

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

Miscellaneous Application no. 70/2023

In Original Application No. 105/2023

In the matter of

M.L Dhiman

..... Applicant

V/s

State of Punjab and Others

..... Respondent

Status report of Punjab Pollution Control Board, in compliance to order dated 25.01.2024 through Environmental Engineer, Regional Office, Mohali.

RESPECTFULLY SHOWETH

1. That briefly submitted, the matter is related to letter petition sent by M.L Dhiman, mentioning that there is a pharmaceutical unit namely M/s Akums Life Sciences Ltd., Village Sundran, Tehsil Derabassi, Distt. SAS Nagar, which is discharging chemical effluent leading to damage of crops and nearby agricultural fields. The letter petition was registered as Original Application No. 70 of 2023 titled as M.L Dhiman vs State of Punjab.
2. That the present status report is being filed in continuation to the earlier status report filed by the Punjab Pollution Control Board before

the Hon'ble National Green Tribunal on 22.01.2024.

3. That in compliance to the order dated 25.01.2024, it is submitted that the electric connection of the industry was temporarily restored by the Board for a period 03 months i.e. from 30.11.2023 upto 29.02.2024 and 'consent to operate' under the Water (Prevention & Control of Pollution) Act, 1974 and Air (Prevention & Control of Pollution) Act, 1981, was granted for the same period of time upto 29.02.2024 by the Board subject to certain conditions and the following special conditions:

- a. *Additional APCD will be installed in addition to the cyclone already installed with the boiler within 3 months.*
- b. *The industry will install STP for the treatment of domestic waste water within 3 months.*
- c. *The industry will install ATFD with the ETP system within 3 months.*
- d. *The industry shall carryout the Environmental Audit Study Report for the area inside the industry and outside the industry and shall include ground water study, ambient air quality monitoring, Solvent Recovery Plant audit, ETP audit which should include the adequacy of Zero liquid discharge based technology ETP from a Technical Institute of good repute and submit the report within 3 months.*
- e. *The industry shall submit a material balance statement for all the product being manufactured within 3 months.*



f. The industry shall submit a Water balance statement for all the product being manufactured within 3 months.

4. That in reply to the direction of this Hon'ble Tribunal as contained in order dated 25.01.2024 as to what prompted the Board to change its earlier decision and permit the project proponent to operate though the above conditions (a) to (d) {as mentioned in para no.7 of the order dated 25.01.2024} were not fulfilled, it is respectfully submitted that the orders for disconnection of electricity supply were issued on 20.11.2023 on the basis of visit report of the officer of the Board dated 06.11.2023. The industry has submitted representation dated 21.11.2023 and 23.11.2023 mentioning therein that it has complied with the observations of the Board made during the visit on 06.11.2023 and requested for release of electricity connection. The officer of the Board visited the industry on 24.11.2023 and observed that the industry has complied with most of the deficiencies pointed out during the visit on 6.11.2023. The restoration of electricity connection was accordingly ordered for temporary period of 3 months from 30.11.2023 upto 29.02.2024. At the time of restoration of electricity connection for a period of 03 months, the special conditions as mentioned in para no.3 above were imposed for further improvements with regard to Environmental regulations and increasing efficiency & efficacy of the pollution control devices installed by the industry in its premises. These special conditions were in addition and apart from the existing compliances of Environmental Laws being done by the industrial unit.

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5. That further it is submitted that the site of the industry was visited by special committee constituted by the Board consisting of Er. Paramjit Singh Senior Environmental Engineer, Er. Arshdeep Singh, Assistant Environmental Engineer and Er. Mohit Singla, Assistant Environmental Engineer on 13.03.2024. The observations of the Committee of officers are reproduced below:

- a) *Before entering the establishment, the team has checked the vicinity of the unit and found that no outlet is being operated by the unit for discharge of its waste water, outside the premises. During the visit, the following observations were observed:*
- b) *The industry was found not in operation and no manufacturing activity was being carried out. Maintenance works of the industry were in progress. As per the record, the industry is not in operation for the last about ten day.*
- c) *The industry has installed 2 tube-wells for abstraction of ground water, which are equipped with separate water meters.*
- d) *The industry has installed new STP plant of capacity 50 KLD for treatment of its domestic effluent, which is under stabilization. At present the industry is treating its domestic effluent through its existing ETP only.*
- e) *Presently, discharge of domestic effluent is about 8 KLD, which after treatment is discharged onto land for plantation. The industry has newly developed 02 pockets of plantation*



area in its premises. The area of which is about 1.2 acres, which is adequate. The industry is in the process of development of another pocket of plantation area of around 01 acres, near its boiler area.

