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

(Original Application No.16 of 2021)

IN THE MATTER OF:

Vinit Kumar ..... **Applicant**

Versus

DSM Sugar Mills Ltd. & Ors. ..... **Respondents**

PAPER BOOK

(FOR INDEX PLEASE SEE INSIDE)

Advocates for the Respondent No.1: Mr. Anubhav Anand Aron & Mr. Abhinav Anand

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Date: 19/08/2021

(1)

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

(Original Application No.16 of 2021)

IN THE MATTER OF:

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Versus

DSM Sugar Mills Ltd. & Ors. ..... **Respondents**

REPLY /SUBMISSIONS FILED ON BEHALF OF THE RESPONDENT NO.1 i.e. DSM SUGAR MILLS LTD.

MOST RESPECTFULLY SHEWETH:

1. That the Respondent No.1 is an industrial unit belonging to M/s Dhampur Sugar Mills Ltd., which is a company registered under the Companies Act, 1956 and now under the Companies Act, 2013 having its Corporate Office at: 241, Okhla Industrial Estate, Phase – III, New Delhi – 110020 and are engaged in the business of manufacturing & sale of sugar and other related products. That the Respondent No.1 is operating with due compliances with all rules & regulations and various direction issued time & again.

2. That the Respondent No.1 is filing this present Reply /Submissions through Sh. Amit Sharma who is working as Senior General Manager (Commercial) with the said Dhampur Sugar Mills Ltd. and who has been, vide Board Resolution dated 13.02.2018, duly authorized to sign & verify this present Reply /Submissions, to file documents, to sign Vakalatnama, to depose before the Hon'ble Tribunal and to do all such other act(s) as

may be necessary for this present Reply. Copy of the Board Resolution dated 13.02.2018 is annexed as **Annexure: R1/A**.

3. That the Applicant has filed the captioned Original Application under Section 14 and 15 read with Section 20 of the National Green Tribunal Act, 2010 thereby alleging air and water pollution caused by the Respondent No.1 in Mansurpur, Muzaffarnagar, Uttar Pradesh. That prima facie the captioned Original Application is totally misconceived and is based on false narration. That the complaint in the captioned Original Application is primarily based on an Analysis Report [annexed as Annexure 4 along-with the captioned Original Application], which contains an analysis of the samples drawn from a common drain containing effluent from a nearby distillery, namely, M/s Sir Shadilal Distillery & Chemical Works also *[Sample Collection: Husain Pur Bhopada Mod DSM Sugar Mill and Sir Shadi Lal Distillery Mansurpur ka Outlet Nala Jo Kaali Nadi mai Girta hai].* That a distillery is supposed to be ZLD compliant, however, it is an established fact that the said M/s Sir Shadilal Distillery & Chemical Works discharges its treated /untreated effluent in the common drains.

4. That this Hon'ble Tribunal, vide Order dated 28.01.2021, has directed to constitute a joint committee of the CPCB and the UPPCB to ascertain facts and to furnish a factual and action taken report in the matter. That in compliance to the aforesaid directions issued by this Hon'ble Tribunal, the inspection of the Respondent No.1 was conducted by the Joint

Inspection Team on 09.03.2021 and a Joint Inspection Report was filed on 29.06.2021 before this Hon'ble Tribunal. Print Out of the Joint Inspection Report dated 09.03.2021 downloaded from the web-site of this Hon'ble Tribunal is annexed as **Annexure: R1/B**.

5. That during the Inspection of the Respondent No.1 conducted on 09.03.2021, the Joint Inspection Team collected effluent samples from the ETP inlet, outlet and various units of ETP and treated effluent storage lagoon including outlet of irrigation pipeline as well as Gram Sabha pond. That the Table – 3 of the said Joint Inspection Report dated 09.03.2021 contains the analysis results of the aforesaid samples collected by the Joint Inspection Team. That perusal of the said Table – 3 of the said Joint Inspection Report dated 09.03.2021 shows that the parameters of the aforesaid samples collected from the ETP Outlet, Lagoon, Irrigation Pipeline, Cooling Tower Over-flow and values of OCEMS are withing the notified standards. That the aforesaid fact is also reflected from the Observation Nos.17 & 18 of the said Joint Inspection Report dated 09.03.2021.

