

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, NEW DELHI  
(PRINCIPAL BENCH)**

Original Application No. 225 of 2022

**In the matter of**

Nitin Dhiman

..... Applicant

V/s

State of Punjab

..... Respondent

Reply on behalf of the respondent no. 2, the Punjab Pollution Control Board, through Environmental Engineer, Regional Office-3, Ludhiana in compliance to order dated 24.1.2023.

**RESPECTFULLY SHOWETH**

- 1) That briefly stated, the applicant Mr. Nitin Dhiman resident of 1203, Princeton Tower, Omaxe, Pakhowal Road, Ludhiana has filed letter petition before the Hon'ble National Green Tribunal alleging the pollution of Budha Nallah, river Sutlej and groundwater.

The Hon'ble National Green Tribunal vide order dated 26.4.2022 has constituted a Joint Committee comprising of Central Pollution Control Board, State Pollution Control Board and Municipal Corporation, Ludhiana and called a report from the Committee. The Joint Committee has filed report before the Hon'ble National Green Tribunal in compliance of order dated 26.4.2022. A copy of the report is enclosed herewith as **Annexure R 2/A** for kind perusal.

- 2) That in view of the averments made in the application and the observations and recommendations made by the Joint Committee in its report, the Hon'ble National Green Tribunal was pleased to call response of the respondents i.e. the State of Punjab through Chief Secretary, Punjab; State Pollution Control Board; Municipal Corporation Ludhiana and District Magistrate, Ludhiana by passing an order dated 10.10.2022. In compliance to order dated 10.10.2022, a consolidated reply was filed, however, vide order dated 24.1.2023, the Hon'ble Tribunal had issued directions for separate replies of the respondents.

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The present separate reply on behalf of respondent Punjab Pollution Control Board is being filed in compliance to order dated 24.1.2023.

- 3) That the answering officer is presently working as Environmental Engineer in Regional Office-3 of the Punjab Pollution Control Board at Ludhiana and as such is conversant with the facts of the present case and is duly authorized and competent to file the present reply in his official capacity on behalf of Punjab Pollution Control Board.
- 4) That in reference to the application, it is respectfully submitted that about 300 dyeing units are operating in the area of Ludhiana District, out of which about 252 units fall in the catchment area of Budha Nallah, which originates in village Koom Kalan of District Ludhiana and runs parallel to River Sutlej on its south till Budha Nallah joins River Sutlej at Village Walipur Kalan.

For the treatment of wastewater of the dyeing industries, 03 Common Effluent Treatment Plants (CETPs) of total capacity 105 MLD have been installed at Ludhiana by the Special Purpose Vehicles (SPVs). The details regarding dyeing cluster, capacity of CETPs, site of installation, technology with name of SPV and existing member units are given herein below:

S.No.	Dyeing Cluster of Ludhiana City	Capacity of CETP	Site of installation	Name of Special Purpose Vehicle (SPV)	Based on Technology	Existing Member Units	Disposal of treated wastewater
1	Bahadurke Road	15 MLD	Bahadurke Road	Bahadurke Textile and Knitwear Association (BKTKA), Ludhiana	SBR	32	Budha Nallah
2	Tajpur Road	50 MLD	Tajpur Road	Punjab Dyers Association (PDA), Tajpur Road, Ludhiana	SBR	103	Budha Nallah
3	Focal Point	40 MLD	Tajpur Road	Punjab Dyers Association (PDA), Focal Point, Ludhiana	SBR	63	Budha Nallah
Total	03	105 MLD	03		-	198	

- 5) That apart from the above mentioned 198 dyeing units, about 54 dyeing units are such which could not join the CETPs due to geographical reasons and scale of the industries. Out of these 54 dyeing units, 12 units are of large scale category, 16 units are of small category scattered at different places and 26 units are situated at Industrial Area-A. All these 54 dyeing units are having their own captive effluent treatment plants for the treatment of wastewater

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and discharge their treated wastewater into public sewer for which standards have been laid down by the MOEF&CC, Government of India.

- 6) That after the installation and commissioning of CETPs for the wastewater treatment of dyeing industries, the domestic and industrial effluent of these industries stands segregated from the domestic sewerage of Ludhiana city. However the treated wastewater of 54 dyeing units which are having captive effluent treatment plants is being discharged and further treated in Sewage Treatment Plants installed by Municipal Corporation, Ludhiana for domestic sewage.
- 7) That the three Common Effluent Treatment Plants (CETPs) are being monitored on monthly basis by the Punjab Pollution Control Board and recently the effluent samples of the CETP 50 MLD and 40 MLD were collected by the officers of the Board in the month of February, 2023 and whereas the effluent sample of CETP 15 MLD were collected in the month of January, 2023. The analysis results of the samples collected by the Board officers reveals as under:
  - a) The CETP of 50 MLD capacity was found to be achieving the prescribed standards of MOEF&CC, Government of India except the parameter of TDS only.
  - b) The CETP of 40 MLD capacity was found to be achieving the prescribed standards of MOEF&CC, Government of India except the parameters of TDS and BDO only.
  - c) The CETP of 15 MLD CETP was found to be not complying with the standards of MOEF&CC, Government of India.
- 8) That the Punjab Pollution Control Board has directed the CETP 50 MLD, CETP 40 MLD and 15 MLD CETP to achieve the stringent standard as prescribed in the DPR submitted by the SPVs. The Punjab Pollution Control Board has taken several meetings with CETP 50 MLD and CETP 40 MLD to explore the possibility for utilizing the treated effluent onto land for plantation and irrigation.

The third CETP of 15 MLD capacity at Bahadurke Road is not meeting with the standards prescribed by MoEF&CC, Government of India. The respondent Board is regularly pursuing with the SPV, Bahadurke Textile and Knitwear Association (BKTKA) of CETP 15 MLD for proper and adequate operation of the CETP. After regular persuasion by the respondent Board the SPV has added the Diffused Air Flootation (DAF) system alongwith the existing

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components of CETP, having total cost of about 2.5 crores, to improve the quality of treated effluent.

The SPV had also taken the shut-down of the member units of the CETP 15 MLD for 02 days on 04.02.2023 and 05.02.2023 to carryout cleaning of Chlorine Contact Tank (CCT) and Treated Water Storage tank of CETP. In these 02 days the SPV had removed about 8-9 Ton of sludge from the CCT and Treated Water Storage Tank manually and also completed the installation work of 02 sludge De-watering machines of capacity 25 m<sup>3</sup>/hr. The trial run of newly installed boiler for the steam drying of sludge has also been started. With these up-gradations, there are good chances of improvement in the quality of final treated effluent of the CETP.

Apart from the above, the respondent Board has also imposed Environmental Compensation of Rs. 77,62,500/- upon M/s Bahadurke Textile and Knitwear Association, 15 MLD CETP for violation of environmental norms.

- 9) That it is relevant to mention here that the grievances of the applicant Sh. Nitin Dhiman were found to be not factually correct, in view of the facts and figures mentioned herein above in the reply. The applicant has alleged that around 400 dyeing units are operating in Ludhiana city, consuming 3 crore liters of ground water for washing and dyeing daily and discharging approximately 300 MLD chemical mixed untreated water directly in Budha Nallah through municipal sewer. However, upon examination, it has been observed that about 300 dyeing units are operating in the area of Ludhiana District, out of which 252 units fall in catchment area of Budha Nallah. 198 Dyeing unit members have joined the three CETPs installed and commissioned in Ludhiana.

The three CETPs are having the total capacity to treat the wastewater of 105 MLD. It is pertinent to mention here that against the total capacity to treat the wastewater of 105 MLD, the CETPs are receiving the total trade effluent of about 93-94 MLD.

54 dyeing units, which could not join the CETPs are having their own captive treatment plants and are discharging about 25 MLD of treated wastewater into municipal sewer which further leads to Budha Nallah. The details have already been given in the reply above and have also been given by the Joint Committee in its report already submitted before this Hon'ble Tribunal. It is pertinent to mention here that the remaining dyeing industries fall outside the catchment area of Budha Nallah and are discharging their

*Sandeep Kumar*

treated effluent onto land for plantation or are having the arrangement of Zero Liquid Discharge.

