BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PB AT NEW DELHI

EXECUTION APPLICATION NO 46/2025

IN

O.A. NO. 1325 OF 2024

IN THE MATTER OF:

Public Action Committee & Ors ...APPLICANT

VERSUS

Union of India & ors ...RESPONDENTS

INDEX

Filed by

I K Kapila
Advocate for Respondent No 4,
Punjab Dyers Association, Tajpur Road, Ludhiana
CG D 082, DLF Capital Greens
New Delhi -110015
kapilaik@yahoo.co.in
9582063272

32

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PB AT NEW DELHI

EXECUTION APPLICATION NO 46/2025

IN

O.A. NO. 1325 OF 2024

IN THE MATTER OF:

Public Action Committee & Ors ...APPLICANT

VERSUS

Union of India & ors ...RESPONDENTS

REPLY OF RESPONDENT NO.4, PUNJAB DYERS ASSOCIATION, TAJPUR ROAD (50 MLD CETP)

MOST RESPECTFULLY SHOWETH:

The applicant filed OA no 1325/ 2024 praying for execution of directions of Respondent No 3 in the OA, Punjab _Pollution Control Board dated 25.9.2024 passed under sec 33A of Water Act 1974 and also praying for imposition of environmental compensation upon the answering respondent mainly for discharging treated effluent from 50 MLD CETP in to Buddha Nala, Ludhiana in violation of condition imposed in the Environmental Clearance by Respondent No 1 in the OA, MoEFCC, Govt of India and for prosecution proceedings against the answering Respondent.

The Reply of the said OA 1325/2024 has already been filed by the Punjab Dyers Association as R-4 in the said OA. It is placed at running page no **186-220** of the case.

That subsequently the Applicant has filed present EA no 46/2025 to reiterate its prayers in OA 1325/2024 and further seeks to set aside MoM of the meeting chaired by Joint Secretary, MoEFCC on 5.12.2025. The MoM of said meeting are placed at running page no **517-554.**

PARAWISE REPLY

1. Para 1 & 2 : It is denied that discharge from polluted effluents in to Buddha Dariya (nala) has caused grave and irreversible health hazard to residents of Ludhiana and numerous down stream villages before the water meets river Satluj, particularly due to discharge of 50 mld CETP in to Buddha Nala with permission of PPCB for which the PPCB is authorised by general condition no 4 of EC dated 3.5.2013 itself. It may be submitted here that 50 mld CETP was constructed after sanction of the project by MoEFCC in Nov 2019 after which fresh CTE was obtained from PPCB who permitted discharge of treated effluent in to Buddha Nala. The MoEFCC had already amended EIA notification in Dec 2018 vide which no EC was required for setting up the 50 mld CETP. No evidence has been placed on record by the applicant in support of his allegations. The table showing results of various sample test result are enclosed as **Annexure -1** for kind perusal. It is submitted that the CETP effluent does fail to meet standard for parameter of TDS since the CETP is not designed to remove TDS. The TDS in final effluent would be able to meet prescribed standard after the PPCB notifies and enforces CETP inlet and industry level PETP discharge standards in compliance of MoEFCC notification dated 1.1.2016 and CPCB directions under Sec 18 of Water Act 1974. A copy of draft CETP inlet standards proposed by PPCB and objections/ suggestions submitted to PPCB in response to draft standards are enclosed as **Annexure 2 colly.**

2. Para 3 &5 : it is denied that the answering respondent are wilfully discharging any violation of mandatory EC condition and disobeyed orders of this Hon'ble Tribunal. Photograph at internal page no. 18 is taken near discharge point of the outlet of 50 mld CETP in to Buddha Nala. All other photographs at PC 10 and PC 11 do not show the position / structure belonging to 50 mld CETP. A video showing 50 mld CETP and CETP out let at Buddha Nala showing actual position shown during the hearing before Joint Secretary, MoEFCC on 5.12.2025. Screen shots from said video are enclosed as **Annexure 3 Colly.** It is further submitted that most of the member units of 50 mld CETP are engaged in job work. The effluent load on CETP thus depends on it. The average quantity of effluent treated in CETP during 2025 is about 45 mld.

34

3. Para 4: does not pertain to answering respondent. Hence need no reply.

4. Para 6 & 7: it is denied that PPCB has issued the 50 mld CETP the consent to establish with condition "no discharge in Buddha Nala". In fact, after sanction of project by MoEFCC in Nov 2019, PPCB issue fresh Consent to Establish with temporary permission to discharge treated effluent from 50 mld CETP in to Buddha Nala. A copy of the CTE dated 16.11.2021 is already placed at Running **Page 197-199 (relevant page 198- mode of disposal)** of reply of answering respondent to OA no 1325. As already submitted the CETP is functioning satisfactorily and it is believed that after notification and enforcement of CETP inlet and industry level PETP standards, the CETP would be able to meet all prescribed parameters notified by MoEFCC vide notification dated 1.1.2016.

5. Para 8, 9 & 10 : The averments made in the para do not specifically relate to answering respondent. Hence need no reply. How ever, the answering respondent craves the leave of Hon'ble Tribunal to submit response to the MoM separately as here under:

Response of the Answering Respondent to Minutes of Meeting dated 5.12.2025, convened by Joint Secretary, MoEFCC

(i) The Minutes note the submission of the respondent at para 2 (line 4) under heading **Submission by M/S Punjab Dyers Association (Running page 535 of OA 1325/2024)** as under :

... " the current discharge is legally backed by PPCB consents and the modification authority permissible under General conditions." ...

In this regard it is submitted that General condition (iv) of the EC dated 3.5.2013 reads as under :

"(iv) Ministry of Environment & Forest 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."

The reasons furnished by PPCB for permitting discharge of treated effluent in to Buddha Nala are recorded at (c) in last para on running page 538 continuing on running page 539-540.