6. That, further, during the Inspection of the Respondent No.1 conducted on 09.03.2021, the Joint Inspection Team has also collected ground water samples from bore-well – 03 installed inside the premises of the Respondent No.1 and also from a hand-pump located outside the premises of the Respondent No.1. That the Table – 7 of the said Joint Inspection Report dated 09.03.2021 contains the analysis results of the

aforesaid ground water samples collected by the Joint Inspection Team. That perusal of the said Table – 7 of the said Joint Inspection Report dated 09.03.2021 shows that the parameters of the aforesaid ground water samples are within the acceptable limit of Drinking Water Standards (BIS) IS 10500:2012. That the aforesaid fact is also reflected from the Observation Nos.30 & 31 of the said Joint Inspection Report dated 09.03.2021.

7. That, moreover, the Respondent No.1 has also installed a Sewage Treatment Plant (STP) having capacity of 120 KLPD for the treatment of the domestic waste generated from its residential colony. That during the Inspection of the Respondent No.1 conducted on 09.03.2021, the Joint Inspection Team has also collected samples from the inlet and outlet of the said STP of the Respondent No.1. That the Table – 8 of the said Joint Inspection Report dated 09.03.2021 contains the analysis results of the aforesaid samples from the inlet and outlet of the said STP of the Respondent No.1 collected by the Joint Inspection Team. That perusal of the said Table – 8 of the said Joint Inspection Report dated 09.03.2021 shows that the parameters of the sample of the STP outlet are within the notified effluent discharge norms. That the aforesaid fact is also reflected from the Observation Nos.32 & 34 of the said Joint Inspection Report dated 09.03.2021.

8. That other relevant observations made by the Joint Inspection Team in the said Joint Inspection Report dated 09.03.2021 are as under:

a) Observation No.8: Unit is having valid Consent to Operate under Section 21/22 of the Air (Prevention & Control of Pollution) Act, 1981 and under Section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974 for discharge, both valid up-to 31/12/2024;

b) Observation No.9: The unit is also having valid Authorization under the provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 for storage and disposal of hazardous wastes valid up to 19.02.2022;

c) Observation No.10: The unit has provided log book for the generation of used oil, which is mixed with bagasse and burnt in boiler. The average generated quantity of used oil is 1.04 kg/day, which comply the authorized quantity i.e. 5.0 kg/day;

d) Observation No.14: The unit has installed flow-meter at main inlet channel (Flow – 29.97 m^3/hr, Totalizer 547719 m^3) and outlet of ETP (Flow -- 40.8 m^3/hr, Totalizer 0.0 m^3);

e) Observation No.15: The unit is complying w.r.t. final treated effluent discharge volume norms as the treated effluent generation i.e. 174.752 Liter/Ton of cane crushed as against norms of 200 Liter/Ton of cane crushed;

f) Observation No.19: As per the Irrigation Management Plan, the Unit provided affidavit copy of 09 farmer's regarding use of treated effluent for irrigations in fields;

g) Observation No.20: The unit has set-up environmental laboratory and sufficient chemicals were found available for analysis of daily

parameters. The unit has maintained the ETP log book for daily analysis of effluent parameters;

h) Observation No.22: Boiler ash and press mud were observed to be collected separately in open area located 2.0 km far from the unit. Sludge after drying mixed fly ash & press mud to form bio-manure & distributed free of cost to sugar cane growers.

9. That the Joint Inspection Team, vide the said Joint Inspection Report dated 09.03.2021, has issued several recommendations for the Respondent No.1. That the Respondent No.1, vide its Letter bearing Reference No.: DSM/MSM/887-89/12 08/2021 dated 29.07.2021 issued in favor of the Respondent No.3, has submitted its point-wise Reply to the said recommendations made by the Joint Inspection Team in the aforesaid Joint Inspection Report dated 09.03.2021. That further, the Respondent No.1, vide its Letter bearing Reference No.: DSM/MSM/891-893/12 08/2021 dated 11.08.2021 issued in favor of the Respondent No.3, has submitted its "additional submissions". Copy of the Letter bearing Reference No.: DSM/MSM/887-89/12 08/2021 dated 29.07.2021 issued by the Respondent No.1 is annexed as **Annexure: R1/C**. Copy of the Letter bearing Reference No.: DSM/MSM/887-89/12 08/2021 dated 11.08.2021 issued by the Respondent No.1 is annexed as **Annexure: R1/D**.