The second grievance of the applicant has also been examined wherein it is alleged that MoEF&CC had issued the Environmental Clearance to Bahadurke Road 15 MLD CETP for setting of this CETP on the basis of Zero Liquid Discharge (ZLD) technology but said CETP has been installed without ZLD technology. Upon examination of the grievance, it is observed that in the first instance, the Environmental Clearance for 117 MLD was issued by the Ministry of Environment and Forest to Punjab Dyers Association on 03.05.2013 and Environmental Clearance for 15 MLD CETP was issued by MoEF&CC to M/s Bahadurke Textile and Knitwear Association Ltd. on 08.12.2014. The MoEF&CC has imposed a condition in the Environmental Clearance granted to M/s Bahadurke Textile and Knitwear Association Ltd. dated 08.12.2014 that the proponent shall maintain zero discharge. A copy of letter dated 08.12.2014 vide which Environmental Clearance was granted by the MoEF to M/s Bahadurke Textile and Knitwear Association Ltd. is enclosed herewith as **Annexure R 2/B**. However, vide another letter dated 18.03.2016, the Government of India, Ministry of Environment, Forest and Climate Change while examining the new proposal of CETP has recommended and approved the proposal of M/s Bahadurke Textile and Knitwear Association Ltd. to initiate the CETP based on conventional treatment system in Phase-1 with adoption of ZLD in Phase-2, for which the Association will apply to the MoEF&CC at a later stage as an up-gradation case. A copy of letter dated 18.03.2016 issued by the Government of India, Ministry of Environment, Forest and Climate Change to M/s Bahadurke Textile and Knitwear Association Ltd. is enclosed herewith as **Annexure R 2/C**. It is pertinent to mention here that the Joint Committee has also examined these facts and the same have been mentioned in the report of the Joint Committee.

The Board has written letter no.7328 dated 2.12.2022 to the SPV, CETP of 15 MLD Bahadurke Road, Ludhiana with direction to take corrective measures to achieve prescribed standards and to adopt the ZLD scheme after getting necessary permissions/ approvals from the MoEF&CC and a copy of the letter dated 2.12.2022 is enclosed herewith as **Annexure R 2/D**.

- 10) That in view of the above stated facts and examination of the case, it is respectfully submitted that all the Common Effluent Treatment Plants in Ludhiana are working and operating regularly. However, on the directions of the Board, efforts are being made by the SPVs of the CETPs to comply with the stringent standards prescribed in the DPRs.

*Sandeep Kumar*

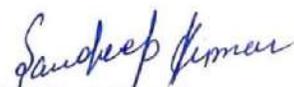
- 11) However, it is respectfully submitted that the Government of Punjab, its Departments and its instrumentalities including the Board, and Corporation, are seized of the matter relating to the prevention and control of pollution in Budha Nallah and River Sutlej for which the Government has already submitted action plan to the Central Pollution Control Board and Ministry of Environment, Forest and Climate Change and all the departments of the Government of Punjab are making sincere and concerted efforts to complete the pending works within the time lines. The Punjab Pollution Control Board has already taken appropriate action on the recommendations of the Joint Committee constituted by the Hon'ble National Green Tribunal in the present case and the details have been mentioned in the preceding paragraphs of the reply.
- 12) That in view of the submissions made herein above, the application filed by Mr. Nitin Dhiman does not survive for any further consideration and is liable to be rejected by this Hon'ble Tribunal.

It is, therefore, prayed that the Original Application no. 225 of 2022 may kindly be disposed of with appropriate orders.

**Submitted by**

Date: 17/3/2023

Place: Ludhiana

  
(Sandeep Kumar)  
Environmental Engineer,  
Punjab Pollution Control Board  
Regional Office-3, Ludhiana

**Verification**

Verified that the contents of para no.1 to 12 of the above reply are true and correct to my knowledge as derived from the official record. No part of the above reply is false and nothing material has been kept concealed therein.

Date: 17/3/2023

Place: Ludhiana

  
(Sandeep Kumar)  
Environmental Engineer,  
Punjab Pollution Control Board  
Regional Office-3, Ludhiana

R2/A



## PUNJAB POLLUTION CONTROL BOARD

Zonal Office-II, E-648-B, Backside CICU Office, Phase-5, Focal Point, Ludhiana

Ph:- 0161-2670141

E-Mail: seezo2ldhppcb@yahoo.com

No. PPCB/SEE/ZO-2/LDH/2022/...SPL-I

Dated ...09/10/2022

To

The Registrar,  
National Green Tribunal,  
New Delhi

**Sub:- Hon'ble National Green Tribunal Order dated 26.04.2022 in OA no 225 / 2022 in the matter of Nitin Dhiman Vs. State of Punjab.**

In reference to above, It is intimated that Hon'ble NGT vide its order dated 26.04.2022 in OA no 225 / 2022 in the matter of Nitin Dhiman Vs. State of Punjab has directed as under:-

*"In view of the allegations made in the present letter petition, we considered it appropriate to have a factual and action taken report from a Joint Committee comprising of CPCB, State PCB and Municipal Corporation, Ludhiana. The state PCB will be the Nodal agency for coordination and compliance. The Joint Committee may meet within four weeks, undertake site visits, look into the grievances of the applicants and take requisite action by following due process of law. Factual and action taken report may be furnished within two months by e-mail at [judicial-ngt@gov.in](mailto:judicial-ngt@gov.in) preferably in the form of searchable PDF/OCR support PDF and not in the form of image PDF."*

In compliance of order dated 26.4.2022, the report of Joint Committee is submitted for consideration and appropriate orders of the Hon'ble National Green Tribunal please.

DA/ Report of Joint Committee

9/10/22  
Senior Environmental Engineer  
Punjab Pollution Control Board  
Zonal Office-2 Ludhiana

**Report of Joint Committee****Compliance of order dated 26.4.2022 passed by the Hon'ble National Green Tribunal in Original Application No. 225/2022 in the matter of "Nitin Dhiman Vs State of Punjab"****1.0 Brief Background**

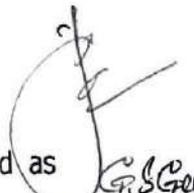
Mr. Nitin Dhiman resident of 1203, Princeton Tower, Omaxe, Pakhowal Road, Ludhiana has filed letter petition before the Hon'ble National Green Tribunal with the grievance that around 400 dyeing units are operating in Ludhiana district, consuming about 3 crore liters of ground water for washing and dyeing daily and discharging approximately 300 MLD chemical mixed untreated water directly in Buddha Nullah through local Municipal Sewerage which finally goes to River Satluj thereby causing dangerous diseases like cancer and skin problems.

It is mentioned in the letter petition that Ludhiana dyeing industry allegedly installed 3 CETP plants with the capacity of 105 MLD in different locations. MOEF & CC had issued the environment clearance for setting up of one CETP on the basis of Zero Liquid Discharge (ZLD) technology but said CETP has been installed without ZLD Technology. Other two CETPs are under construction for more than one decade. Around 125 dyeing units are situated in scattered area which do not have CETP.

It is further mentioned in the letter petition that Buddha Nullah originates in village Koom Kalan, Ludhiana and runs parallel to the Satluj River on its south till it joins it at Walipur Kalan. It used to be a fresh water channel with about 56 types of fish species prior to 1964 but now it is alleged to have been polluted to such an extent that it has no fish because of the high level toxicity in the water and, therefore, issue of very high pollution of river and ground water is involved.

**Order passed by the Hon'ble National Green Tribunal**

In view of the allegations made, the letter petition was treated as Original Application no. 225 of 2022 titled as Nitin Dhiman v/s State of Punjab and the Hon'ble National Green Tribunal considered it appropriate to have a factual and action taken report in the matter from a Joint Committee comprising of the Central

  
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Pollution Control Board, State PCB, Municipal Corporation, Ludhiana. The State PCB was declared to be the Nodal agency for coordination and compliance and a report from the Joint Committee was sought by the Hon'ble National Green Tribunal within two months via email. The relevant extract of the order dated 26.4.2022 passed in O.A No. 225 of 2022 is reproduced herein below:

"In view of the allegations made in the present letter petition, we consider it appropriate to have a factual and action taken report from a Joint Committee comprising of CPCB, State PCB and Municipal Corporation, Ludhiana. The State PCB will be the Nodal agency for coordination and compliance. The Joint Committee may meet within four weeks, undertake site visits, look into the grievances of the applicants and take requisite action by following due process of law. Factual and action taken report may be furnished within two months by e-mail at [judicial-ngt@gov.in](mailto:judicial-ngt@gov.in) preferably in the form of searchable PDF/OCR Support PDF and not in the form of Image PDF."

## **2.0 Scope of work of the Joint Committee:**

The Joint Committee comprising of Central Pollution Control Board, Punjab Pollution Control Board and Municipal Corporation, Ludhiana has been asked to meet within four weeks, undertake site visits, look into the grievances of the applicants and take requisite action by following due process of law. Factual and action taken report has been sought from the Joint Committee by the Hon'ble National Green Tribunal vide order dated 26.4.2022 within 02 months via email @ [judicial-ngt@gov.in](mailto:judicial-ngt@gov.in) preferably in the form of searchable PDF/OCR Support PDF and not in the form of Image PDF.