(ii) The MoEFCC has concluded the inferences at para 10 at running page 551-552 of the OA. The answering respondent expects that results of fresh sampling by CPCB & PPCB will bring out true factors responsible for pollution of Buddha Nala from all sources including sources discharging polluted effluent in to buddha nala unauthorisedly.

6. The answering respondent has already filed appeal no 40/2024 against directions issued by PPCB for stopping discharge of treated effluent from 50 mld CETP in to Buddha Nala and Appeal no 18/ 2025 and Appeal No 40/2026 respectively for Environmental compensation/ damages imposed upon the Respondent for alleged violations by the Respondent.

7. The Respondent respectfully submits that neither the Parliament has empowered nor intended to empower Pollution Control Boards to impose EC nor the State/ Central Govt has notified any Rules / regulations under Water Act 1974 enabling Pollution Control Boards to assess the environmental damages objectively after observing rules of natural justice. Intent of Parliament is further confirmed from bare reading of amended Sec 45 B (3) of Water Act vide notification dated 15 Feb 2024. Even, the guidelines prepared by CPCB are neither objective nor they are prepared after observing rules of natural justice.

Respondent No 4

Punjab Dyers Association, Tajpur Road, Ludhiana

Dated 15.4.2026

Filed Through

I K Kapila
Advocate for Respondent Punjab Dyers Association
CG D 082, DLF Capital Greens
New Delhi -110015
kapilaik@yahoo.co.in
9582063272

36

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PB AT NEW DELHI

IN
EA No 46/2026
IN
O.A. NO. 1325 OF 2024

IN THE MATTER OF:

Public Action Committee & Ors ...APPLICANT

VERSUS

Union of India & ors ...RESPONDENTS

AFFIDAVIT

I, Vivek Kumar Jindal, a Director of Punjab Dyers Association at present at Ludhiana , do hereby solemnly affirm and declare as under: -

1. That I am presently a director of Punjab Dyers Association, a Company registered under company Act having Registered office at Kaka Road, Opp. Central Jail, Tajpur Road LUDHIANA PUNJAB, and duly authorized by the Company to file this affidavit.
2. That I am fully conversant with case as derived from office record and competent to swear to this affidavit.
3. That I have read the accompanying reply 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.
4. That the Annexures are true copy of the originals.

NOTARY PUBLIC Ms. Vijay Sharma Ludhiana (Pb.) Reg. No. 53386 1405 GOVT. OF INDIA

Certified that the affidavit/S.P.A./G.P.A. has been read over & explained to the deponent executant who seemed correctly to understand the same at the time of making above thereof

14 APR 2026

Vivek Kumar Jindal.
DEPONENT

VERIFICATION:

Verified at Ludhiana on this day of April 2026, 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.

1405
14/4/26

Vivek Kumar Jindal.
DEPONENT

ATTESTED
NOTARY PUBLIC,
Ludhiana Punjab, India.

PUNJAB DYERS ASSOCIATION

Sr. no.	Parameters	Shri Ram Institute For Industrial Research (Shri Ram Lab)		Sophisticated Industrial Materials Analytic Labs Pvt.Ltd. (Sima Lab)		Punjab Biotechnology Incubator (PBTI)		Department of Civil Engineering (IIT Roorkee)		Sophisticated Analytical Instruments Laboratories (SAI Lab Thapar)		Central Pollution Control Board (CPCB)		Punjab Biotechnology Incubator (PBTI)		Punjab Biotechnology Incubator (PBTI)		Punjab Biotechnology Incubator (PBTI)		The State Board Analyst		Prescribed limits (All Values are in mg/l) Prescribed by MOEF & CC vide notification, dated 1/1/2016 for
		13.11.2024		13.11.2024		18.11.2024		19.11.2024		24.12.2024		24.12.2024		03.06.2025		21.07.2025		18.08.2025		11.09.25		
		Inlet	Oulet	Inlet	Oulet	Inlet	Oulet	Inlet	Oulet	Inlet	Oulet	Inlet	Oulet	Inlet	Oulet	Inlet	Oulet	Inlet	Oulet	Inlet	Oulet	
1	pH	8.2	8.1	7.28	7.39	7.71	7.33	7.55	7.43	7.6	8.1	7.5	8	7.26	8.42	8.23	8.46	7.88	7.55	7.7	7.5	6 to 9
2	TSS	300	60	278	20	143	43	135	30	112	32	192	47	415	87	107	27	158	53.5	118	43	100
3	Colour	40	100	984	86	434	125							962	131	376	180	674	205	100	50	
4	BOD	434	38	375	11	224	27	225	27	253	16	194	54	145	8	183	5.3	305	16	108	23	30
5	COD	864	184	1024	120	575	193	879	110	840	68	570	125	680	125	515	73	625	118	649	170	250
6	TDS	2688	2276	2649	2040	1764	2772	1990	1766	2680	1488	2680	2852	3249	2886	1927	2619	2008	2423	2820	2483	2100
7	Oil & Grease	20	2	10.8	<3	6.3	2.8			48.7	<5.0	BDL	BDL	3.9	1.6	2.1	BDL	2.1	BDL	15.8	6.2	10
8	Total chromium	0.04	0.04			0.01	BDL			<0.3	<0.30	BDL	0.005	BDL	BDL			BDL	BDL	BDL	BDL	0.2
9	Ammoniacal Nitrogen	2.8	2			6.4	BDL	16.1	5.8	0.68	<0.05	BDL	0.43	15.7	BDL	BDL	BDL	BDL	1.4	7	1.2	50
10	Phenolic compound	1	BDL			BDL	BDL					1.6	3.62	BDL	BDL	BDL	BDL	BDL	BDL	3	BDL	1
11	Sulphate									168	133	280	410									1000
12	Sulphide	3.2	0.4			BDL	BDL			1.3	<1.0	3.2	2.4	BDL	BDL	BDL	BDL	BDL	BDL	2.8	BDL	2
13	Fixed Dissolved Solids	2688	2276									2279	2364									2100
14	Fluoride									0.33	0.38	BDL	0.8									2
15	Copper									<0.05	<0.05	0.029	BDL									0.05
16	Nickel									<0.20	<0.20	0.006	0.007									0.3
17	Cadmium									<0.10	<0.10	BDL	BDL									0.3
18	Zinc									0.3	0.34	0.223	0.045									0.5
19	Lead									<0.05	<0.05	BDL	BDL									0.1
20	Selenium											BDL	BDL									0.05
21	Chloride	1018	1018							927	489	1093	1283									1000
22	Residual Sodium Carbonate					0	0							0	0	0	0	0	0			
23	Sodium Absorption Ratio	15.5	15.1			8.7	23.9							24.1	22.9	10.9	20.5	8.1	14.9	28.9	25.1	26
24	Nitrate							15.2	4.4	5.61	16.7	12.2	4.8									10
25	Total phosphorous							3.4	1.8	2.58	<0.20											5
26	Manganese									0.1	<0.10	0.112	0.039									0.2
27	TKN									1.02	0.75	0.4	BDL									50
28	Feacal Coliform													3.5x100000	1.3x10000							
29	MLSS					2965								4570		9808				2080		
30	Bio-Assay		90%				100%								90%		100%		90%	100%		

