06.2023 at 09:30 AM** to explain the position in this regard, in person, failing which the proposed directions shall be confirmed, without giving further opportunity/ notice


23/06/23
cc Environmental Engineer

Endst. No.

Dated

A copy of the above is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-2, Ludhiana for information & necessary action. He is requested to ensure the delivery of notice to the industry and also inform the industry regarding date of hearing and send report to this office.


23/06/23
cc Environmental Engineer

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BAHADUR KE TEXTILE & KNITWEAR ASSOCIATION (SPV)

(Company Regd. Under Companies Act, 1956)

(CIN- U93090PB2005NPL027846)

Ref. No. BKTK/CE7P/08/05

Dated: 25/8/2023

To
The Secretary
Science, Technology & Environment
Govt of Punjab.

**Subject: Request for parity of treatment level at 15 MLD CETP with
40 MLD and 50 MLD CETP at Ludhiana,**

Ref : Letter of PPCB dated 30.6.2023

Sir

This is to bring to your kind attention that PPCB is repeatedly directing us to upgrade 15 MLD CETP for our member dyeing units without appreciating full facts and circumstances of construction of secondary level treatment based 15 MLD CETP in complete knowledge and with absolute consent of PPCB. PPCB is refusing to grant parity for treatment level at 15 MLD CETP with treatment level permitted by it to 40 MLD and 50 MLD CETPs for member dyeing units at Ludhiana. A copy of latest letter of PPCB dated 30.6.2023 is enclosed as **Encl 1**.

we are a non profit company formed under Sec 25 of Company Act for sole purpose of construction and operation/ maintenance of 15 MLD

Office : Swami Vivekanand Marg, Near Kali Mata Mandir, Bazigar Dera, Bahadur Ke Road,
Industrial Zone, Ludhiana-141008. (Pb.)
Contact : 98140-30105, 93575-03191, 93571-33001
E-mail : shribalaji.finishingmills@gmail.com bktk15mldcetp@gmail.com adinathdyeing@yahoo.co.in



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CETP for our member dyeing units, with grant in aid made available by Central (50%) and State Govt (25%) under a central scheme for setting up of CETPs. The remaining cost is borne by member industries.

The said company was formed with persuasion, guidance and cooperation of PPCB in the year 2008 , only on learned assurance of PPCB that the CETP will be best solution for economically viable and technical feasible treatment of dyeing industry effluents without any hassle. PPCB assured its full support and technical guidance for the success of the project.

The industries of 5 industrial areas namely. Tajpur Road, Focal Point, Industrial Area A, Bahadurke Road and Rahon Road joined hands to set up a CETP and for that purpose obtained EC from MoEFCC for setting up said CETP of 117 MLD capacity based on SBR technology, vide letter dated 3.5.2013. A copy of said EC is enclosed as **Encl 2**.

However, at that stage, it was impressed upon us by some consultants and officials that requirement of treating water up to zld level is soon going to be compulsory.



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Under above mentioned scenario , we applied for Environmental Clearance for establishment of Zero Liquid Discharge (ZLD) based 15 MLD CETP as advised by PPCB. The EC was granted by MoEFCC vide letter number **F.No.10-119/2011-IA.III** dated **12.03.2012** A copy of said EC is enclosed as **Encl-3**.

There after we applied to MoEFCC for sanction of 15 MLD CETP on the basis of a DPR duly vetted and recommended by PPCB to MoEFCC for grant in aid as per their Scheme for setting up CETPs for a total cost of RS **162 cr**. The DPR was prepared for tertiary level ZLD basis CETP as per the EC earlier obtained for the 15 MLD CETP from MOEFCC.

MoEFCC sanctioned the 15 MLD ZLD based CETP for grant in aid under the Central Scheme vide letter no **F.No.10-119/2011-IA.III** dated **08.12.2014**. A copy of sanction letter is enclosed as **Encl 4**. As per requirement of the Central Scheme, 25 % of the cost of CETP was required to be borne by member industries. Therefore we applied for loan from banks for an amount of Rs **108 cr** . Upon assessment of the loan application , despite of our best efforts, the banks refused to extend loan observing that the project is techno economically unviable during discussion.



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We accordingly appraised the PPCB of refusal of bank to extend loan. As advised by the then officials of PPCB, we applied for revision of sanction granted by MoEFCC for ZLD based 15 MLD CETP for grant in aid, through PPCB proposing to construct only secondary level treatment instead of tertiary level ZLD based treatment of effluents at proposed CETP.

The MoEFCC granted its sanction for the secondary level treatment project, as recommended by PPCB with observation that ZLD level upgradation project may be submitted in second phase to MoEFCC for sanction of grant in aid. A copy of MoEFCC revised sanction vide letter no **F.NoQ-15017/22/2014-CPW** dated **18.03.2016** is enclosed at **Encl 5**. Obviously we were not required for any fresh EC since the EC for five industrial areas including Bahadurke Road was already granted by MoEFCC as at Encl 2.