10. Compliance Status with respect to the recommendations made by the Joint Inspection Team, vide the said Joint Inspection Report dated 09.03.2021:

a) Recommendation No.1: That the said pipelines /openings are actually drains of the domestic water and general toilets being used by the farmers. That with respect to the effluent of the unit of the Respondent No.1, it is submitted that the Respondent No.1 have only single outlet point (MS pipeline) from the unit of the Respondent No.1 through which the effluent is transferred to its ETP.

b) Recommendation No.2: That the work of optimizing the rotation speed of oil and skimmer for proper removal of floating oil & grease from effluent shall be completed before the start of the next crushing season, which will start in the first week of Oct, 2021

c) Recommendation No.3: That the Respondent No.1 strictly follow the guidelines /directions issued by the CPCB and/or UPPCB time & again with respect to the discharge of effluent from the unit of the Respondent No.1. That whatsoever effluent is generated by the unit of the Respondent No.1, the said effluent is used for irrigation purposes as per the norms. Copy of the Plan for *"Utilization of Treated Effluent for Irrigation Purposes"* prepared by the National Sugar Institute, Kanpur (U.P.) is annexed as **Annexure: R1/E**.

It is, however, pertinent to mention here that there is a distillery, namely, M/s Sir Shadilal Distillery & Chemical Works, located adjacent to the unit of the Respondent No.1 (having

common boundary wall with the unit of the Respondent No.1) and whatsoever discharge /seepage of untreated /partially treated effluent is found in the surrounding drains as well as in the Gram Sabha pond, it comes from the said distillery as there is a common drain for the Respondent No.1 and the said distillery since last several decades. It is further pertinent to mention here that the Applicant has annexed a UPPCB Report dated 09.08.2021 *[annexed as Annexure: A-1, Page No.92 – 95 of the "Response to the Joint Report by the UPPCB and CPCB" filed by the Applicant on 17.08.2021 available on the website of this Hon'ble Tribunal]* and a perusal of the said UPPCB Report dated 09.08.2021 shows that the said distillery was discharging its effluent containing spent wash in the Mansurpur drain via drain located near the molasses tank of the Respondent No.1 during the night time. That a perusal of the said UPPCB Report dated 09.08.2021 further shows that the said distillery after bypassing the ETP, discharges its untreated effluent in the drain located near the molasses tank of the Respondent No.1 and the said drain further meets the Mansurpur drain which finally meets with the Kali River.

d) Recommendation No.4: That the average crush rate of season 2020-21 is 6849 MT/day, which is under the consented capacity.

e) Recommendation No.5: That the Respondent No.1 has already initiated the work to establish an isolated area /spot for the storage of scraps, empty drums of hazardous waste chemicals in the premises as recommended by the Joint Inspection Team and the

said work will be completed before the start of the next crushing season 2021-22.

f) Recommendation No.6: That the Respondent No.1 has an agreement with M/s Bharat Oil and Waste Management Ltd. (BOWML), New Delhi for the disposal of the hazardous and other wastes [verified by the said Joint Inspection Team in Observation No.11 of the Joint Inspection Report dated 09.03.2021]. That the Respondent No.1 is already maintaining the proper record of the hazardous waste, however, the Respondent No.1 undertakes to modify the pattern /format of the said records, if the CPCB and/or UPPCB issues any direction /guideline with respect to the same.

g) Recommendation No.7: That the Respondent No.1 has already initiated the work to install the required flow-meters as recommended by the Joint Inspection Team and the said work will be completed before the start of the next crushing season 2021-22 i.e. by October, 2021.

h) Recommendation No.8: That the Respondent No.1 has instailed ETP of a capacity of 1600 KLPD to treat the industrial effluent of the Respondent No.1 and the said ETP was found working satisfactorily during the inspection conducted on 09.03.2021. That further, the Respondent No.1 has contracted M/s Newcon Consultants and Laboratories, Ghaziabad [recognized /accredited by the UPPCB] for the purposes of analyzing the treated effluent of the Respondent No.1 on a regular basis. That the said M/s Newcon Consultants and Laboratories, Ghaziabad has themselves drawn the samples from

the ETP of the Respondent No.1 and parameters of the said samples were found to be within the prescribed standards /norms. That further all the equipment of the ETP of the Respondent No.1 i.e. Bar Screen Chamber, Oil & Grease Trap, Chemical Mixing Tank, Equalization Tank, Primary Clarifier, Aeration Tank, Secondary Clarifier, Sludge Drying Beds, Sludge Filter Press and Seepage Proof Lagoon for treated water of 10,000 m^3 capacity are in operational condition. That, moreover, the Respondent No.1 has also installed the territory treatment units i.e. dual media filter and activated carbon filter to meet out the treated water norms as per the standards laid down the statutory authorities. That further, the Respondent No.1 is also upgrading its system for more recycling of treated effluent and to reduce the effluent generation, which will be completed before the start of the next crushing season 2021-22 i.e. by October, 2021. Copies of the Stack Emission Monitoring Reports dated 15.05.2021 and Effluent Water Reports dated 17.05.2021 (both after & before treatment) issued by the M/s Newcon Consultants and Laboratories, Ghaziabad are collectively annexed as **Annexure: R1/F (Colly)**.