Annexure 2 colly

PUNJAB POLLUTION CONTROL BOARD
NABHA ROAD, PATIALA

No. 369
Dated 22/8/25

Subject: **Laying down of Inlet Quality Standards for Common Effluent Treatment Plant (CETP) and Primary Effluent Treatment Plant standards for member units of dyeing cluster 50 MLD CETP at Tajpur Road, Ludhiana –** Invitation of objections and suggestions from the stakeholders and general public.

DRAFT ORDER

The Government of India, Ministry of Environment, Forest & Climate Change (MoEF&CC) vide notification no. S.O 4(E) dated 01.01.2016, has notified the treated effluent quality standards for Common Effluent Treatment Plants (CETPs)and mandated that for each CETP, the State Pollution Control Board (SPCB) will prescribe inlet quality standards;

and whereas, the Central Pollution Control Board (CPCB) vide letter dated 22.06.2017 had issued certain directions to all SPCBs/PCCs u/s 18(1)(b) of the Water (Prevention and Control of Pollution) Act, 1974 including the direction to prescribe the Inlet Quality Standards for compliance by member units of all the CETPs in the State as per MoEF&CC notification dated 01.01.2016 and to upload the prescribed inlet quality standards on SPCB/PCCs website under intimation to CPCB;

and whereas, the Monitoring Committee constituted by the Hon'ble National Green Tribunal (NGT) in the matter of O.A. no. 101/14 titled Sobha Singh and Others Vs State of Punjab and Others in a meeting held on 04.12.2018 desired Punjab Pollution Control Board to prescribe PETP standards for all CETPs in Punjab;

and whereas, the Hon'ble NGT vide order dated 28.2.2019 passed in O.A No. 916 of 2018 (earlier O.A no. 101 of 2014) desired that the Committee may ensure that standards of PETP outlets connected to CETPs are notified at the earliest;

whereas, MoEF&CC vide notification no. S.O. 3864 (E) dated 09.09.2024 while reiterating the mandatory requirement of prescribing of inlet parameters has also desired to lay down standards for specific quality parameters for discharge of effluent from each member industry to CETP based on design feature or capacity of CETP, and the member industries shall have to ensure that the quality and quantity of pre-treated effluent discharged to CETP shall not exceed the limit as mentioned by the State Board;

and whereas, for CETP to operate effectively and achieve desired outlet results, actual inlet parameters must align with Detailed Project Report (DPR) design parameters. Accordingly, member units are required to provide pre-treatment units in their premises. Further, pre-treatment standards are required to be prescribed and enforced;

and whereas, critical/primary parameters which can be controlled by the industry through process optimization and installation of pre-treatment facilities should be the focus of pre-treatment to be provided by the industries;

and whereas, an Expert Committee was constituted by the Punjab Pollution Control Board for getting recommendations on the proposed inlet standards for the CETPs operating in the State;

and whereas, the meetings / consultations with the concerned SPV / Association have been conducted with respect to the fixing of inlet standards for the CETPs and PETP for the member units at their outlets leading to the conveyance system of CETPs;

and whereas, in-house consultations have also been made by the Punjab Pollution Control Board with the concerned field offices to understand the local needs and conditions, processes involved, treatment constraints and operational bottlenecks;

and whereas, all the technical aspects for prescription of inlet quality standards of the CETP have been considered by the Board;

and whereas, after considering the deliberations held with the SPV/ Association, concerned offices of the Board and views of the Expert Committee constituted in the matter, the inlet quality standards for the influent being received at CETP of 50 MLD for dyeing cluster at Tajpur Road, Ludhiana and primary effluent treatment standards for the member units at their outlets are prescribed as under:

S.N.	Parameters	Inlet quality standards at the inlet of CETP	PETP standards for Member Units
1.	pH	6.0 – 9.0	6.0 – 9.0
2.	Bio-chemical Oxygen Demand (BOD) (mg/l)	350	325
3.	Chemical Oxygen Demand (COD) (mg/l)	800	750
4.	Total Suspended Solids (TSS) (mg/l)	400	350
5.	Total Dissolved Solids (TDS) (mg/l)	1900	1900

Note:

a) For rest of the influent quality parameters at the inlet of CETP (including Ammonical Nitrogen), Special Purpose Vehicle (SPV) shall ensure that same must be align to the DPR design parameters as proposed while availing grant in aid from the Ministry of Environment and Forest & Climate Change for the establishment of CETP (Annexure– I).