## **3.0 Action taken by the Joint Committee:**

### **3.1 Interaction and Discussion**

In compliance of order dated 26.04.2022 passed by the Hon'ble National Green Tribunal, the meeting of joint committee was held on 20/09/2022 at 10 AM in the Committee Room of Punjab Pollution Control Board, Phase-5, Focal

  
G.S. Gill  
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Point Ludhiana to deliberate that matter. The following members were present in the meeting:

- a) Sh. G.S. Gill, Senior Environmental Engineer, Punjab Pollution Control Board, Ludhiana
- b) Sh. J.P Meena, Scientist-D, Regional Directorate, Central Pollution Control Board, Chandigarh.
- c) Sh. Ravinder Garg, Superintending Engineer, Municipal Corporation, Ludhiana.

The officer of the Punjab Pollution Control Board apprised about the background of the case and stated that about 300 dyeing units are operating in the area of Ludhiana District, out of which about 252 units fall in the catchment area of Budha Nallah, which originates in village Koom Kalan of District Ludhiana and runs parallel to River Sutlej on its south till Budha Nallah joins River Sutlej at Village Walipur Kalan.

The officer of the Board further stated that for the treatment of wastewater of the dyeing industries, 03 Common Effluent Treatment Plants (CETPs) of total capacity 105 MLD have been installed at Ludhiana. The details regarding dyeing cluster, capacity of CETP, site of installation, technology and existing member units are given herein below:

S.No.	Dyeing Cluster of Ludhiana City	Capacity of CETP	Site of installation	Based on Technology	Existing Member Units	Disposal of treated wastewater
1	Bahadurke Road	15 MLD	Bahadurke Road	SBR	32	Budha Nallah
2	Tajpur Road	50 MLD	Tajpur Road	SBR	103	Budha Nallah
3	Focal Point	40 MLD	Tajpur Road	SBR	63	Budha Nallah
Total	03	105 MLD	03	-	198	

*G.S. Gill*  
P.P.C.B.

It is further brought out on record that apart from the above mentioned 198 dyeing units, about 54 dyeing units are such which could not join the

CETPs due to geographical reasons and scale of the industries. Out of these 54 dyeing units, 12 units are of large scale category, 16 units are of small category scattered at different places at 26 units are situated at Industrial Area-A. All these 54 dyeing units are having their own captive effluent treatment plants for the treatment of wastewater and discharge their treated wastewater into public sewer.

The officer of the Municipal Corporation, Ludhiana stated that after the installation and commissioning of CETPs for the wastewater treatment of dyeing industries, the domestic and industrial effluent of these industries stands segregated from the domestic sewerage of Ludhiana city. However the treated wastewater of 54 dyeing units which are having captive effluent treatment plants is being discharged and further treated in Sewage Treatment Plants installed by Municipal Corporation, Ludhiana for domestic sewage. One Sewage Treatment Plant of 225 MLD is being installed at Tajpur Road, Jamalpur Ludhiana and one additional STP of 60 MLD capacity is being installed at Balloke, Ludhiana. The detail of the existing and proposed Sewage Treatment Plants is given below:

#### Existing STPs

S.No.	Name of Sewage Treatment Plant (STP)	Capacity (MLD)	Based Technology	on	Disposal of treated wastewater
1	Balloke	105	SBR		Budha Nallah
2	Balloke	152	UASB		Budha Nallah
3	Bhattian	50	SBR		River Sutlej
4	Bhattian	111	UASB		River Sutlej
5	Jamalpur	48	UASB		Budha Nallah
Total	05	466	48 MLD STP is defunct, total operating capacity 418 MLD.		

#### Proposed STPs

S.No.	Name of Sewage Treatment Plant (STP)	Capacity (MLD)	Based Technology	on	Proposed Disposal of treated wastewater
1	Balloke	60	SBR		Budha Nallah
2	Jamalpur	225	SBR		Budha Nallah
Total	02	285			

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#### 4.0 Action taken by Punjab Pollution Control Board during last six months against the defaulter Dyeing industries located in Ludhiana

The officer of the Board brought out that the Punjab Pollution Control Board is regularly monitoring the working and operation of all type of industries including the dyeing industries situated in the area of Ludhiana from time to time. During the last 6 months, 29 dyeing units in the catchment area of Budha Nallah, which are not connected to any CETP have been visited. Out of the said 29 units, 12 units were found to be violating the environmental norms and accordingly show causes notices have been issued. 02 number industries were issued with directions for closure, Environmental Compensation is being imposed on 1 number industry and Bank Guarantee of Rs. 1.50 Lac has been imposed on another industry for causing pollution in the area. Bank Guarantee of Rs. 3.00 Lacs of one industry has been encashed by the Board. The remaining industries had minor violations and have been issued advisory.

#### 5.0 Compliance status of the working and operation of CETPs.

Three CETPs have been installed for treatment of wastewater of the dyeing clusters located at Bahadurke Road 15 MLD, Focal Point CETP 40 MLD and Tajpur Road 50 MLD. Total 198 member units are connected to these CETPs. All the CETPs are in operation and discharge their treated wastewater into Budda Nallah. An Evaluation Committee was constituted by the Ministry of Environment, Forest & Climate Change vide Office Order No. Q-15017-17-2017-CPW dated August 9, 2021 for post commissioning performance assessment of the two Common Effluent Treatment Plants (CETPs) viz. 50 MLD CETP by M/s Punjab Dyers Association (Tajpur Road Module), Ludhiana and 40 MLD CETP by M/s Punjab Dyers Association (Focal Point Module) Ludhiana, both partially funded by MoEF&CC. Whereas 15 MLD CETP located at Bahadurke Road, Ludhiana was jointly inspected by CPCB, RD, Chandigarh and PPCB officers on 26/07/2022 for compliance verification of the said CETPs. The samples collected from the CETPs were analyzed at the Head Office Laboratory of the CPCB at Delhi Laboratory. The details and overall compliance

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status of these CETPs are tabulated herein below:

Name of CETPs	Capacity utilization (MLD)	Date of Inspection	No. of member units of CETP	Commissioning of CETPs	Technology of CETPs	Status OP/Non OP	Status of compliance (as on date)	Final disposal of CETPs
CETP 40 MLD (Focal Point Module) Tajpur Road Ludhiana	30	04/08/22	33	January, 2022	SBR	OP	Non compliance	Budha Nallah
CETP 50 MLD (Tajpur Module) Ludhiana	48	04/08/22	110	31/03/22	SBR	OP	Non-compliance	Budha Nallah
CETP, 15 MLD, Bahadur Ke Road, Ludhiana	13	26/07/22	36	December, 2019	SBR	OP	Non-compliance	Budha Nallah

### 6.0 Action taken against the CETPs by the Board

The officer of the Board brought out that the Punjab Pollution Control Board is regularly monitoring the working and operation of all the CETPs at Ludhiana from time to time. After evaluating the performance of the Common Effluent Treatment Plants, it has been observed that all the CETPs were not meeting with the stringent environment norms in respect of BOD. It is pertinent to mention here that though the two CETPs of capacity 40 and 50 MLD are meeting with the environmental norms in respect of parameter BOD @ 30 mg/l as prescribed by MoEF, but are not complying with the stringent standard of BOD @ 10 mg/l as prescribed by the PPCB for the CETPs. The Punjab Pollution Control Board had sealed 50 % machinery of 65 dyeing units of 50 MLD CETP, out of total 103 dyeing units, to regulate the quantum of effluent to CETP. The Punjab Pollution Control Board has also directed CETP 50 MLD and CETP 40 MLD to achieve the prescribed stringent standard by 30.11.2022. The Punjab Pollution Control Board has taken

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several meetings with CETP 50 MLD and 40 MLD to explore the possibility for utilizing the treated effluent onto land for plantation and irrigation and directed the SPVs of these CETPs to submit feasibility report in this regard.

The third CETP of 15 MLD capacity at Bahadurke Road is not meeting with the standards prescribed by MoEF and Punjab Pollution Control Board. The Board has imposed Environmental Compensation of Rs. 77,62,500/- upon M/s Bahadurke Textile and Knitwear Association, 15 MLD CETP for violation of environmental norms and damage to environment for polluting the water of Budha Nallah and River Sutlej.

### 7.0 Overall Status of the STPs in Ludhiana

The officer of the Punjab Pollution Control Board brought out that the Punjab Pollution Control Board is regularly monitoring the working and operation of all the STPs at Ludhiana from time to time. All the Sewage Treatment Plants at Ludhiana were under the technical maintenance and re-habilitation by the Municipal Corporation, Ludhiana. Necessary action against Municipal Corporation, Ludhiana is under consideration of the Board.