The design of CETP in the DPR submitted to MoEFCC, duly recommended by PPCB, was based on certain assumed inlet parameters and predicted certain outlet parameters after proposed treatment at CETP.



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It is pertinent to mention here that during same period when we were making efforts to establish 15 MLD CETP , efforts were also being made by PDA Focal Point and PDA Tajpur Road for construction of 40 MLD and 50 MLD CETP respectively. Since, the State Govt and PPCB were supporting the projects, the progress of these projects was being monitored regularly at both levels.

In one such monitoring meeting of the state govt on dated **16.05.2016**, the before the actual construction of 15 MLD CETP, on direction/ decision taken in the said meeting of State Govt, the 15 MLD CETP was redesigned on SBR based secondary level treatment and the same was informed to MoEFCC by PPCB vide its letter no. **PPCB/CEE/LDH/2017/6548** dated. **21.12.2017** . A copy of minutes of meeting of State Govt dated ... are enclosed at **Encl 6**. The design for CETP was adopted as per said decision in line with fact that 40 and 50 MLD CETP for dyeing units at Ludhiana are also based on same technology, more so as the EC for CETP for 5 areas was based on SBR technology.

It is pertinent to mention here that said two CETPs of 40 MLD and 50 MLD capacity are also duly sanctioned by MoEFCC on recommendation



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of PPCB. No condition/ requirement for zld level treatment in second phase has been imposed by MocFCC upon said 40 MLD and 50 MLD CETP in the sanction accorded to these by MoEFCC. A copy each of sanction of 40 MLD and 50 MLD CETPs by MoEFCC are enclosed at **Enc 7 and 8 .**

All the three CETPs of 15 MLD, 40 MLD and 50 MLD capacity have since been constructed and under operation for treating effluent of their respective member dyeing units at Ludhiana.

That all the three CETPs at Ludhiana sanctioned for treatment of effluent of member dyeing units are permitted to use treated water for irrigation. Our 15 MLD CETP is specifically permitted to discharge treated effluent in to buddha nala. For this purpose we had to lay 5.9 Km long carrier pipe from CETP outlet to Buddha Nala after obtaining all necessary clearances from concerned authorities, at an additional cost of about Rs 6.5 crore.

That the work for construction of CETP as per DPR was granted to M/S Saurabh Construction Pvt Ltd vide letter dated **03.02.2017** The Copy of the Contract Bond was also provided to PPCB during meeting of



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managing committee dated **23.11.2017**. That during entire construction and commissioning phase the work of 15 MLD CETP has been carried out as per the SPV and its managing committee constituted as per directions contained in order of PPCB dated 12.7.2017. It included technical and financial officers of Govt departments/ experts as prescribed by said order and all bill are paid through PPCB as per verification by a bill verification committee comprising of PPCB prescribed officials where no representative of member units was available. Under such arrangement, the said CETP was commissioned in Jan 2020 and after its trial run it was fully commissioned in July 2020.

It is also not out of place to mention here that said scheme for setting up CETP/ its upgradation etc launched by MoEFCC in year 1992 has since been closed since April 2017.

As already submitted, the CETPs at Ludhiana including 15 MLD CETP are result of a series of assurance of PPCB and State Govt. It include an assurance of state Govt and PPCB that entire treated effluent and sewage of Ludhiana entering buddha nala will be utilised for irrigation purpose for which irrigation department shall prepare scheme. Accordingly, the Govt of Punjab has prepared a project of use of



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treated water at CETP and STPs of Ludhiana irrigation pf agricultural land falling between Buddha Nala at Satluj River at Ludhiana. The same is relied by MoEFCC while granting EC for the CETP for dyeing units at Ludhiana. The above said is reiterated by Govt of Punjab in the Action Plan for river Satluj, prepared in 2019 as per directions of this Hon'ble Tribunal in a separate matter. Para 6.3 at page 27 of said Action plan states in respect of reuse of waste water in Buddha Nala at Ludhiana " Lower buddha nala can be revived to use treated waste water of Ludhiana City carried by Buddha Nala (presently being discharged in to river Satluj) for irrigation purposes. State level steering committee in its meeting held on 30.11.2018 has decided that Department of Water Resources shall prepare a detailed action plan for this purpose in a period of two months in consultation with Commissioner, Municipal Corporation , Ludhiana and Punjab Pollution Control Board." It is in pursuance of said objective that 200 cusec raw water is also being released in Buddha Nala since last more than



one year. However, said project has still not been implemented on ground.

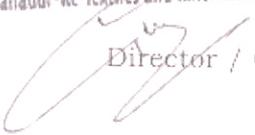
In view of the facts submitted above, we request you to kindly direct PPCB to grant us parity with 40 MLD and 50 MLD CETPs at Ludhiana in the matter of level of treatment required to be provided at CETPs.

Thanking you

Yours Sincerely

For Bahadur Ke Textile & Knitwear Association

For Bahadur-Ke-Textiles and Knitwears Association (SPV)


Director / Chairman
Director

CC:

1. The Chairman-Punjab Pollution Control Board
2. The Member Secretary - Punjab Pollution Control Board