b) Member units shall optimize their processes as well as install pre-treatment units in their premises so as to ensure that effluent being discharged at their outlets (leading to conveyance system of CETP) shall be within the above stated pre-treatment standards prescribed for member units.

c) Member units engaged in cotton dyeing or any other dyeing having source of high TDS shall segregate high TDS streams and provide advanced treatment (RO, MEE etc.)

within their premises to achieve the prescribed TDS standard. Alternatively, these member units can adopt advanced techniques like salt-less dyeing or CO_2 dyeing. Additionally, these industries to undertake process modifications such as rotating dyeing processes with acrylic and polyester and using low-TDS salts to mitigate the high TDS issue.

d) SPV operating CETP shall conduct an adequacy assessment of the existing treatment systems, considering the higher inlet parameter values compared to the DPR and non-achievement of desired results. Based on this assessment, necessary upgrade and augmentation of CETP shall be carried out in a time-bound manner to achieve the desired effluent quality standards.

e) The member units shall provide an equalization tank of sufficient capacity in their premises to regulate the influent flow, shock loading & variable effluent characteristics. The member units shall release uniform flow from their respective outlets to the conveyance system leading to CETP, so as to have a controlled and equalized flow at inlet of CETP.

f) The member units shall provide Online Effluent Monitoring System for parameters for which PETP standards have been prescribed and shall ensure that their effluent parameters shall meet with prescribed PETP standards at their outlets leading to conveyance system of CETP. The online data of effluent quality of member units shall have an access with CETP operator as well as with PPCB.

g) The CETP operator shall provide Online Continuous Effluent Monitoring System (OCEMS) for parameters for which inlet quality standards have been provided & shall ensure that their effluent characteristics shall meet with prescribed standards. The OCEMS data of influent quality at inlet of CETP shall have access to PPCB.

and whereas, any person interested in making objections and suggestions on the proposal contained in the draft order may forward the same to the office of Member Secretary, Punjab Pollution Control Board, Vatavaran Bhawan, Nabha Road, Patiala – 147001, in person or in writing or at email hq2see@yahoo.com within 30 days from the date of publication of these draft standards.

and whereas all the objections and suggestions received by the Board within 30 days will be considered alongwith any other relevant aspects and the objections and suggestions received after the stipulated period of 30 days shall not be entertained.

After considering all the objections and suggestions received within the stipulated period of 30 days, the Punjab Pollution Control Board will issue the final order to prescribe the inlet quality standards and primary effluent treatment standards for member units for 50 MLD CETP for dyeing cluster at Tajpur Road, Ludhiana.

Chairperson

O/C

Endst. No. 29546 Dated 22/8/25

A copy of the above is forwarded to the members of the Expert Committee constituted by Punjab Pollution Control Board, Patiala in the matter for information and further necessary action, please.

Member Secretary
O/C

Endst. No. 29547-51 Dated 22/8/25

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

1. The Chief Environmental Engineer, Punjab Pollution Control Board, Ludhiana.
2. The Senior Environmental Engineer, Punjab Pollution Control Board, Zonal Office-1/2, Ludhiana.
3. The Senior Law Officer, Punjab Pollution Control Board, Patiala.
4. The Environmental Engineer, Punjab Pollution Control Board, Regional Office-1, Ludhiana and requested to inform all the member units as well as SPV for the above proposed standards.
5. The Environmental Engineer (Computer), Punjab Pollution Control Board, Patiala. He is requested to upload the order on the website for information of the all conderned.

Member Secretary
O/C

Endst. No. 29552-56 Dated 22/8/25

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

1. The Secretary to Government of Punjab, Department of Science, Technology and Environment, Chandigarh.
2. The Secretary to Government of Punjab, Department of Industries & Commerce, Chandigarh.
3. The Vice Chairperson, Punjab Development Commission, Punjab Civil Secretariat, Sector-1, Chandigarh.
4. The Chief Executive Officer, Punjab Bureau of Investment and Promotion, Sector-17, Chandigarh.
5. The Director, Directorate of Environment and Climate Change, MGSIPA Complex, Sector 26, Chandigarh.

Member Secretary
O/C

Endst. No. 29557 Dated 22/8/25

A copy of the above is forwarded to the Chairman/ Chief Executive Officer, Punjab Dyers Association 50 MLD CETP Plant, Backside Central Jail, Tajpur Road, Ludhiana, for information, necessary action and circulating to all their member units for submitting their suggestions/ objections (if any).

Member Secretary
O/C

Endst. No. 29558 Dated 22/8/25

A copy of the above is forwarded to the Member Secretary, Central Pollution Control Board, Parivesh Bhawan, East Arjun Nagar, Delhi-110032 for information, please.

Member Secretary
O/C

Annexure – I

S.N.	Parameters	Values
1.	Chromium (mg/l)	0-0.05
2.	Sulphide (mg/l)	<1.0
3.	Oil & Grease (ppm)	2-5
4.	Phenolic Compound (ppm)	0.1
5.	SAR	6-11
6.	RSC (Meq/l)	2.5-4
7.	TKN (mg/l)	35
8.	Phosphorous as PO4 (mg/l)	9

PUNJAB DYERS ASSOCIATION
(A Company incorporated under Section 25 of the Companies Act, 1956)
CIN : U93000PB2010NPL033734 | GST No: 03AAFCP4960L1Z8
A SPV FOR 50 MLD COMMON EFFLUENT TREATMENT PLANT (CETP)
REGD. OFFICE : 50 MLD CETP PLANT, ADJOINING CENTRAL JAIL, TAJPUR ROAD, LUDHIANA - 141007 (PUNJAB)
E-mail : punjabdyers@gmail.com | Mobile : 93578-50500, 98150-03584