### 8.0 Opportunity of hearing extended to the applicant Sh. Nitin Dhiman.

The Senior Environmental Engineer, Zonal Office-II, Ludhiana vide letter no. 6035 dated 28.9.2022 has extended an opportunity of personal hearing to the applicant Sh. Nitin Dhiman on 30.9.2022, keeping in view the order passed by the Hon'ble National Green Tribunal in O.A No. 225 of 2022. A copy of letter dated 28.09.2022 is enclosed as **Annexure-A**. The applicant Sh. Nitin Dhiman has submitted a letter dated 30.9.2022 addressed to the Chairman, Punjab Pollution Control Board, demanding some documents as mentioned in the letter. The points mentioned in the letter have been discussed in the report above and a copy of the letter dated 30.9.2022 is enclosed herewith as **Annexure-B**.

### 9.0 Observations of the Joint Committee.

The Joint Committee members have examined the entire case and also gone through the grievance of the applicant Sh. Nitin Dhiman. The grievances of the applicant were found to be not factually correct, in view of the facts and figures

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represented by the Board. The applicant has alleged that around 400 dyeing units are operating in Ludhiana city, consuming 3 crore liters of ground water for washing and dyeing daily and discharging approximately 300 MLD chemical mixed untreated water directly in Budha Nallah through municipal sewer. However, upon examination, it has been observed that about 300 dyeing units are operating in the area of Ludhiana District, out of which 252 units fall in catchment area of Budha Nallah. 198 Dyeing unit members have joined the three CETPs installed and commissioned in Ludhiana. The three CETPs are having the total capacity to treat the wastewater of 105 MLD. It is pertinent to mention here that against the total capacity to treat the wastewater of 105 MLD, the CETPs are receiving the total trade effluent of about 93-94 MLD. 54 dyeing units, which could not join the CETPs are having their own captive treatment plants and are discharging about 25 MLD of treated wastewater into municipal sewer which further leads to Budha Nallah. The details have already been given in paragraph 3.0 of the report above. It is pertinent to mention here that the remaining dyeing industries fall outside the catchment area of Budha Nallah and are discharging their treated effluent onto land for plantation or are having the arrangement of Zero Liquid Discharge.

The second grievance of the applicant has also been examined by the joint committee wherein it is alleged that MoEF&CC had issued the Environmental Clearance for setting up of one CETP on the basis of Zero Liquid Discharge (ZLD) technology but said CETP has been installed without ZLD technology. Upon examination of the grievance, it is observed that in the first instance, the Environmental Clearance for 117 MLD was issued by the Ministry of Environment and Forest to Punjab Dyers Association on 03.05.2013 and Environmental Clearance for 15 MLD CETP was issued by MoEF to M/s Bahadurke Textile and Knitwear Association Ltd. on 08.12.2014. The MoEF&CC has imposed a condition in the Environmental Clearance granted to M/s Bahadurke Textile and Knitwear Association Ltd. dated 08.12.2014 that the proponent shall maintain zero discharge. A copy of letter dated 08.12.2014 vide which Environmental Clearance was granted by the MoEF to M/s Bahadurke Textile and Knitwear Association Ltd. is enclosed herewith as **Annexure-C**. However, vide another letter dated 18.03.2016, the Government of India, Ministry of Environment, Forest and Climate Change while examining the new

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P.P.B.

proposal of CETP has recommended and approved the proposal of M/s Bahadurke Textile and Knitwear Association Ltd. to initiate the CETP based on conventional treatment system in Phase-1 with adoption of ZLD in Phase-2, for which the Association will apply to the MoEF&CC at a later stage as an up-gradation case. A copy of letter dated 18.03.2016 issued by the Government of India, Ministry of Environment, Forest and Climate Change to M/s Bahadurke Textile and Knitwear Association Ltd. is enclosed herewith as **Annexure-D**.

The joint committee further observed that the Punjab Pollution Control Board is regularly monitoring the working and operation of all type of industries including the dyeing industries, Common Effluent Treatment Plants, STPs from time to time and are taking appropriate action against the default. In this regard, details have already been recorded in paragraph 4.0, 5.0, 6.0 and 7.0 of the report above.

#### **10.0 Recommendations of the Joint Committee.**

The joint committee after going through the detail of the case, give the following recommendations:

**10.01 As per the term & condition of the approval of the proposal for 15 MLD CETP by MoEF&CC, M/s Bahadurke Textile and Knitwear Association Ltd. shall undertake implementation of the second phase of the proposal to achieve Zero Liquid Discharge and shall submit the complete proposal along with timelines for necessary approval from MoEF&CC within three months.**

**10.02 As the CETPs of capacity 40 MLD and 50 MLD have now been installed by M/s Punjab Dyers Association; as a next step, the SPVs shall explore the possibility for utilizing the treated effluent onto land for plantation and irrigation and submit the complete proposal alongwith timelines, within 03 months.**

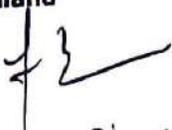
*Handwritten signature and initials:*  
G. S. G. W.  
P.P.C.B.

**10.03** The Department of Local Government, Punjab shall provide necessary facilitation to the Municipal Corporation, Ludhiana, so as to complete the installation of STP 225 MLD at Jamalpur and STP 60 MLD at Balloke alongwith rehabilitation of existing STPs as per the timelines.

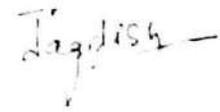
**10.04** Government of Punjab shall issue necessary directions to Water Resources Department and Department of Soil & Water Conservation to explore the possibility and submit the complete time bound plan within 06 months for utilizing the treated wastewater of STPs for the purpose of irrigation and plantation, so that there shall be zero liquid discharge in the Budha Nallah.

The joint committee hereby submits the report in compliance to order dated 26.04.2022 (O.A. no. 225 of 2022) for consideration and appropriate orders of the Hon'ble National Green Tribunal.

  
(Ravinder Garg)  
Superintending Engineer,  
Municipal Corporation,  
Ludhiana

  
Rajinder Singh  
SE, MCL, LDH

  
(G.S. Gill)  
Senior Environmental Engineer,  
Zonal Office, Ludhiana  
Punjab Pollution Control Board

  
(J.P. Meena)  
Scientist-D  
Regional Directorate,  
Central Pollution Control Board



ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਰੋਕਥਾਮ ਬੋਰਡ  
PUNJAB POLLUTION CONTROL BOARD

Zonal Office-II, E-648-B, Backside CICU Office, Phase-5, Focal Point, Ludhiana

E-Mail: seezo2ldhppcb@yahoo.com

Ph:- 0161-2670141

No. PPCB/SEE/ZO-2/LDH/2022/.....6035

Dated ....28/9/2022

To

Sh. Nitin Dhiman,  
R/o 1203, Princeton Tower, Omaxe,  
Pakhawal Road, Ludhiana.

Sub:- Hon'ble NGT Order dated 26.04.2022 in OA no 225 / 2022 In the matter of Nitin Dhiman Vs. State of Punjab.

In reference to above, It is intimated that Hon'ble NGT vide its order dated 26.04.2022 In OA no 225 / 2022 in the matter of Nitin Dhiman Vs. State of Punjab regarding discharge of chemical mixed untreated water directly in Buddha Nallah by dyeing industries in Ludhiana has directed to form a Joint Committee comprising of CPCB, State PCB and Municipal Corporation, Ludhiana.

The 2<sup>nd</sup> meeting of Joint Committee in this regard will be held on 30.09.2022 at 10.30 AM at Committee Room, Punjab Pollution Control Board, Phase-5, Focal Point, Ludhiana. You are requested to make it convenient to attend the above said meeting and to discuss the details regarding the above said matter.

Endst.....6036

Senior Environmental Engineer  
Dated...28/9/2022

A copy of above is forwarded to Chief Environmental Engineer, Punjab Pollution Control Board, Ludhiana for information please.

Endst.....6037-38

Senior Environmental Engineer  
Dated...28/9/2022

A copy of above is forwarded to the following for information and requested to attend the above said meeting, please.

1. Sh. J.P. Meena, Scientist (D), Central Pollution Control Board, Regional Directorate, Chandigarh.
2. Sh. Rajinder Singh, Superintending Engineer, Municipal Corporation Ludhiana.

Senior Environmental Engineer  
Dated...28/9/2022

Email: nitindhiman@pppcb.com  
Contact: 9815619019

Nitin Dhiman  
1203, Princeton Tower,  
Omaze, Ludhiana, 142022, Punjab.

30<sup>th</sup> September, 2022

Ref No: NGT/22/18

To  
The Chairman,  
Punjab Pollution Control Board,  
Vatavaran Bhawan, Nabha Road,  
Patiala

Subject: Hon'ble NGT order dated 26/04/2022 in OA number 225/2022, Nitin Dhiman v/s State of Punjab.  
Ref. PPCB/SEE/ZO-2/1.Dh/2022/6035 Dated 28/09/2022.

Dear Sir,

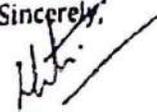
I heartily appreciate you for inviting me to the meeting held on 30<sup>th</sup> September, 2022 in regard to the order of Honorable NGT OA number 225/2022, Nitin Dhiman v/s State of Punjab.