- f) The industry has not provided water meter on the outlet of the STP.
- g) The industry has installed effluent treatment plant (ETP) of capacity 200 KLD for treatment of its low TDS effluent, which was found in operation. However, at present only domestic effluent is being treated in the same, followed by RO system.
- h) The RO permeate is used for boiler and cooling water make up. However, at present, the RO permeate is being used onto land for plantation, as boiler and cooling towers are not in operation due to no production activities.
- i) The industry has also installed Multi Effect Evaporator (MEE) of capacity 130 KLD followed Agitated Thin Film Dryer (ATFD) of capacity 350 Kg/Hour for treatment of High TDS effluent and RO reject.
- j) At present, the industry is collecting the RO reject in HTDS collection tank, which will be further treated through MEE followed by ATFD, when the production in the plant is made operational.
- k) The condensate from MEE is fed into equalization tank of ETP and MEE concentrate is further treated through ATFD.

- l) *Samples of effluent from ETP inlet, RO feed, RO reject and RO permeate has been collected and will be sent to HO Lab, Patiala for further analysis.*
- m) *The industry has installed a new Agitated Thin Film Dryer (ATFD) of capacity 1300 Kg/Hour, which is under trial runs.*
- n) *The industry has also installed a boiler of capacity 6.0 TPH, which is based on rice husk as fuel. The same was found not in operation.*
- o) *The industry has provided multi cyclone separator as APCD with the boiler, followed by stack of adequate height.*
- p) *The industry is yet to provide additional APCD with the boiler i.e. Bag filter house. However, the industry has provided a water sprinkler system in the stack after APCD, as additional measure to capture particulate matter, till the installation of new additional APCD.*
- q) *The industry has informed that they have placed orders for the installation of Bag Filter as APCD. The same will be received in their premises shortly.*
- r) *The industry has provided 3 D.G sets of capacity 100 KVA, 625 KVA & 500 KVA, which are equipped with canopies & adequate stack heights.*
- s) *The representative of the industry informed that material balance and water balance has been submitted to PPCB. He further informed that recently TIET, Thapar institute, Patiala has carried out Environmental Audit Study and report will*



be submitted by end of this month.

- t) The industry has provided water meters on tube wells, ETP inlet, RO Feed, RO reject, RO permeate, MEE feed, MEE condensate etc, the readings of the same as noted during visit as tabulated below:-

- i. Tube-well -1 - 56943.644 m³.
- ii. Tube-well -2 - 8302.05 m³.
- iii. ETP Inlet - 12092.0 m³.
- iv. RO inlet - 15442.0 m³.
- v. RO Permeate - 2983.0 m³.
- vi. RO Reject - 4615.0 m³.
- vii. MEE Inlet - 16533.0 m³.
- viii. MEE Condensate - 21320.0 m³.
- ix. MEE concentrate - 150.0 m³.

A copy of the report submitted by the said committee is enclosed as **Annexure-A**.

6. That the committee of officers has also collected the effluent samples during visit on 13.3.2024 and the analysis results of the samples collected during visit on 13.03.2024 are reproduced below:

Sr. no	Parameters	ETP Inlet	RO Inlet	RO Permeate	RO Reject
1.	pH	7.2	7.9	6.8	7.3
2.	TSS mg/l	544	176	14	42
3.	COD mg/l	3400	560	BDL	100
4.	BOD mg/l	980	154	BDL	26
5.	Oil & Grease mg/l	10.8	4.3	BDL	BDL
6.	Ammonical	4.3	1.3	BDL	BDL

	Nitrogen mg/l				
7.	Phosphate mg/l	3.2	10	BDL	BDL
8.	Sulphide mg/l	15	BDL	BDL	BDL
9.	Phenolic Compound mg/l	BDL	BDL	BDL	BDL

A copy of the above analysis results is enclosed herewith as

Annexure -B

7. That in compliance to the direction of the Hon'ble Tribunal, the water balance of the industry is enclosed herewith as **Annexure - C**. The complete water balance statement alongwith details of quantity of effluent generated by the unit, its treatment, wastewater utilization and sludge generation & its disposal as prepared by the committee of officers for last six months istabulated herein below:

Monthly Average	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Average of last six months
Fresh water consumption (KLD)	100.93	97.54	96.9	120.48	112.09	101.5	104.91
LTDS (domestic) (KLD)	17.66	17.67	16.96	19.53	20.32	17.48	18.27
RO feed (KLD)	49.2	48.5	40.43	49.4	53.25	47.06	47.97
RO Permeate (KLD)	34.4	33.87	26.6	34.3 6	37.22	32.96	33.24
RO reject (KLD)	14.8	14.54	12.53	15	16.03	14.06	14.49

HTDS generation (KLD)	28.18	25.58	24.32	23.8	26.19	23.06	25.19
MEE condensate (KLD)	31	30.1	29.2	28.6 7	32.1	27.51	29.76
MEE concentrate (KLD)	4.43	3.96	3.73	3.16	2.77	2.68	3.46
Hazardous waste of category 37.3 (ATFD salt in MT) generation	36.96	40.75	35.46	43.36	43.15	47.56	
Hazardous waste of category 37.3 (ATFD salt in MT) disposed of to TSDF	21.27	65.91	24.67	44.61	34.4	51.12	
Hazardous waste of category 35.3 (ETP sludge in MT) generation	11.74	10.93	5.062	8.847	4.702	9.635	
Hazardous waste of category 35.3 (ETP sludge in MT) disposed of to TSDF	10.76	9.28	5.84	12.52	-	8.62	

8. That based upon the daily average of various parameters for last six

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months as mentioned above and operational status of the pollution control equipment's installed by the industry, the queries raised by the Hon'ble Tribunal in para no. 9 of the order dated 25.01.2024 are answered herein below in tabular form:

Sr. no.	Queries raised by the Hon'ble Tribunal vide dated 25.01.2024	Answer to the queries
i. ii.	The total water intake per day Water consumption in process and other utilities	104.91 KLD
iii.	Capacity of the effluent treatment plant;	Capacity of Effluent treatment Plant (for LTDS effluent) - 200 KLD Capacity of Multi Effect Evaporator (for HTDS effluent) - 130 KLD Capacity of Agitated Thin Film Drier (for MEE concentrate) - 1300 kg/hr
iv.	Capacity of the sewage treatment plant;	Capacity of newly installed STP (for domestic effluent) - 50 KLD)
v.	Waste water generation from the unit and the sewage;	LTDS generation (including domestic effluent & MEE condensate) - 48.03 KLD HTDS generation (including RO reject)- 39.68 KLD
vi.	Treated waste water quantity;	RO permeate - 33.24 KLD
vii	Utilization of the treated waste water and the areas/utilities where the treated wastewater is utilized along with the	RO permeate @ 33.24 KLD is used for cooling tower makeup and boiler makeup purposes within premises

	quantity;	
viii.	Details of the sludge and solid waste generated per day and its disposal;	The hazardous waste of the category 37.3 (ATFD sludge) and 35.3 (ETP sludge) is being disposed of to Common Hazardous Waste TSDF site of Punjab at Village Nimbua, Derbassi and the complete details are mentioned in Para no. 07 above.
ix.	Assessment of damage caused outside the premises of industry due to violations	The Punjab Pollution Control Board is regularly monitoring the industry from time to time and no illegal discharge of any trade effluent has been observed from the industry into adjoining agricultural fields since last 03 years. Hence, no damage has been caused by the industry

9. That the Punjab Pollution Control Board is taking appropriate action as per the provisions of the Environmental Laws, from time to time against the industry and will take further action, if the industry is found violating the environmental norms, at any point of time.
10. That the status report is hereby submitted in compliance to order dated 25.01.2024 for kind perusal and consideration of the Hon'ble Tribunal.

Date: 28.03.2024

Place: SAS Nagar


 28/03/2024
(Er. Gursharan Dass)
Environmental Engineer,
Punjab Pollution Control Board,
Regional Office, Mohali



PUNJAB POLLUTION CONTROL BOARD



PPCB/SPL/ No. 01

Dated: 13-03-2024

To

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

Subject: - Regarding Surprise Visit of M/s Pure and Cure Healthcare Ltd. (Akums Life Sciences Ltd.), Village Sundran, Derabsssi, SAS Nagar by the team constituted by the Competent Authority of the Board.