i) Recommendation No.9: That the Respondent No.1 has contracted M/s Newcon Consultants and Laboratories, Ghaziabad [recognized /accredited by the UPPCB] for the purposes of analyzing the noise levels in the premises of the Respondent No.1. That the said M/s Newcon Consultants and Laboratories, Ghaziabad has monitored the noise levels in the premises of the Respondent No.1 and found

to be withing the prescribed standards. Copies of the Noise Monitoring Reports dated 27.03.2021 issued by the M/s Newcon Consultants and Laboratories, Ghaziabad are collectively annexed as **Annexure: R1/G (Colly)**.

11. That on 17.08.2021, the Applicant has filed a Response to the aforesaid Joint Inspection Report dated 09.03.2021 [filed on 29.06.2021 before this Hon'ble Tribunal]. That the Reply to the submissions /objections to the Report made /raised by the Applicant in its aforesaid Response dated 17.08.2021 is as under:

a) Reply to Para Nos.3 (i) & 3 (ii) of the aforesaid Response dated 17.08.2021 filed by the Applicant: It is submitted that the Table – 1 of the said Joint Inspection Report dated 09.03.2021 contains the analysis report of the samples collected from various drains and the Gram Sabha pond. It is further submitted that the Respondent No.1 does not discharge its effluent in any of the said drains or the Gram Sabha pond and whatsoever effluent is generated by the Respondent No.1, the said effluent is used for irrigation purposes as per the norms. It is further submitted that whatsoever discharge /seepage of untreated /partially treated effluent was found in the surrounding drains as well as in the Gram Sabha pond, it comes from the said M/s Sir Shadilal Distillery & Chemical Works as there is a common drain for the Respondent No.1 and the said distillery since last several decades. It is further submitted that this fact is also verified from the UPPCB Report dated 09.08.2021 *[annexed*

as Annexure: A-1, Page No.92 – 95 of the "Response to the Joint Report by the UPPCB and CPCB" filed by the Applicant on 17.08.2021 available on the website of this Hon'ble Tribunal] wherein it is clearly mentioned that the said distillery regularly discharges its effluent containing spent wash in the Mansurpur drain via drain located near the molasses tank of the Respondent No.1 during the night time. It is further submitted that a perusal of the said UPPCB Report dated 09.08.2021 further shows that the said distillery after bypassing the ETP, discharges its untreated effluent in the drain located near the molasses tank of the Respondent No.1 and the said drain further meets the Mansurpur drain which finally meets with the Kali River. It is further submitted that the parameter of various samples collected by the Joint Inspection Team during the joint inspection conducted on 09.03.2021 relating to the Respondent No.1 *[as reflected from the Table – 3, Table – 7 and Table – 8 of the said Joint Inspection Report dated 09.03.2021]* are within the notified standards /norms.

b) <u>Reply to Para No.3 (iii) of the aforesaid Response dated 17.08.2021 filed by the Applicant</u>: It is submitted that the Respondent No.1 has installed a Sewage Treatment Plant (STP) having capacity of 120 KLPD for the treatment of the domestic waste generated from its residential colony. It is submitted that the said drains are used to carry domestic waste water and waste water from the general toilets used by the farmers. It is further submitted that the Respondent

No.1 does not discharge its effluent in any of the said drains or the Gram Sabha pond and whatsoever effluent is generated by the Respondent No.1, the said effluent is used for irrigation purposes as per the norms. It is further submitted that the contents of the foregoing Para No.11 (a) of this present Reply /Submissions are hereby reiterated and the same are not repeated herein for the sake of brevity.

c) Reply to Para No.3 (iv) to 3 (vi) of the aforesaid Response dated 17.08.2021 filed by the Applicant: It is submitted that the Applicant in Para No.(iv) [Page No.88] of its aforesaid Response dated 17.08.2021 has himself referred to the aforesaid UPPCB Report dated 09.08.2021 [annexed as Annexure: A-1 therein] and has duly mentioned that ***"the report says that effluent containing spentwash is discharged in the drain near Molasses tanks of DSM Sugar Mills Mansurpur Campus by Sir Shadilal Distillery & Chemical Works Pvt. Ltd. The drain near Molasses tanks of DSM Sugar Mills ultimately leads to Mansurpur Drain"***. It is further submitted that this shows that the Applicant very well knows about the aforesaid fact, as mentioned in the said UPPCB Report dated 09.08.2021, that the said effluent containing spentwash was discharged by the said distillery i.e. Sir Shadilal Distillery & Chemical Works Pvt. Ltd. in the drain near the molasses tank of the Respondent No.1. It is further submitted that, however, later in Para No.(v) [Page No.88 – 89] of its aforesaid Response dated