In this regard I request you to provide me the following documents those are related to the environment of Ludhiana and specially the Buddha Nullah.

1. Analysis report of all the Three CETP's namely (i) PDA Tajpur Road, (ii) PDA Focal Point Module, (iii) Bahadurke Road Textile & Knitters cluster. The report shall include
  - a. Reports of sampling done by PPCB & any other agencies (Outsource) during last 1 year. Or from the date of commissioning of project. The sample report must include the remarks of the PPCB.
  - b. Quantum of water coming for treatment to these CETP's every month since last 1 year.
  - c. Mode of final discharge of treated water by these CETP's.
  - d. Installed capacity of these CETP's
2. The following information about these cluster proponents as to verify their actual record.
  - a) Consent of discharge of water given by PPCB to each member of Cluster (cluster wise)
  - b) Details of distribution of shares among member. (cluster wise)
  - c) Actual discharge by every member during last one year. (cluster wise)
3. The conditions of grant of aid to these 3 Clusters by MOEF and State.
4. Condition of Environment Clearances of these 3 CETP's in regard to discharge of treated water.
5. The copy submitted by the PPCB to the MOEF regarding final utilization certificate of grant.
6. Certificate by Commissioner of Municipal Corporation Ludhiana or other implementation agencies of local government regarding "Disconnection of sewage connections of dyeing units those are members of these 3 CETP's.
7. Is these three CETP's discharging treated water to Buddha Nullah, if yes than how much quantity of water discharged by these 3 CETP's to Buddha Nullah during last 1 year.

I ardently hope that my request would get your kind consideration.

Yours Sincerely,

  
Nitin Dhiman

C.C:

1. Secretary, Department of Sci. & Technology (GOP).
2. Chairman: PPCB Punjab.
3. Member Secretary: PPCB Punjab.
4. Chief Engineer: PPCB Ludhiana.

**F.No.10-119/2011-IA.III**  
**Government of India**  
**Ministry of Environment, Forests & Climate Change**  
**(IA-III Division)**

Indira Paryavaran Bhawan,  
 Jor Bagh Road,  
 New Delhi - 110 003

Dated: 8<sup>th</sup> December, 2014

**To**

**The Chairman,**

M/s Bahadur Ke Textile & Knitwear Association Ltd. (BTKAL),  
 C/o Jain Shawls, Bahadur Ke Road, Industrial Zone,  
 Ludhiana - 141 008, Punjab

**Subject: Establishment of Common Effluent Treatment Plant (CETP) of 15 MLD at Bahadurke Road Dyeing Complex, Ludhiana, Punjab by M/s Bahadur Ke Textile & Knitwear Association Ltd. (BTKAL) - Environmental Clearance reg.**

Sir,

This is with reference to your letter no Nil dated 18.07.2012 and subsequent letter dated 19.05.2014 for environmental clearance on the above-mentioned subject.

2. The Ministry of Environment, Forests & Climate Change has considered the application. It is noted that the proposal is for grant of Environmental Clearance for **Establishment of Common Effluent Treatment Plant (CETP) of 15 MLD at Bahadurke Road Dyeing Complex, Ludhiana, Punjab by M/s Bahadur Ke Textile & Knitwear Association Ltd. (BTKAL)**. The proposal was considered by the EAC in its meetings held on 16<sup>th</sup> -17<sup>th</sup> August, 2012 and 30<sup>th</sup> June, 2014 - 2<sup>nd</sup> July, 2014. The proponent has informed that:

- i. The project was accorded TOR vide letter no. F.No.10-119/2011-IA-III dated 12.03.2012.
- ii. The project involves establishment of Common Effluent Treatment Plant (CETP) of 15 MLD to collect, treat and dispose (to achieve zero discharge - through treat, recover and reuse options) process effluent from industrial units of Bahadurke Road Dyeing Complex engaged in textile dyeing, washing and printing processes at Bahadurke Road Industrial Area, Dyeing Complex, Ludhiana, Punjab.
- iii. It is proposed to establishment of CETP of 15 MLD alongwith biomass based captive co-generation power plant of 10 MW (2 \* 5 MW) as well as 60 MT/hour steam generation capacity.
- iv. The project location is within Bahadurke Road Dyeing Complex, Ludhiana, Punjab.
- v. Approximately 25 units (existing and proposed) have been identified as member units of the CETP.
- vi. The collected raw effluent will be treated through a sequence of unit operations including pre-treatment (screening, degritting, equalization), primary treatment (precipitation/coagulation, flocculation, and resulting



- sludge separation and dewatering - a hazardous waste), secondary treatment (anaerobic stabilization of organic matter present in the effluent, and separation and handling of secondary sludge), followed by tertiary treatment (through pressure depth multi-grade filters and activated carbon adsorption).
- vii. In order to achieve zero discharge, the effluent will be conditioned (through chlorination and dechlorination, followed by micron-filtration) and subjected to multi-stage membrane treatment (followed by three-stage reverse osmosis) wherein reject from each stage will be sequentially subjected to next stage of treatment.
  - viii. The permeate (purified accept) from each stage will be collected for reuse (to be supplied back to the participating industries through piped network). The concentrated reject from final RO stage will be subjected to destruction (through forced thermal evaporation) in Multiple Effect Evaporator (MEE).
  - ix. The fresh water requirement will be 5 KLD and will be met from ground source.
  - x. The affluent treatment sludge will be around 15.9 MT per day to be dried on site and disposed as hazardous waste through State's common TSDF facility.
  - xi. Boiler ash 15 MT per day to be disposed as soil conditioner (for agricultural activities) and landfill.
  - xii. The total land area is 15000 sq. mt.
  - xiii. The power requirement is 2500 KW and it is proposed to generate power about 10 MW using biomass.
  - xiv. The boiler capacity is 150 tones per hour. Maximum fuel requirement will be @ 15 MT/hour. The fuel handling system will be designed for a capacity of 20 TPH.
  - xv. ESP will be installed as air pollution control measure to the boiler.
  - xvi. Solid waste generated from the plant will be in form of boiler furnace ash (@ 60 MT/Day) which will be sold out to brick manufacturers, Biological treatment sludge (@ 9 MT/day) will be disposed through its use as soil conditioner for agricultural area in the vicinity.
  - xvii. Hazardous wastes will be generated in form of Primary treatment sludge (@ 15MT/Day), Solids from MEE concentrate drying and used oil will be handled and disposed as per HWM Rules, 2008.
  - xviii. The total project cost is Rs. 162 crores.
  - xix. **Wildlife issues:** There is no environmental sensitive location like wildlife sanctuary/national park within the 10 km radius of the airport.
  - xx. There is no court cases/violation pending with the project proponent.
  - xxi. **Public Hearing:** The Committee exempted the conduct of Public hearing since the site is located within the Industrial Estate.
  - xxii. The project is Category 'B' and since it is located in Ludhiana, a critically polluted area, it is treated as Category 'A' as per General Conditions of EIA, Notification, 2006.

3. The project was considered in the 115<sup>th</sup> EAC meeting held on 16<sup>th</sup> -17<sup>th</sup> August, 2012 and the Committee recommended the proposal for grant of Environmental Clearance, however advised the proponent to submit the MoU between CETP and member units indicating the maximum quantity of effluent to be sent to the CETP along with the quality and also the out let norms to be

complied by CETP. The Project Proponent submitted the MoU document on 02.06.2014 i.e. after approximately 2 years therefore the proposal was again referred to EAC for appraisal.

4. The proposal was reconsidered by the Expert Appraisal Committee (EAC) and recommended in its 135<sup>th</sup> EAC meeting held on 30<sup>th</sup> June, 2014 - 2<sup>nd</sup> July, 2014 for granting Environmental Clearance. The Ministry of Environment, Forests & Climate Change hereby accords Environmental Clearance for the above-mentioned **Establishment of Common Effluent Treatment Plant (CETP) of 15 MLD at Bahadurke Road Dyeing Complex, Ludhiana, Punjab by M/s Bahadur Ke Textile & Knitwear Association Ltd. (BTKAL)** under the provisions of the Environment Impact Assessment Notification, 2006 and amendments thereto and Circulars issued thereon and subject to the compliance of the following specific conditions, in addition to the general conditions mentioned below:

**A. SPECIFIC CONDITIONS:**

- (i) "Consent for Establishment" shall be obtained from State Pollution Control Board under Air (Prevention and Control of Pollution) Act, 1981 and Water (Prevention and Control of Pollution) Act, 1974.
- (ii) The Punjab Pollution Control Board shall conduct regular as surprise inspection of the CETP.
- (iii) Online monitoring of the influent and effluent shall be conducted.
- (iv) The proponent shall maintain Zero discharge.
- (v) The permeate (purified accept) from each stage shall be collected for reuse (to be supplied back to the participating industries through piped network). The concentrated reject from final RO stage shall be subjected to destruction (through forced thermal evaporation) in multiple effect evaporator (MEE).
- (vi) The MoU between CETP and member units shall indicate the maximum quantity of effluent to be sent to the CETP along with the quality.
- (vii) The MoU between CETP and FETP shall indicate the maximum quantity of treated effluent and also the out let norms to be complied by CETP.
- (viii) The effluent from member units shall be transported through CETP tankers only duly maintaining proper manifest system. The vehicles shall be fitted with proper GPS system.
- (ix) Before accepting any effluent from member units, the same shall be as permitted by the SPCB in the consent order. No effluent from any unit shall be accepted without consent from SPCB under the Water Act, 1974 as amended
- (x) Suitable meters shall be provided to measure the quantity of effluent received, quantity of effluent recycled/reused and discharged.