Ref: Board's letter no. 9382-84 dated 08.12.2023.

In reference to above, it is intimated that a team consisting of following members was constituted by the competent authority of the Board to visit the subject cited industry: -

1. Er. Paramjeet Singh, Senior Environmental Engineer
2. Er. Arshdeep Singh, Assistant Environmental Engineer
3. Er. Mohit Singla, Assistant Environmental Engineer

In compliance with the directions of the competent authority, the site of the industry was visited by the above said team on 13.03.2024. A copy of visit report is attached as **Annexure-A**.

During visit, effluent samples of the industry were also collected by the team and the same were sent to the Head Office, Laboratory for analysis.

This is for information and further necessary action, please.

PA/as above

[Signature] 13/3/24
Senior Environmental Engineer,
Zonal Office-1, Ludhiana

Subject: Regarding Surprise Visit of M/s Pure and Cure Healthcare Ltd. (Akums Life Sciences Ltd.), Village Sundran, Derabassi, SAS Nagar by the team constituted by the Competent Authority of the Board.

1.0 Background

In light of the directions issued by the Competent Authority of the Board vide Board's letter no. 9382-84 dated 08.12.2023, the subject cited industry was visited by a team comprising of the following officers of the Board on 13.03.2024, to verify the compliances of Environmental Laws.

1. Er. Paramjeet Singh, Senior Environmental Engineer
2. Er. Arshdeep Singh, Assistant Environmental Engineer
3. Er. Mohit Singla, Assistant Environmental Engineer

2.0 About the unit

The unit is a pharmaceutical unit and is engaged in manufacturing of bulk drugs and API using various chemicals and salts and was granted consent to operate under the Water Act, 1974 vide no. CTOW/Renewal/SAS/2023/24319425 dated 20/12/2023 and the Air Act, 1981 vide no. CTOA/ Renewal/ SAS/ 2023/ 24319427 dated 20/12/2023, both valid up to 29/02/2024 for manufacturing of Bulk Drugs and API i.e. Cefepime Hydrochloride @ 30Kgs/day Cefrozil @20Kgs/day Cefpodoxime Proxetil @ 100Kgs/day Ceftriaxone Sodium @ 100Kgs/day Cefixime @80 Kgs/day Cefdinir @10Kgs/day Cefuroxime Axetil Amorphous @126.67 Kgs/day with certain conditions mentioned therein.

3.0 Observations made during the visit

Before entering the establishment, the team has checked the vicinity of the unit and found that no outlet is being operated by the unit for discharge of its waste water, outside the premises. During the visit, the following observations were observed:

1. The industry was found not in operation and no manufacturing activity was being carried out. Maintenance works of the industry were in progress. As per the record, the industry is not in operation for the last about ten day.
2. The industry has installed 2 tube-wells for abstraction of ground water, which are equipped with separate water meters.
3. The industry has installed new STP plant of capacity 50 KLD for treatment of its domestic effluent, which is under stabilization. At present the industry is treating its domestic effluent through its existing ETP only.
4. Presently, discharge of domestic effluent is about 8 KLD, which after treatment is discharged onto land for plantation. The industry has newly developed 02 pockets of plantation area in its premises. The area of which is about 1.2 acres, which is adequate. The industry is in the process of

- development of another pocket of plantation area of around 01 acres, near its boiler area.
5. The industry has not provided water meter on the outlet of the STP.
 6. The industry has installed effluent treatment plant (ETP) of capacity 200 KLD for treatment of its low TDS effluent, which was found in operation. However, at present only domestic effluent is being treated in the same, followed by RO system.
 7. The RO permeate is used for boiler and cooling water make up. However, at present, the RO permeate is being used onto land for plantation, as boiler and cooling towers are not in operation due to no production activities.
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 9. At present, the industry is collecting the RO reject in HTDS collection tank, which will be further treated through MEE followed by ATFD, when the production in the plant is made operational.
 10. The condensate from MEE is fed into equalization tank of ETP and MEE concentrate is further treated through ATFD.
 11. Samples of effluent from ETP inlet, RO feed, RO reject and RO permeate has been collected and will be sent to HO Lab, Patiala for further analysis.
 12. The industry has installed a new Agitated Thin Film Dryer (ATFD) of capacity 1300 Kg/Hour, which is under trial runs.
 13. The industry has also installed a boiler of capacity 6.0 TPH, which is based on rice husk as fuel. The same was found not in operation.
 14. The industry has provided multi cyclone separator as APCD with the boiler, followed by stack of adequate height.
 15. The industry is yet to provide additional APCD with the boiler i.e. Bag filter house. However, the industry has provided a water sprinkler system in the stack after APCD, as additional measure to capture particulate matter, till the installation of new additional APCD.
 16. The industry has informed that they have placed orders for the installation of Bag Filter as APCD. The same will be received in their premises shortly.
 17. The industry has provided 3 D.G sets of capacity 100 KVA, 625 KVA & 500 KVA, which are equipped with canopies & adequate stack heights.
 18. The representative of the industry informed that material balance and water balance has been submitted to PPCB. He further informed that recently TIET, Thapar institute, Patiala has carried out Environmental Audit Study and report will be submitted by end of this month.