17.08.2021, the Applicant knowingly and with ulterior motives has tried to shift the onus of the said illegal act of discharging effluent containing spentwash committed by the said distillery i.e. Sir Shadilal Distillery & Chemical Works Pvt. Ltd. on to the Respondent No.1 and stated that *"it is submitted that the inspection team has observed the drain near bagasse storage area carrying dark coloured effluent and the analysis result of sample collected are much higher which clearly shows that the unit has failed to comply with the notified standards and causing progressive environment degradation"*.

It is further submitted that the Applicant in the starting of Para No.(iv) [Page No.88] of its aforesaid Response dated 17.08.2021 has stated *".... after receiving complaints from the local people, the UPPCB once again conducted an inspection on 8.8.2021."* It is further submitted that the Applicant deliberately and with ulterior motives has failed to mention the subject-matter of the said complaints made by the local people. It is further submitted that a perusal of the said UPPCB Report dated 09.08.2021 [Page No.93 of the aforesaid Response dated 17.08.2021 filed by the Applicant] shows that the local people has made a complaint regarding the *"discharge of polluted effluent in the Mansurpur drain by the said distillery i.e. Sir Shadilal Distillery & Chemical Works Pvt. Ltd"*.

It is pertinent to mention here that after receiving the said Complaints by the local people, the UPPCB has inspected the said drains i.e. (i) drain near the molasses tank of the Respondent No.1

and (ii) Mansurpur drain situated on NH-58 on 08.08.2021, which is off season for a sugar industry and therefore, at the time of the said inspection on 08.08.2021 the industrial unit of the Respondent No.1 was found closed by the officials of the UPPCB and this fact is also mentioned in the said UPPCB Report dated 09.08.2021 [Page No.93 of the aforesaid Response dated 17.08.2021 filed by the Applicant]. It is submitted that since the industrial unit of the Respondent No.1 was closed during the inspection of the said drains held on 08.08.2021 by the officials of the UPPCB, therefore, there is no question of any effluent generated and/or discharged by the Respondent No.1 into the said drains and/or any drain on 08.08.2021. It is submitted that since due to the off-season, the industrial unit of the Respondent No.1 was closed during the inspection of the said drains held on 08.08.2021 by the officials of the UPPCB and since there was no effluent generation/discharge by the Respondent No.1 at that time, therefore, the presence of any "dark colored effluent" and/or high COD & TSS values of the samples collected from the said drains on 08.08.2021 cannot be attributable to the Respondent No.1.

It is further pertinent to mention here that the said UPPCB Report dated 09.08.2021 contains (i) analysis result of sample taken from the drain near molasses tanks of the Respondent No.1 [Page No.93 of the aforesaid Response dated 17.08.2021 filed by the Applicant] which shows COD (mg/l) – 28700 and TSS (mg/l) – 14600 and (ii) analysis result of sample taken from the Mansupur

drain near NH-58 [Page No.94 of the aforesaid Response dated 17.08.2021 filed by the Applicant] which shows COD (mg/l) – 18400 and TSS (mg/l) – 9300. It is submitted that the said parameters even of the "ETP Inlet" as shown in the Table – 3 of the Joint Inspection Report dated 09.03.2021 are COD – 3798 & TSS – 386. It is further submitted that, therefore, even if assuming but not admitting that the Respondent No.1 has discharged its effluent into the said drains, the said parameters cannot reach to such a high level by any such discharge by the Respondent No.1.

It is further submitted that the Applicant in Para No.(vi) [Page No.89] of its aforesaid Response dated 17.08.2021 has once again tried to create a false narrative against the Respondent No.1. It is further submitted that the Applicant in the said Para No.(vi) has annexed a "Google Earth Map" and stated that *"copy of the google earth map showing transport of industrial effluent into the Gram Sabha Pond as well as the absence of any transport of domestic sewage to the Gram Sabha Pond"*. It is further submitted that a perusal of the said "Google Earth Map" annexed as Annexure: A-2 [Page No.96 of the aforesaid Response dated 17.08.2021 filed by the Applicant] shows "Gram Sabha Pond" and "STP Facility". It is further submitted that although from the said "Google Earth Map" it is not clear that whether the said "STP Facility" is of the Respondent No.1 or of the said distillery i.e. M/s Sir Shadilal Distillery & Chemical Works, however, in any case an "STP Facility" discharges treated "domestic sewage" and not "industrial effluent", which is in

contradiction to the allegations made by the Applicant in para under Reply.