- (xi) ESP shall be installed as air pollution control measure with the boiler as proposed.
- (xii) Hazardous wastes will be generated in the form of Primary treatment sludge (@ 15MT/Day), Solids from MEE concentrate drying and used oil will be handled and disposed as per HWM Rules, 2008.
- (xiii) All the recommendation of the EMP shall be complied with letter and spirit. All the mitigation measures submitted in the EIA report shall be prepared in a matrix format and the compliance for each mitigation plan shall be submitted to Regional Office (RO), MoEF along with half yearly compliance report.
- (xiv) Transportation of Hazardous wastes shall be as per the section 129 to 137 of Central Motor Vehicle Rules, 1989.
- (xv) The proponent shall ensure that the project fulfills all the provisions of Solid Wastes (Management and Handling) Rules, 2000 including collection and transportation design etc.
- (xvi) The units and the CETP will maintain daily log book of the quantity and quality of discharge from the units, quantity of inflow into the CETP, details of the treatment at each stage of the CETP including the raw materials used, quantity of the treated water sent back to the units, quantity of the salts extracted from the treatment process and details of selling of such salts. All the above information shall be provided on-line of the web site exclusively prepared for the purpose by the CETP owner. The website should be accessible by the people. The financial and energy details of the CETP will also be provided along with details of the workers of the CETP.
- (xvii) The ground water at the site will also be monitored and information made available on the above web site.
- (xviii) The project proponent shall set up separate environmental management cell for effective implementation of the stipulated environmental safeguards under the supervision of a Senior Executive.

**B. General Conditions:**

- (i) Adequate provision for infrastructure facilities including water supply, fuel and sanitation must be ensured for construction workers during the construction phase of the project to avoid any damage to the environment.
- (ii) Appropriate measures must be taken while undertaking digging activities to avoid any likely degradation of water quality.
- (iii) The construction material shall be obtained only from approved quarries. In case new quarries are to be opened, specific approvals from the competent authority shall be obtained in this regard.

- (iv) Adequate precautions shall be taken during transportation of the construction material so that it does not affect the environment adversely.
- (v) Borrow pits and other scars created during the road construction shall be properly levelled and treated.
- (vi) Adequate financial provision must be made in the project to implement the aforesaid safeguards.
- (vii) The project proponent will set up separate environmental management cell for effective implementation of the stipulated environmental safeguards under the supervision of a Senior Executive.
- (viii) Full support shall be extended to the officers of this Ministry/ Regional Office at Chandigarh by the project proponent during inspection of the project for monitoring purposes by furnishing full details and action plan including action taken reports in respect of mitigation measures and other environmental protection activities.
- (ix) A six-Monthly monitoring report shall need to be submitted by the project proponents to the Regional Office of this Ministry at Chandigarh regarding the implementation of the stipulated conditions.
- (x) Ministry of Environment, Forests & Climate Change or any other competent authority may stipulate any additional conditions or modify the existing ones, if necessary in the interest of environment and the same shall be complied with.
- (xi) The Ministry reserves the right to add additional safeguard measures subsequently, if found necessary, and to take action including revoking of the environment clearance under the provisions of the Environmental (Protection) Act, 1986, to ensure effective implementation of the suggested safeguard measures in a time bound and satisfactory manner.
- (xii) In the event of a change in project profile or change in the implementation agency, a fresh clearance shall be obtained from the Ministry of Environment, Forests & Climate Change.
- (xiii) The project proponents shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of land development work.
- (xiv) A copy of the clearance letter will be marked to concerned Panchayat/local NGO, if any, from whom any suggestion/ representation has been made received while processing the proposal.
- (xv) Safety provision such as bus bays, service roads intersection improvement etc., will be carried out by the project proponent.



The project proponent shall provide adequate facilities as per IRC norms/guidelines.

(xvi) A copy of the environmental clearance letter shall also be displayed on the website of the concerned State Pollution Control Board. The EC letter shall also be displayed at the Regional Office, District Industries centre and Collector's Office/ Tehsildar's office for 30 days.

(xvii) The funds earmarked for environmental protection measures shall be kept in separate account and shall not be diverted for other purpose. Year-wise expenditure shall be reported to this Ministry and its concerned Regional Office.

5. These stipulations would be enforced among others under the provisions of water (Prevention and Control of Pollution) Act, 1974 the Air (Prevention and Control of Pollution) Act 1981, the Environment (Protection) Act, 1986, the Public Liability (Insurance) Act, 1991 and Municipal Solid Wastes (Management and Handling) Rules, 2000 including the amendments and rules made thereafter.

6. All other statutory clearances such as the approvals for storage of diesel from Chief Controller of Explosives, Fire Department, Civil Aviation Department, Forest Conservation Act, 1980 and Wildlife (Protection) Act, 1972 etc. shall be obtained, as applicable by project proponents from the respective competent authorities.

7. The project proponent should advertise in at least two local Newspapers widely circulated in the region, one of which shall be in the vernacular language informing that the project has been accorded Environmental Clearance and copies of clearance letters are available with the Punjab Pollution Control Board and may also be seen on the website of the Ministry of Environment, Forests & Climate Change at <http://www.cnvfor.nic.in>. The advertisement should be made within Seven days from the date of receipt of the Clearance letter and a copy of the same should be forwarded to the Regional office of this Ministry at Chandigarh.

8. This clearance is subject to final order of the Hon'ble Supreme Court of India in the matter of Goa Foundation Vs. Union of India in Writ Petition (Civil) No. 460 of 2004 as may be applicable to this project.

9. Any appeal against this clearance shall lie with the National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.

10. Status of compliance to the various stipulated environmental conditions and environmental safeguards will be uploaded by the project proponent in its website.

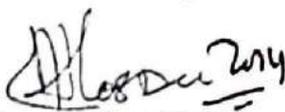
11. A copy of the clearance letter shall be sent by the proponent to concerned Panchayat, Zilla Parishad/Municipal Corporation, Urban Local Body and the Local NGO, if any, from whom suggestions/ representations, if any,

were received while processing the proposal. The clearance letter shall also be put on the website of the company by the proponent.

12. The proponent shall upload the status of compliance of the stipulated EC conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of MoEF, the respective Zonal Office of CPCB and the PPCB.

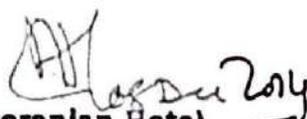
13. The project proponent shall also submit six monthly reports on the status of compliance of the stipulated EC conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF, the respective Zonal Office of CPCB and the PPCB.

14. The environmental statement for each financial year ending 31<sup>st</sup> March in Form-V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of EC conditions and shall also be sent to the respective Regional Offices of MoEF&CC by e-mail.

  
(Dr. Manoranjan Hota)  
Director

Copy to: -

1. The Secretary, Department of Environment, Government of Punjab, Chandigarh.
2. The Chairman, Central Pollution Control Board, Parivesh Bhawan, CBD-cum-Office Complex, East Arjun Nagar, Delhi - 110 032
3. The Member Secretary, Punjab Pollution Control Board, Vatavaran Bhavan, Nabha road, Patiala-147001, Punjab.
4. The CCF, Regional Office, Ministry of Environment, Forests & Climate Change (NZ), Bays No. 24-25, Sector-31-A, Dakshin Marg, Chandigarh-160030.
5. IA - Division, Monitoring Cell, MoEF, New Delhi - 110003.
6. Guard file

  
(Dr. Manoranjan Hota)  
Director

F. No. Q-15017/22/2014-CPW  
 Government of India  
 Ministry of Environment, Forest and Climate Change  
 (CP Division)



2<sup>nd</sup> Floor, Prithvi Wing  
 Indira Paryavaran Bhawan  
 Allganj, Jor Bagh Road  
 New Delhi-110 003  
 E-mail: h.kharkwal@nic.in  
 Telefax: 01124695384

Dated: 18<sup>th</sup> March, 2016

To,

The Member Secretary  
 Punjab State Pollution Control Board  
 Vatavaran Bhawan, Nabha Road,  
 Patiala - 147001  
 Punjab

Subject: Follow-up of the Minutes of the Appraisal Committee meeting on CETPs held on 03/03/2016- regarding.