Dated: 22-09-2025

To

The Member Secretary
Punjab Pollution Control Board
Patiala, Punjab

Subject : Suggestions/ Objections to proposed Inlet Quality Standards for 50 mld CETP for Dyeing industries at Tajpur Road, Ludhiana

Ref : Order No 369 dated 22.8.2025

Sir

The following has been brought to our attention with opportunity to file objections/ suggestions within 30 days regarding proposed CETP inlet standards and also proposed PETP effluent standards required to be installed at member industries to CETP, vide above referred order dated 22.8.2025:

1. The proposed PETP effluent standards and CETP inlet standards are based on CETP design parameters considered in the DPR, views of expert committee constituted by PPCB for getting recommendations on the proposed CETP inlet standards in State of Punjab, deliberations held with SPV , inhouse consultations with concerned field staff to understand local needs and conditions.
2. The proposed CETP inlet and PETP standard parameters are as under

S no	Parameter	Inlet quality standard at inlet of CETP	PETP standard for member industries
1	pH	6.0-9.0	6.0-9.0
2	BOD	350	325

3	COD	800	750
4	TSS	400	350
5	TDS	1900	1900

3. For rest of influent quality parameters at CETP inlet, it is proposed vide note 1 of the order that SPV shall ensure that same must align to DPR design parameters as proposed while availing grant in aid from MoEFCC as below (Annexure 1 of order dated 22.8.2025

S no	Parameter	Value
1	Chromium (Cr) (mg/l)	0-0.05
2	Sulphide (mg/l)	<1.0
3	Oil & Grease (mg/l)	2-5
4	Phenolic Compounds (mg/l)	0.1
5	SAR	6-11
6	RSC (mg/l)	2.5-4
7	TKN (mg/l)	35
8	Phosphorus (mg/l)	9

4. Vide note (b) of the order member units are required to install pre treatment units in their premises to ensure effluent at their out let shall be with in parameters as at 3 above. Further, vide note (c) the order proposes that members engaged in cotton dyeing or any other dyeing having source of high TDS stream to provide advance treatment (RO, MEE etc) with in premises to achieve prescribed TDS standard (as at para 3 above) or in alternate adopt advanced techniques like salt less dyeing using CO2. Additionally these units

are required to undertake process modification such as rotating dyeing process with acrylic and polyester and using low TDS salts to mitigate high TDS issue. Vide note (e) member units are proposed to require to install an equalization tank of sufficient capacity in their premises to regulate influent flow, shock loading , and variable effluent characteristics so as to release uniform and equalized flow from their outlets to conveyance system leading to CETP. Vide note (f) member units are required to install OCEMS for proposed parameters (as at 3 above) which shall provide access to CETP and PPCB.

5. Vide note (d) SPV is required to conduct an adequacy assessment of existing treatment system considering higher inlet parameter values compared to DPR and non achievement of desired results. Based on this assessment necessary upgrade of CETP shall be carried out in time bound manner to achieve desired effluent quality parameters.

6. Vide note (g) CETP operator is required to install OCEMS for CETP proposed inlet parameters (as at para 2 and 3 above) and provide its access to PPCB and further ensure CETP effluent meets prescribed effluent standards.

7. BACK GROUND

(i) It is submitted that although all dying units at Ludhiana had provided required ETP in respective unit and discharging their treated effluent in to municipal sewer with consent of PPCB, the PPCB persuaded dyeing industries at Ludhiana around year 2010 to join together and install a CETP for all dyeing units at 5 industrial area locations in Ludhiana to avail benefit of CETP like optimized use of land, scale of treatment,

better technical expertise, benefit due to mixing of different quality effluents and availability of Govt aid beside utlilisation of treated water for irrigation for which State Govt would provide necessary conveyance system at its own cost. Based on these assurances a DPR for 117 mld CETP for 5 industrial areas- Tajpur Road, Focal Point, Bahadurke Road, Industrial Area A and ..... was got prepared by PDA. 22 Acre land was allotted on lease near Jamalpur STP/ jail for CETP on lease to PDA. Irrigation & drainage Deptt prepared a project report for conveyance system for all STPs and CETPs at Ludhiana from proposed CETP site to areas at D/s side of Buddha Nala for irrigation of about 80000 acre land. Accordingly DPR was designed to achieve standards for several parameters as decided in meeting at CPCB considering that effluent will be used for irrigation and shall not be discharged in to Buddha Nala in vicinity of proposed site of 117 mld CETP. Based on these assurances, DPR and State Govt project for conveyance of treated effluent from CETP for all dyeing units at Ludhiana, necessary EC was obtained in year 2013 from MoEFCC in terms of EIA notification 2006 under EP Act 1986.

(ii) However, subsequent developments on techno economic considerations lead to Bahadurke Road industrial area opting out of 117 mld CETP and decided to construct a separate 15 mld CETP on ZLD basis at separate location for which separate EC was obtained by Bahadurke Road Knitwear & Textile Association in year 2014. Resultantly PDA got prepared a separate DPR for 40 mld CETP for dyeing industries at Focal point and 50 mld CETP for remaining dyeing industries mainly at Tajpur Road. CETP of 40 mld and 50 mld were based on same basis as for 117 mld CETP including use of treated effluent from CETP for irrigation purpose through state govt