d) Reply to Para No.3 (vii) of the aforesaid Response dated 17.08.2021 filed by the Applicant: It is submitted that the Respondent No.1 has an agreement with M/s Bharat Oil and Waste Management Ltd. (BOWML), New Delhi for the disposal of the hazardous and other wastes [verified by the said Joint Inspection Team in Observation No.11 of the Joint Inspection Report dated 09.03.2021]. It is further submitted that the Respondent No.1 has already initiated the work to establish an isolated area /spot for the storage of scraps, empty drums of hazardous waste chemicals in the premises as recommended by the Joint Inspection Team and the said work will be completed before the start of the next crushing season 2021-22.

e) Reply to Para No.3 (viii) of the aforesaid Response dated 17.08.2021 filed by the Applicant: It is submitted that the Respondent No.1 has already initiated the work to install the required flow-meters as recommended by the Joint Inspection Team and the said work will be completed before the start of the next crushing season 2021-22 i.e. by October, 2021. It is further submitted that the Table – 1 of the said Joint Inspection Report dated 09.03.2021 contains the analysis report of the samples collected from various drains and the Gram Sabha pond. It is further

submitted that the Respondent No.1 does not discharge its effluent in any of the said drains or the Gram Sabha pond and whatsoever effluent is generated by the Respondent No.1, the said effluent is used for irrigation purposes as per the norms. It is further submitted that whatsoever discharge /seepage of untreated /partially treated effluent was found in the surrounding drains as well as in the Gram Sabha pond, it comes from the said M/s Sir Shadilal Distillery & Chemical Works as there is a common drain for the Respondent No.1 and the said distillery since last several decades. It is further submitted that this fact is also verified from the aforesaid UPPCB Report dated 09.08.2021 wherein it is clearly mentioned that the said distillery was found discharging its effluent containing spent wash in the Mansurpur drain via drain located near the molasses tank of the Respondent No.1 during the night time. It is further submitted that a perusal of the said UPPCB Report dated 09.08.2021 further shows that the said distillery after bypassing the ETP, discharges its untreated effluent in the drain located near the molasses tank of the Respondent No.1 and the said drain further meets the Mansurpur drain which finally meets with the Kali River. It is further submitted that the parameter of various samples collected by the Joint Inspection Team during the joint inspection conducted on 09.03.2021 relating to the Respondent No.1 *[as reflected from the Table – 3, Table – 7 and Table – 8 of the said Joint Inspection Report dated 09.03.2021]* are within the notified standards /norms.

It is further submitted that, however, the Applicant deliberately and with ulterior motives in the said Para No.(viii) has once again tried to create a false narrative against the Respondent No.1. It is further submitted that a perusal of the Photographs annexed as Annexure A-3 [Page No.97 – 99 of the aforesaid Response dated 17.08.2021 filed by the Applicant] shows that the said photographs, except one, was taken by the Applicant on 28.06.2021, which is once again an off-season for a sugar industry and therefore, the industrial unit of the Respondent No.1 was closed as on 28.06.2021. It is further submitted that since the industrial unit of the Respondent No.1 was closed as on 28.06.2021, therefore, there is no question of the generation and/or discharge of the effluent in the said drains by the Respondent No.1. It is further submitted that as a matter of fact, the said photographs once again shows that it is the said distillery i.e. M/s Sir Shadilal Distillery & Chemical Works which regularly discharges its effluent in the said drains, as was also found by the officials of the UPPCB during the inspection held on 08.08.2021 and the Applicant in the para under reply has once again knowingly and with ulterior motives has tried to shift the onus of the said illegal act of discharging treated /untreated effluent in the said drains committed by the said distillery on to the Respondent No.1.

f) Reply to Para No.3 (ix) of the aforesaid Response dated 17.08.2021 filed by the Applicant: It is submitted that the Railway Department is in process to acquire the land on which the said wall is situated for the purpose of development of a freight corridor and, therefore, the Respondent No.1 cannot construct anything on the said land till the acquisition process is finalized by the Railway Department. It is further submitted that once the said acquisition process is finalized by the Railway Department, the Respondent No.1 will erect a proper wall in accordance with the directions of the UPPCB, however, meanwhile the Respondent No.1 has already erected the green net.