Sir,

I am directed to enclose the Minutes of the Appraisal Committee Meeting on CETPs held on 03/03/2016 under the Chairmanship of Dr. Manoranjan Hota, Adviser (CP), MoEF&CC.

2. A copy of the minutes is enclosed. The Committee approved the following proposals:

i. 40 MLD CETP of M/s Punjab Dyers Association (PDA)-Focal Point Module Ludhiana, Punjab.

ii. 15 MLD CETP by M/s Bahadur Ke Textile & Knitwear Association (BKTKA) at Bahadur Ke Road, Ludhiana, Punjab.

3. The State Pollution Control Board may indicate the status of release of State subsidy to above said CETPs, so as to enable us to take further necessary action for processing the release of Central share as per the CETP Guidelines.

This may be treated as most urgent.

Encl. as above.

Yours faithfully,

Sd/-

(Dr. H. Kharkwal)  
 Joint Director (S)

Copy to:

The Chairman/Managing Director  
 M/s Bahadur Ke Textile &  
 Knitwear Association (BKTKA),  
 C/o Jain Shawls, Bahdur Ke Road,  
 Industrial Zone, Ludhiana- 141008, Punjab.

**Minutes of the Appraisal Committee meeting on Common Effluent Treatment Plants (CETPs) held in the Ministry of Environment, Forest & Climate Change on 03/03/2016.**

A meeting of the Appraisal Committee on Common Effluent Treatment Plants was held in the Ministry of Environment, Forest and Climate Change at New Delhi on 03/03/2016 under the Chairmanship of Dr. Manoranjan Hota, Adviser (CP). The list of participants is annexed. At the outset the Chairman of the Committee welcomed the Members of the Committee attended the meeting and gave a brief background of the revised guidelines for central assistance to CETPs, procedures etc. invited the proponents to make presentation of their CETP proposals.

2. Joint Director (HK), MoEF&CC informed that the Appraisal Committee meeting was convened to discuss two new proposals of CETPs submitted as per revised guidelines on CETPs which has been duly recommended and forwarded by the Punjab State Pollution Control Board.

3. The following new proposals of CETP were presented and discussed in the meeting:

**3.1 40 MLD CETP of M/s Punjab Dyers Association (PDA)-Focal Point Module Ludhiana, Punjab**

- i. The proposal was duly recommended and forwarded by Punjab State Pollution Control Board (PPCB) for financial assistance for 40 MLD CETP of the SPV, M/s Punjab Dyers Association (PDA) - Focal Point Module, Ludhiana, Punjab. The CETP is based on Physico-Chemical followed by Advanced Biological treatment systems which is further followed by disinfection systems. The treated effluent will be discharged at the outfall of Ludhiana Sewage Treatment Plant (STP) and will be utilized for irrigation of agricultural land.
- ii. The presentation on the project was made by Shri John Thomas, Consultant/ Environmental Advisor to PDA- Focal Point Module.
- iii. There are currently 55 industries who are members of the 40 MLD PDA Focal Point CETP.
- iv. Ludhiana has been identified as one of the Critical Polluted Areas and has also been recently been selected for the first 20 Smart Cities to be developed in the country. The Member Secretary, Punjab Pollution Control Board (PPCB) also clarified that the environmental standards were set for the said CETP after detailed deliberations with experts from CPCB, Punjab Agricultural University, PPCB. Apart from the Real Time Effluent Monitoring Systems; PPCB will be also regularly monitor the CETP performance.

- v. The Project DPR has been technically appraised by Guru Nanak Engineering College, Ludhiana and IIT Madras, Chennai; as well as been assessed for Techno-Economic Viability by Punjab National Bank.
- vi. The proponent has mentioned that the treated effluent shall be discharged and utilized for irrigation purpose. Member Secretary, PPCB also confirmed that Government of Punjab has approved the project for providing conveyance system for carrying treated effluents from the STPs and CETPs in Ludhiana for irrigation and also stated that they have stipulated a condition in the Consent To Establish as the farmers shall be made aware that the water supplied to them is treated effluent.
- vii. The Member Secretary, PPCB has informed that a Special Purpose Vehicle (SPV) will be constituted for the CETP with the Director of Industries, Government of Punjab who will be by default be part of the Managing Board of the SPV apart from other State Government nominees.
- viii. The Member Secretary, PPCB has stated that the basic construction activities of the CETP of the Punjab Dyers Association, Ludhiana has been taken up by the project proponent to demonstrate PDA-Focal Point Module's commitment to the project and does not have much bearing on assistance component on the overall scale and cost of the project.
- ix. The Overall cost of the 40 MLD CETP and laboratory is ₹55.40 crores as per the following details:

<b>CETP &amp; Laboratory</b>	
Civil works	₹24.93 crores
Electro-Mechanical Components	₹27.70 crores
Design & Drawing	₹2.77 crores
<b>Sub Total</b>	<b>₹55.40 crores</b>

- x. The Source of Funding for the project as indicated by the Project Proponent are as per the following details:

<b>CETP &amp; Laboratory</b>	
Central Assistance	₹15.00 crores
State Govt. Assistance	₹7.50 crores
PDA's own funds	₹7.50 crores
Additional funding to be sourced by PDA from Financial institutions	₹25.40 crores
<b>Sub Total</b>	<b>₹55.40 crores</b>

- xi. The Proponent indicated that Punjab National Bank (PNB) has appraised the financial viability of the project and has indicated its in-principle

willingness to finance upto an amount of ₹49.55 crores to cover the project and associated costs.

- xii. The proponent informed that the current 22 km long conveyance system is based on gravity with the CETP at a lower level. The logistics, infrastructure costs - CAPEX and OPEX do not support economic viability of recycle / reuse of treated effluent within industries under current circumstances. The same would cause further environmental burden linked to high energy consumption towards pumping, evaporation etc.
- xiii. The project has an Environment and Sludge Management Plan and has confirmed that it is Member of the Common Hazardous Waste TSDF at Nimbua, Derabassi and has an agreement already signed up for disposal of sludge into this facility.
- xiv. The proponent has confirmed that a legal agreement has been made between the SPV and its 55 Members regarding their roles, responsibilities and the sharing of the capital and O&M costs; as specified under the CSS guidelines.
- xv. The project would be completed in 18 months.
- xvi. As per the revised Central Sector Schemes guidelines for CETPs involving primary, secondary and tertiary treatment; financial assistance would be provided by GoI to the tune of 50% of maximum project cost or ₹1.5 crore/MLD capacity, subject to a ceiling of ₹15 crores per CETP. Considering the project is eligible for Central subsidy, the Committee approved Central subsidy of ₹15 crores for the project.

**3.2** After a detailed deliberations, the Committee recommend/approved the 40 MLD /CETP of M/s Punjab Dyers Association, Ludhiana, Punjab.

**4. 15 MLD CETP by M/s Bahadur Ke Textile & Knitwear Association (BKTKA) at Bahadur Ke Road, Ludhiana, Punjab.**

- i) The proponent has informed that there are currently 23 industries, which are Members of the CETP Association.
- ii) A presentation of the proposal was made by Sh. Pardeep Kumar of M/s JBR Technologies Pvt. Ltd., Ludhiana and the consultant of the BKTKA.
- iii) Earlier, the proposal of CETP was based on Zero Liquid Discharge (ZLD) Technology was duly recommended and forwarded by Punjab Pollution Control Board (PPCB) for financial assistance for 15 MLD CETP. But due to reluctance of Bankers for the disbursement of finance for ZLD, the proposal was reformulated/ recommended for financial assistance which is based on

aerobic biological system for tertiary treatment in the Phase-I. The ZLD will be considered in Phase-II.