assured conveyance system. Effluent parameters were also considered same as for use of treated water for irrigation purpose , suggested in meeting at CPCB. All the three DPRs were submitted to MoEFCC in Dec 2016 through PPCB for approval and sanction of grant in aid from Central and State Govt as per CETP scheme of MoEFCC. The MoEFCC sanctioned 40 mld project for grant in aid under CETP scheme with condition that treated effluent from CETP shall be discharged at out let of nearby Jamalpur STP. Same effluent discharge condition was made applicable to 50 mld CETP by Hon'ble NGT vide its order dated 20.1.2020 in sanction of 50 mld CETP by MoEFCC in Nov 2019. The State Govt has not provided promised conveyance system for use of CETP effluent for irrigation purpose. The PPCB thus prescribed consent condition and allowed CETP effluent o be discharged in to Buddha Nala at about 50 m U/S of discharge point for Jamalpur STP (225 mld) allowed through consent by PPCB. The 50 mld CETP has quite stablised membership of 108 industries which are broadly engaged in Yarn, Polyester and cotton and Cotton dyeing. Abou1 40 percent units are engaged in Polyester & cotton dyeing while remaining are 20 percent each on total volume of effluent discharge basis. Presently all three CETPs (15 mld, 40 mld and 50 mld) for dyeing industries at Ludhiana are allowed to discharged treated effluent in to Buddha Nala U/S of STP and CPCB evaluates their performance as per MoEFCC standards notified on 1.1.2016 for discharge of CETP effluent in to drain. In the meeting chaired by Hon'ble Minister for Industries in which Chairman PPCB was also present, PPCB has assured that effluent standards prescribed vide MoEFCC notification dt 1.1.2016 shall be applicable to CETPs. PDA has already requested PPCB vide letter/ mail dated 3.9.2025 to confirm the same. However, no reply has been received from PPCB so far. PPCB has also

not notified CETP inlet standards in terms of notification dated 1.1.2016 which has direct bearing on treatment efficiency of CETP. A copy of process flow diagram of 50 mld CETP is enclosed for ready reference.

(iii) The MoEFCC notification dated dated 9.9.2024 casts additional responsibility upon State Board (PPCB in our context) to prescribe PETP standards for each constituent member unit of a CETP in terms of said notification.

8. OBJECTIONS/SUGGESTIONS

(a) Preliminary Objections

(i) The composition of expert committee mentioned in order dated 22.8.2025 is not known to SPV. SPV has not got any opportunity to interact with said committee nor its views/ recommendations have been shared with SPV. It seriously hampers our ability to submit objections/ suggestion to order dated 22.8.2025.

(ii) The PPCB has not mentioned specifically the CETP outlet parameter limits/ prescribed standards. These need to be incorporated in proposed order itself. The SPV believes and considers that CETP is required to comply CETP effluent standards as prescribed for effluent discharge in to drain vide notification dated 1.1.2016 as amended vide notification dated 9.9.2024. Accordingly, the instant objections/ suggestions be considered. Prescribed CETP out let standards has directv bearing on acceptable CETP inlet standards. The SPV has considered CETP equalization tank as CETP inlet, as PPCB takes sample for CETP inlet from equalization tank.

(iii) The order dated 22.8.2025 does not prescribe PETP standards for each constituent unit of CETP as prescribed vide notification dated 9.9.2024. The PPCB needs to prescribe PETP standards for each member unit/ type of member unit depending upon its type of dyeing, after taking CETP inlet standards in to consideration and allowing admissible concession/ relaxation that is available to each type of dyeing due to all member units being connected to CETP, contributing about 50 mld to CETP cumulatively.

(iv) The PPCB has not considered local condition that CETP is discharging effluent in to Buddha Nala as per consent granted by PPCB. The Buddha Nala finally meets River Satluj whose water is found under C lass as per CPCB classification/ monitoring.

(b) OBJECTIONS/ SUGGESTIONS

(i) The PPCB has prescribed CETP inlet standards for BOD, COD and TSS parameters lower/ lesser than considered in the DPR. No reason for same has been furnished. The CETP inlet parameter limits be kept same as in DPR.

(ii) PPCB has prescribed PETP standard as same for member units as proposed at CETP inlet. This is against very principles of CETP as it denies member units to benefit each other through different balancing characteristics of effluents being discharged for member units. It also makes CETP an unviable option. MoEFCC notification dated 9.9.2024 explicitly requires State Board (PPCB) to prescribe PETP standard for each unit after considering CETP design and local conditions. For example, certain member units discharge very low TDS

effluents (500- 700 mg/l) while many member units discharge effluents with High TDS- 4000- 8000 mg/l (TDS reducing generally with each bath too). Similar would be position for discharge of phenolic compounds, O& G etc. Proposed PETP standards for TDS deny advantage to all member units for such variations in effluent characteristics at each member unit. Although proposed order does prescribe certain measures for certain type of dyeing, it has little meaning or sanctity in practice unless each unit is bound by specific standards for each parameter after study of each member unit by PPCB. Present prescription will be difficult to monitor to detect violations. Ultimate effect will fall upon CETP only. Therefore, it is requested that PPCB may conduct detailed study of each member unit, take in to account the CETP design parameters, allow mutual advantage of collective treatment at CETP by overall adherence to CETP inlet standards and prescribe PETP standards to each member unit, more specifically at least for TDS and Phenolic Compounds, O/G and sulphide in relevant cases, through consent mechanism under intimation to SPV of CETP. Further PPCB is suggested to ensure that no variation in raw material, process, volume of effluent, machinery is allowed without approval of PPCB and recommendation of SPV.