g) Reply to Para No.3 (x) of the aforesaid Response dated 17.08.2021 filed by the Applicant: It is submitted that the said Joint Inspection Report dated 09.03.2021 shows that there is no degradation to the environment caused by the Respondent No.1.

h) Reply to Para No.4 of the aforesaid Response dated 17.08.2021 filed by the Applicant: It is submitted that the Applicant in the para under reply knowingly and with ulterior motives has once again tried to shift the onus of the said illegal act of discharging treated /untreated effluent into the said drains committed by the said distillery i.e. M/s Sir Shadilal Distillery & Chemical Works on to the Respondent No.1. It is further submitted that the UPPCB has inspected the said drains i.e. (i) drain near the molasses tank of the Respondent No.1 and (ii) Mansurpur drain situated on NH-58 on 08.08.2021, which is an off

season for a sugar industry and therefore, at the time of the said inspection on 08.08.2021 the industrial unit of the Respondent No.1 was found closed by the officials of the UPPCB. It is submitted that since the industrial unit of the Respondent No.1 was closed during the inspection of the said drains held on 08.08.2021 by the officials of the UPPCB, therefore, there is no question of any effluent generated and/or discharged by the Respondent No.1 into the said drains and/or any drain on 08.08.2021. It is submitted that since due to the off-season, the industrial unit of the Respondent No.1 was closed during the inspection of the said drains held on 08.08.2021 by the officials of the UPPCB and since there was no effluent generation by the Respondent No.1 at that time, therefore, high BOD /COD level of the said drains including the Mansurpur drains cannot be attributable to the Respondent No.1. It is further submitted that the aforesaid fact once again clearly shows that the Respondent No.1 has not caused any environmental degradation by contributing in the deterioration of the health of Kali River, which is a major tributary to the Hindon River as alleged by the Applicant in the para under Reply.

PRAYER:

In the facts and circumstances as stated above, it is therefore, most respectfully prayed that this Hon'ble Tribunal may graciously be pleased to:

(i) dismiss the present Original Application being Original Application No.16 of 2021 titled as *"Vinit Kumar vs. DSM Sugar Mills Ltd. & Ors."* filed by the Applicant;

(ii) Pass such other/further order(s) as this Hon'ble Tribunal may deem fit and proper in the facts & circumstances of the case.

For Dhampur Sugar Mills Ltd.

Authorised Signatory

RESPONDENT NO.1

THROUGH

ANUBHAV ANAND ARON, ABHINAV ANAND
(Advocates for the Respondent No.1)
A-901, Apex Golf Avenue, Sector-1,
Greater Noida (West), U.P. – 201 306
Mob: 9811764256; 9582416270
E-mail: abhinav.legal@gmail.com

Place: NEW DELHI
Date: 19/08/2021

(23)

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

(Original Application No.16 of 2021)

IN THE MATTER OF:

Vinit Kumar ..... **Applicant**

Versus

DSM Sugar Mills Ltd. & Ors. ..... **Respondents**

AFFIDAVIT

I, Amit Sharma aged about 54 years S/o Sh. Jagdeesh Chandra Sharma working as Senior General Manager (Commercial) with *DSM Sugar Mills Ltd* having its Corporate Office at: 241, Okhla Industrial Estate, Phase – III, New Delhi – 110020 (the Respondent No.1 herein) do hereby solemnly state and affirm as under:

1. That I am working as Senior General Manager (Commercial) with *DSM Sugar Mills Ltd* (the Respondent No.1 herein) and has been, vide Board Resolution dated 13.02.2018, duly authorized to sign & verify the accompanying Reply /Submissions, to file the documents, to sign the Vakalatnama and to do all such other act(s) as may be necessary for filling the accompanying Reply /Submissions.
2. That the accompanying Reply /Submissions has been drafted by my Counsel under my instruction and the content of the same have not been repeated herewith for the sake of brevity and the same may kindly be read as part and parcel of the present Affidavit.
3. That I have read and understood the content of the accompanying Reply /Submissions and present Affidavit and the same are true and correct to my knowledge and nothing material has been concealed there from.

Identify By

For DSM Dhampur Sugar Mills Ltd

DEPONENT

Authorised Signatory

Regd. Entry No. 3990
Date 18.8.2021

VERIFICATION

Verified at Delhi on this 18 AUG 2021 day of 2021 that the contents of Para No. 1 to 3 of the above Affidavit are true and correct to my knowledge, and nothing material has been concealed there from.