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4.0 Other observations

1. The industry has provided water meters on tube wells, ETP inlet, RO Feed, RO reject, RO permeate, MEE feed, MEE condensate etc, the readings of the same as noted during visit as tabulated below:-

- I. Tube-well -1 - 56943.644 m³.
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- III. ETP Inlet - 12092.0 m³.
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- VII. MEE Inlet - 16533.0 m³.
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- IX. MEE concentrate - 150.0 m³

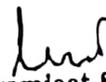
2. The analysis of record maintained for different water meters for the period of September, 2023 to February, 2024, is as under:

Monthly average (KLD)	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Average of last 06 months
Freshwater consumption (KLD)	100.93	97.54	96.9	120.48	112.09	101.5	104.91
LTDS (domestic)(KLD)	17.66	17.67	16.96	19.53	20.32	17.48	18.27
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HTDS generation (KLD)	28.18	25.58	24.32	23.8	26.19	23.06	25.19
MEE condensate (KLD)	31	30.1	29.2	28.67	32.1	27.51	29.76
MEE concentrate(KLD)	4.43	3.96	3.73	3.16	2.77	2.68	3.46
37.3 (ATFD salt inkg)	36958.83	40747	35460	43355	43145	47575	41206.81
35.3 (ETP sludge in kg)	11741.4	10933	5062	8847	4702	9635	8486.73

Date- 13.04.2024


Er. Mohit Singla

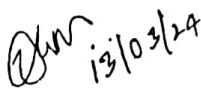

Er. Arshdeep Singh


Er. Paramjeet Singh

AEE

AEE

SEE


Sh. Vinayak Bhatt,

Director

**PUNJAB POLLUTION CONTROL BOARD VATAVARAN BHAVAN,
NABHA ROAD, PATIALA
WATER ANALYSIS REPORT**



- | | |
|--|--|
| 1. Laboratory Sample No. | E-5329-5332/H.O.Lab. Monitoring/2024 |
| 2. Name of Industry | M/s Akums Lifesciences, Ltd Sundran, Mubarakpur.
SAS Nagar (Pure & Cure Health Care Pvt. Ltd) |
| 3. Name of Sample collecting Officer | Er. Paramjeet Singh, SEE, Er. Arshdeep Singh. AEE
& Er. Mohit Singla, AEE |
| 4. Designation of authorizing Test | Environmental Engineer, Regional Office, Mohali. |
| 5. Type of Sample | Grab |
| 6. Date & Time of Sample collection | 13.03.2024 |
| 7. Date & Time of Sample receipt in Lab. | 14.03.2024 |
| 8. Period of Analysis | 14.03.2024 to 22.03.2024 |
| 9. Test Methods | As per relevant parts of IS:3025/IS:1622 &
Methods of APHA |

Results

Sr. No.	Parameters	ETP Inlet	RO Inlet	RO Permeate	RO Reject
1	pH	7.2	7.9	6.8	7.3
2	Total Suspended Solids mg/l	544	176	14	42
3	Chemical Oxygen Demand mg/l	3400	560	BDL	100
4	Bio-chemical Oxygen Demand mg/l	980	154	BDL	26
5	Oil & Grease mg/l	10.8	4.3	BDL	BDL
6	Ammonical Nitrogen mg/l	4.3	1.3	BDL	BDL
7	Phosphate mg/l	3.2	10	BDL	BDL
8	Sulphide mg/l	15	BDL	BDL	BDL
9	Phenolic Compound mg/l	BDL	BDL	BDL	BDL

Remarks: No Specific Standard Prescribed as per E.P.A. However, if any stringent/other standards have been imposed by the Board, the same shall prevail.