(iii) The parameters usually tested in the effluents of CETP by PPCB so far during 2022-June 2025 indicate that out of all parameters mentioned in para 3, Sulphide exceeded prescribed effluent limit only in June, July 2022, March 2025 and CPCB sampling on 24.12.2024. Phenolic compound exceeded prescribed parameter limit only in June 2022, Aug 2024 and CPCB sampling 24.12.2024. It is highly probable that these results are exception. CPCB monitoring results have already been explained as highly improbable" in our submission before

your good self and Hon'ble NGT. The parameters of SAR and RSC are relevant only when treated water is to be used for irrigation purpose. The prescribed standard for SAR in Notification dt 1.1.2016 is 26 which is exceeded in Jan 2023, Feb 2023, April 2022, Nov 2022 only. O/G exceeded limit only in June 2022, Sept 2022, March 2024. This could also be explained as exception, more so as Oil and Grease Removal system has been provided at CETP. Ammoniacal N never exceeded the limits and Phosphorus is not tested by PPCB. Further OCSMS facility is not available for any of the parameters mentioned in para 3 above and P is not considered by PPCB so far. Therefore, there is little/ no reason for testing of these parameters at CETP/ member unit level and these do not require OCMS at unit and CETP in our humble submission. Out of parameters mentioned in para 2, COD exceeded prescribed standard only in March 2023 and March 2024 which could be either an exception or time factor dependent job works. Thus, this could at best be monitored manually in month of every March to reach a definite conclusion. TSS exceeded limit only in March 2024 which seems an exception and pH never exceeded prescribed effluent standards. It is therefore requested that **OCEMS at inlet for only TDS, BOD need to be prescribed at CETP. It is suggested that at member unit level, only select member units may be asked to install OCEMS only for TDS** and provide its access to CETP and PPCB. PPCB may decide and notify at its level the units which PPCB are required to be monitor, preferably on weekly basis for phenolic compounds and sulphides, under intimation to SPV as presence of these in excess could affect CETP efficiency. It is further suggested that such sampling be carried out on composite sampling basis for at least 4 hours in each case. It is further submitted that OCEMS is not readily available in market for parameters listed out in para 3 above.

(iv) **Requirement of providing equalization tank at member unit level will open requirement of pumping of effluent in to sewer line connected to CETP and thus posing enhanced probability of bye pass of effluents. It is therefore suggested that discharge of effluent should only be permitted through gravity in to sewer connected to CETP.**

(v) **No limit for parameters at para 3 above, except for O/G, phenol and sulphide be prescribed at CETP inlet.** In any case if considered necessary, it should conform to/ not less than CETP effluent standards as per MoEFCC notification as the CETP has arrangement to remove O/G and also provide for Physico- chemical treatment at CETP. CETP inlet parameter limit for O/G may be kept at least 20 mg/l and same as at outlet for phenolic compounds and sulphide, after fixing suitable standard for O/G, phenolic compound , sulphide at PETP for each unit, as per process details of the units.

(vi) In nutshell, in view of factual matrix explained above, OCEMS for only TDS and BOD be prescribed at CETP inlet. Manual periodic monitoring may be carried out by PPCB for the CETP inlet prescribed parameters at suitable frequency. OCEMS only for TDS be prescribed at suitable member units depending upon type of dyeing being carried out at the unit. Manual composite monitoring for select parameters like sulphde , phenol be carried out only at select units periodically by PPCB depending upon type of dyeing being under taken at respective member units.

(vii) Since the CETP is allowed under existing circumstances to discharge effluent in to Buddha Nala at point which is about 50 m U/S of point of discharge of treated sewage from Jamalpur STP, effective mixing of CETP effluent (50 mld) with STP treated sewage (225 mld) is available. Usual TDS of treated sewage from STP contains TDS of order of 600-700 mg/l . The TDS values of CETP effluent mostly range between marginally with in limit to 3400 mg/l. Further Buddha Nala is receiving 200 cusec raw water and its TDS values are found < 2100 mg/l as per monitoring by PPCB itself. Therefore it is requested that PPCB may exempt 50 mld CETP from complying with TDS standards at CETP outlet.

(viii) PPCB may prescribe mixing ratio of treated sewage from STP to CETP treated effluent. If required CETP is ready to shift its CETP effluent discharge point to STP outfall to literally comply with condition imposed by MoEFCC while sanction the project for grant in aid, as further amended by Hon'ble NGT vide order dated 20.1.2020.

(ix) The SPV of CETP may not be required to carry out any comprehensive adequacy study for CETP. However, SPV assures to take all necessary measures to improve CETP efficiency in case CETP is not meeting MoEFCC prescribed effluent standards consistently for six months.

We humbly request you to kindly consider afore mentioned submissions and also grant us an opportunity of hearing before taking any final decision in the matter.