- iv) The project proponent has indicated their intention to initiate the CETP based on conventional treatment system in Phase-I. They may adopt ZLD in the Phase-II for which they will apply to the MoEF&CC at a later stage as an up-gradation case.
- v) The Association informed that a dedicated piped conveyance system will be laid to carry the effluent from 23 units to the CETP and this conveyance system has been approved by the Municipal Corporation, Ludhiana.
- vi) The Association also informed that the sludge generated from the CETP be transported to the Common Hazardous Waste Treatment and Disposal Facility, Nimbua, Dera Bassi, Punjab, which is a scientifically designed disposal site duly approved by the Govt. of Punjab. The Association has obtained the Membership of the facility.
- vii) The financial appraisal for the CETP which is based on aerobic biological system has been done by the Bank of Baroda, MID Corporate Branch, Ludhiana.
- viii) Member Secretary, Punjab State Pollution Control Board has confirmed that the Consent to Establish (CTE) has been issued by PPCB based on the ZLD.
- ix) The proponent in response to the query regarding adoption of an Ion Exchange in tertiary phase of non-ZLD based CETP, stated that Ion Exchange would help in increasing the life of RO membranes when ZLD will be adopted in Phase-II.
- x) The proponent informed the Committee that they have already got commitment from the State Government for assistance to the tune of ₹10 crores and requested GOI to provide financial assistance and permission to initiate a non-ZLD based CETP in Phase-I and then upgrade to ZLD based CETP subject to support from the financial institutions. However, the Committee recommended that the Association should submit a fresh proposal for Zero Liquid Discharge at a later stage so that the CETP is installed in a phased manner. The CETP shall treat the effluents to meet the norms prescribed for CETP.
- xi) The total project cost of the 15 MLD CETP is ₹51.11 crores as per the following:

Sr. No.	Item	Total Cost (₹in Crores)
1	Land	Leased
2	Land development cost (already incurred)	₹1.25
3	Building & Civil works	₹28.76

4	Water pipeline cost	229	₹2.25
5	Road Repair (Lumpsum)		₹0.15
6	Mechanical & Electrical		₹12.69
7	Interest during construction period		₹1.98
8	Misc. fixed assets (Lumpsum)		₹0.25
9	Electricity security (1400 KW @ ₹2000 /KW)		₹0.28
10	Preliminary & Pre-operative expenditure		₹1.00
11	Working capital margin		₹1.25
12	Contingency		₹1.22
<b>TOTAL</b>			<b>₹51.11</b>

- xii) The source of funding for the project as indicated by the proponent are as follows:

1	MOEF&CC subsidy (50%)	₹15.00 crores
2	State Govt. Subsidy (25%)	₹ 7.50 crores
3	Members contribution (25%)	₹ 7.50 crores
4	Members contribution by way of loan from bank	₹21.11 crores
<b>TOTAL</b>		<b>₹51.11 crores</b>

The Association has already taken the approval from the Bank of Baroda, a Nationalized Bank, for a loan of ₹37.35 crores out of which an amount of ₹21.11 crores will be available by the proponent.

- xiii) With regard to the high cost of the CETP project, the proponent clarified that the CETP is to be constructed in vertical horizon with lot of civil work depending upon the soil bearing capacity of the area. The Techno Economic Viability (TEV) study has included all the aspects before giving financial approval to the project. The total cost of Plant & Machinery of CETP is ₹41.75 crores and the cost of sewerage line & disposal line & other misc. is ₹9.36 crores. The proponent however clarified that the Committee may approve the funds as per the CETP guidelines. The SPCB also supported their proposition and also stated the State Board has committed for the State share of ₹10 crores as per the CETP guidelines.
- xiv) As per the revised Central Sector Schemes guidelines for CETPs involving primary/ secondary/ tertiary treatment; financial assistance would be provided by GoI to the tune of 50% of maximum cost of the project or ₹1.5 crore/MLD capacity, or subject to a ceiling of ₹15 crores per CETP maximum. Considering the project is of 15 MLD capacity, the Committee approved for Central subsidy of ₹11.25 crores for the project.
- xv) The Govt. of Punjab has already given a commitment letter vide letter Memo No.10/87/2015 (STE-5) in October, 2015 for ₹10.00 crores as State share of the project.

xvi) The project would be completed in 18 months.

4.1 After a detailed deliberation, the Committee has recommended/approved the CETP proposal of M/s Bahadur Ke Textile & Knitwear Association at Bahadur Ke Road, Ludhiana, Punjab.

The meeting ended with a Vote of Thanks to the Chair.

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## Annexure

List of the Participants who attended the meeting of the Appraisal Committee Meeting of Common Effluent Treatment Plants (CETPs) held on 03/03/2016 in Indra Paryavaran Bhawan, Jor Bagh Road, New Delhi.

S. No.	Name & Address	Designation
1.	Dr. Manoranjan Hota, Adviser, Ministry of Environment, Forest & Climate Change, New Delhi	Chairman
2.	Dr. Neelam, Scientist 'E' of Ministry of Science & Technology, New Delhi	Member
3.	Sheri Ankush Tewari (EE) of Central Pollution Control Board, Delhi.	Member
4.	Ms. Pratima Gupta, Director, Niti Ayog, New Delhi	Member
5.	Dr. Babu Ram, Member Secretary, Punjab Pollution Control Board (SPCB), Punjab	Member
6.	Sheri Abhijit Roy, Under Secretary, IFD, MoEF&CC, New Delhi	Member
7.	Dr. H. Kharkwal, Joint Director/Scientist 'D', C.P. Division, MoEF&CC, New Delhi	Member Secretary
8.	Sheri Prithipal Bhalla, Punjab Dyers Association Ludhiana, Punjab.	Proponent
9.	Shri Vijay Mehtani, Vice President.....Dyers Association Focal Point Module Ludhiana, Punjab.	Proponent
10.	Shri Ajit Maruthe, Technical Adviser, Punjab Dyers Association, Ludhiana, Punjab.	Proponent
11.	Shri John Thomas, Consultant, Punjab Dyers Association Ludhiana, Punjab.	Proponent
12.	Prof. Vivek Dhawan, Punjab Dyers Association, Ludhiana, Punjab.	Proponent
13.	Sheri Er. Harbir Singh, SEE, Punjab, Pollution Control Board, Zonal Officer, Ludhiana, Punjab.	Proponent
14.	Shri Vishal Jain, Director, Amar Ind. Ltd. Ludhiana, Punjab.	Proponent
15.	Sheri Pradeep Singh, Technical Director, JBR Technologies Pvt. Ltd. Ludhiana, Punjab.	Proponent
16.	Shri Lalit Jain, MD, Bahadur Ke Knit wears & Textiles Association, Ludhiana, Punjab.	Proponent
17.	Sheri Rajveer Gupta, Director, Bahadur Ke Knit wears & Textiles Association, Ludhiana, Punjab.	Proponent
18.	Sheri Arun Jain, Director, Jain Shawals, Ludhiana, Punjab.	Proponent

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ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਕੰਟਰੋਲ ਬੋਰਡ  
PUNJAB POLLUTION CONTROL BOARD

Zonal Office-II, E-648-B, Backside CICU Office, Phase-5, Focal Point, Ludhiana

Ph-0161-2670141

E-MAIL seezoldh2.ppcb@punjab.gov.in

No. PPCB/SEE/ZO-2/LDH/2022/.....

Dated .....

To

- 1) The Chairman,  
Bahadurke Textile Knitwear Association,  
C/o M/s Adinath Dyeing & Finishing Mills,  
Bahadurke Road, Industrial Zone, Ludhiana.
- 2) The Director,  
Bahadurke Textile Knitwear Association,  
C/o M/s Shri Balaji Finishing Mills,  
Bahadurke Road, Dyeing Complex, Ludhiana.

Sub: Establishment of Common Effluent Treatment Plant (CETP) of 15 MLD at Bahadurke Road Dyeing Complex, Ludhiana, Punjab by M/s Bahadur Ke Textile & Knitwear Association Ltd. (BTKAL) Environmental Clearance reg.

Ref:- MoEF&CC No.10-119/2011-IA.III dated 08.12.2014.

In reference to above, it is intimated that the CETP of capacity 15 MLD was granted Environmental Clearance vide above referred letter with specific condition that the proponent shall maintain Zero discharge.

Thereafter, a follow-up meeting of the Appraisal Committee on CETPs held on 03/03/2016 and minutes were conveyed vide MoEF&CC letter no. Q-15017/22/2014-CPW dated 18.03.2016, wherein it was decided that the proposal of CETP from BTKKA to initiate the CETP on conventional treatment system in Phase-I and may adopt ZLD in the Phase-II for which they will apply to the MoEF&CC at a later stage as an up-gradation case.

The CETP was commissioned on July, 2020. Accordingly, the CETP was granted temporary consent to operate under Water (Prevention & Control of Pollution) Act, 1974 for discharge of treated effluent into Budha Nallah in the 1<sup>st</sup> Phase. The CETP is also not achieving the prescribed standards for the discharge of effluent into Budha Nallah.

It is, therefore, directed that:-

1. The SPV shall take all the corrective measure and shall ensure to achieve the prescribed standards immediately.
2. The SPV shall adopt Phase-II of the CETP and to submit the proposal of ZLD to MoEF&CC within one month under intimation to this office.

Senior Environmental Engineer  
For Member Secretary of the Board

Dated. 02/12/2022

Endst. No. 7329

A copy of the above is forwarded to the following for information:-

1. The Member Secretary, Punjab Pollution Control Board, Head Office, Patiala.
2. The Chief Environmental Engineer, Punjab Pollution Control Board, Ludhiana.
3. The Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana.

Senior Environmental Engineer  
For Member Secretary of the Board