Note: BDL means Below Method Detection Limit.

---End of Report---

Endst. No: 8072-74

Di. 26/3/24

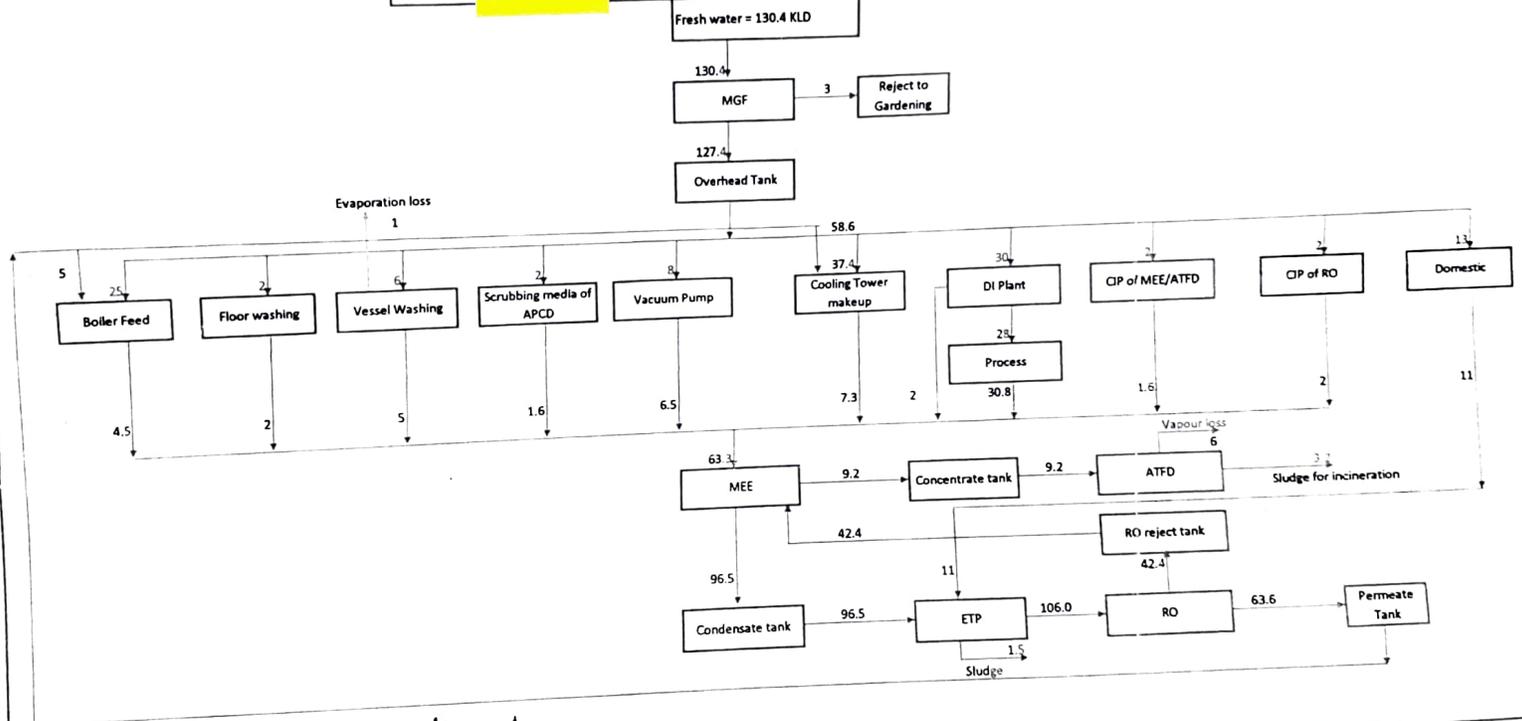
Scientific Officer

A copy of the above is forwarded to the: -D B

1. The Chief Environmental Engineer (Water), Punjab Pollution Control Board, Ludhiana.
2. The Senior Environmental Engineer, Punjab Pollution Control Board, Zonal Office-I, Patiala.
3. The Environmental Engineer, Punjab Pollution Control Board, Regional Office, Mohali.

Asstt. Scientific Officer

234 WATER BALANCE



All figures are in 'KLD'

M/s Advance Environ-Solution

Partner