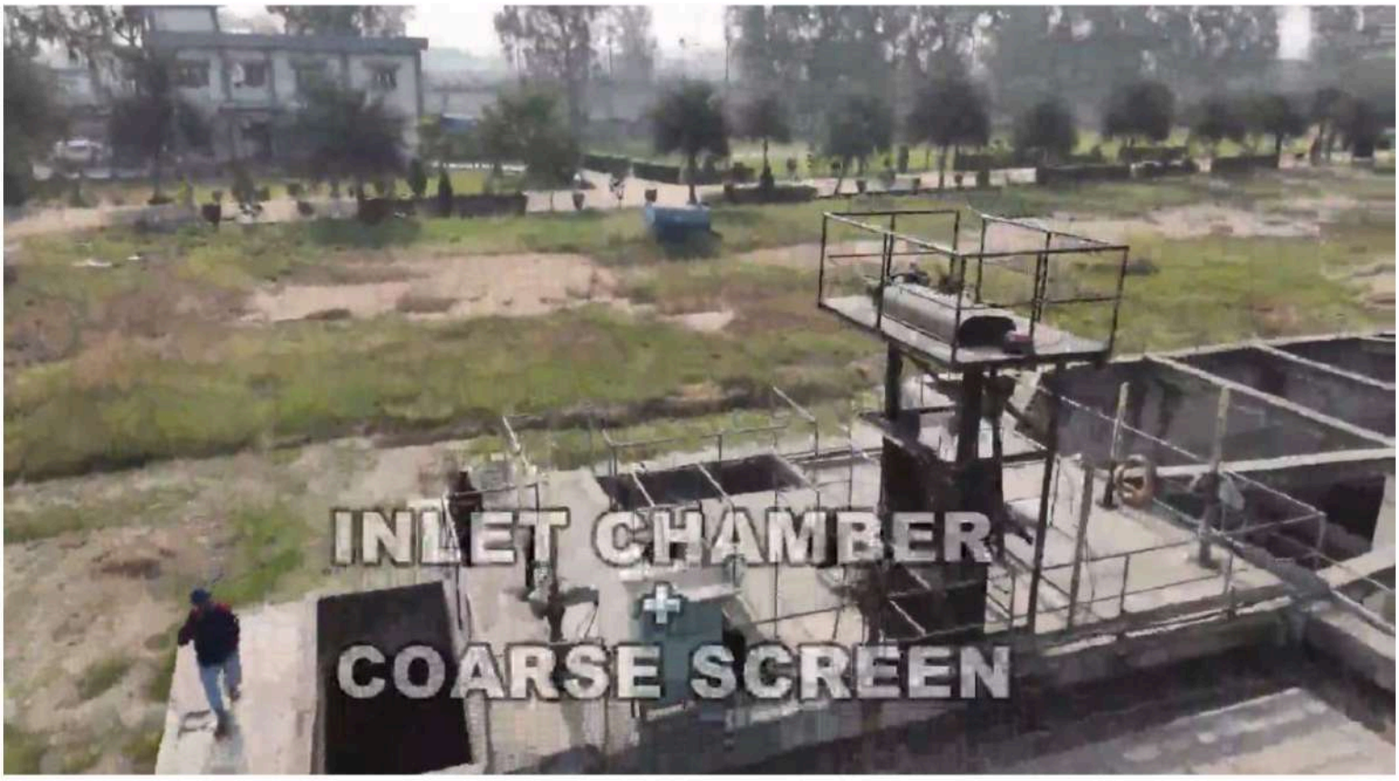
Thanking you

Yours sincerely

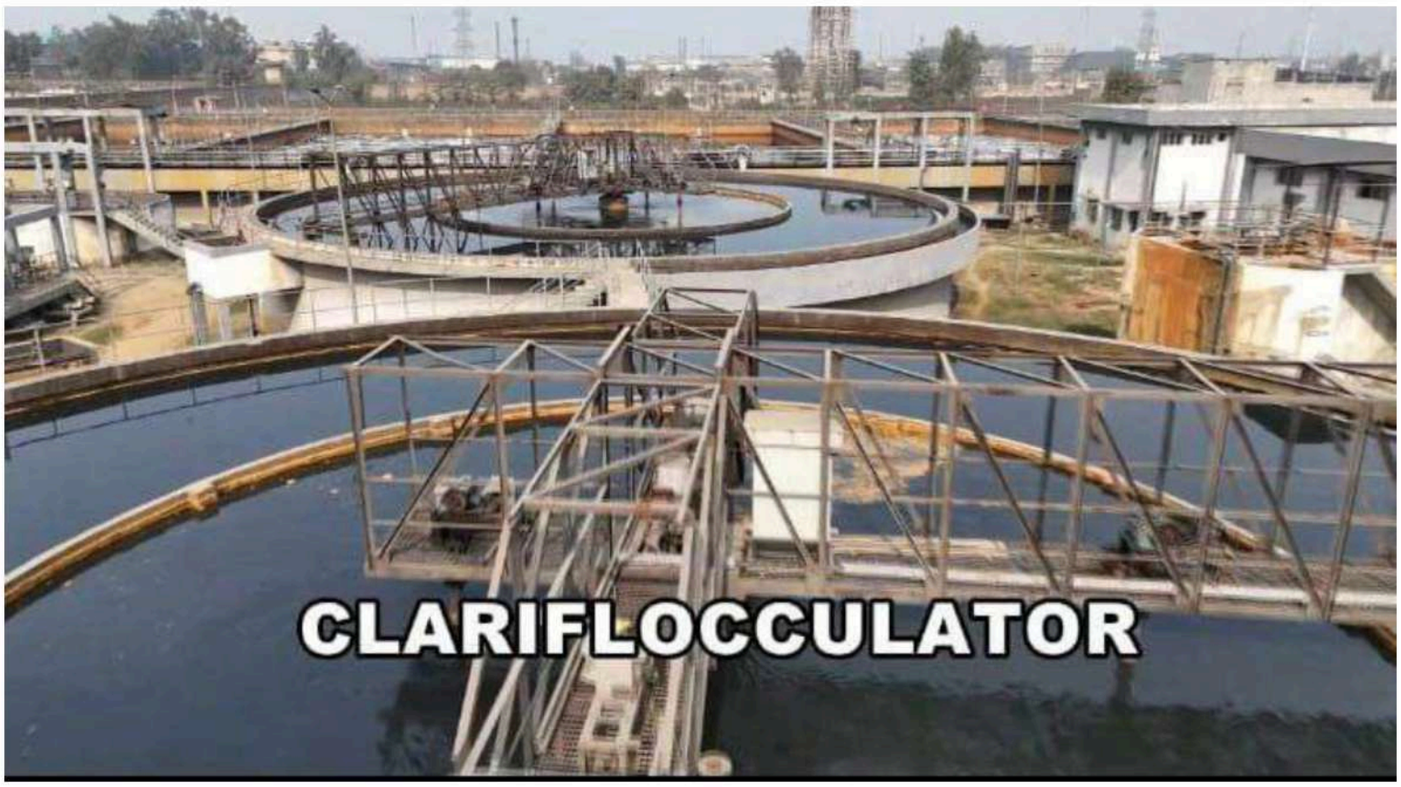
For Punjab Dyers Association

Directors

Annexure R-3 colly



25




SBR 4

27


CETP(40MLD+50MLD) DISCHARGE
INTO BUDHA NALAH SAMPLE


CETP(40MLD+50MLD) DISCHARGE
INTO BUDHA NALAH SAMPLE


BELT FILTER PRESS