For DSM Dhampur Sugar Mills Ltd

DEPONENT

Authorised Signatory

GOVT. OF INDIA
D. P. MATHUR
NOTARY
Regd. No. 17814
NCT DELHI

My Commission expires on 22/12/2024

ATTESTED

18/8/2021

NOTARY PUBLIC, DELHI NCR (INDIA)

18 AUG 2021

ANNEXURE: R1/A

(24)

Dhampur Sugar Mills Limited
241, Okhla Industrial Estate, Phase III
New Delhi - 110 020, India
Tel: +91-11-3065 9400, 4161 2456
Tele Fax: +91-11-2693 5697
E-mail: corporateoffice@dhampur.com
Website: www.dhampur.com

CERTIFIED TRUE COPY OF THE RESOLUTION PASSED IN THE FINANCE SUB COMMITTEE MEETING (NO. FEBRUARY -01/2017-18) OF THE DIRECTORS OF DHAMPUR SUGAR MILLS LIMITED HELD ON TUESDAY, 13TH DAY OF FEBRUARY, 2018 AT ITS CORPORATE OFFICE AT 241, OKHLA INDUSTRIAL ESTATE, PHASE –III, NEW DELHI-110020

"**RESOLVED** THAT Mr. Sandeep Sharma, Director, Mr. SK Bhatnagar, President (Corporate), Mr. Mukul Sharma, Chief General Manager (Business Development) , Mr. Amit Sharma, Sr. General Manager (Commercial) of the Company be and are hereby severally authorised to apply for registrations, filing requisite returns, to make applications, communications, representations, and to sign, execute all types of paper(s), agreement(s), document(s), undertaking(s), deed(s), other document(s) on behalf of the Company (including its Units) before the appropriate authorities (including Appellate Tribunals and jurisdictional Courts etc.) for Central Excise Act, Trade Tax Act, VAT Act, U.P. Excise Act and GST Act and any other State Act or Central Act and are authorised to sign Vakalatnama on behalf of the Company, as may be required from time to time for the purpose mentioned above."

Certified True Copy
For Dhampur Sugar Mills Limited

Dhampur Sugar Mills Limited New Delhi

Aparna Goel
Company Secretary
M.No 22787

ANNEXURE : R1/B

(25)

Email : romuzaffarnagar@uppcb.in

दूरभाष : 0131-2436493

क्षेत्रीय कार्यालय

उत्तर प्रदेश प्रदूषण नियंत्रण बोर्ड, मुजफ्फरनगर

U.P. POLLUTION CONTROL BOARD, MUZAFFARNAGAR

6–बी, नई मण्डी, मुजफ्फरनगर–251001 (उ०प्र०)

संदर्भ सं० Ref. No. 214/OA-16/Vinit Kumar V/s. DSM Sugar/2021 दिनांक Dated 24-6-21.

To,

The Registrar
National Green Tribunal
Principal Bench
New Delhi.
E-mail : judicial-ngt@gov.in

Sub.- Compliance to the direction issued on 28.01.2021 by Hon'ble National Green Tribunal in O.A. No. 16/2021 Vinit Kumar Vs. M/s DSM Sugar Mills Ltd. And Ors.

Sir,

With reference to the subject mentioned above kindly find enclosed herewith the Joint Committee Report of CPCB and UPPCB in compliance of the order issued on 28.01.2021 by Hon'ble National Green Tribunal in O.A. No. 16/2021 Vinit Kumar Vs. M/s DSM Sugar Mills Ltd. And Ors.

Encl. : As above.

Yours faithfully

Ankit S

(Ankit Singh)
Regional Officer

Copy to :

1. Member Secretary, U.P. Pollution Control Board, Lucknow for information.
2. Shri Pradeep Mishra, Advocate, Hon'ble Supreme Court/NGT, New Delhi for perusal and necessary action.
3. Chief Law Officer, U.P. Pollution Control Board, Lucknow for information.
4. Chief Environmental Officer (Circle-3), U.P. Pollution Control Board, Lucknow for information.

Ankit S.
Regional Officer

(26)

Joint Inspection Report

(09.03.2021)

of

M/s DSM Sugar Mansurpur, (A unit of Dhampur Sugar Mills Ltd.), P.O.- Mansurpur, District-Muzaffarnagar- 251203, Uttar Pradesh

In the Matter Of

Vinit Kumar Vs M/s DSM Sugar Mills Ltd. And Ors.

In O.A. No. 16/2021

-Prepared by-

The Joint Committee of CPCB & UPPCB

Constituted by

Hon'ble National Green Tribunal

(Order dated 28th January, 2021)

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(29)

JOINT INSPECTION REPORT OF DSM SUGAR MANSURPUR, (A UNIT OF DHAMPUR SUGAR MILLS LTD.), P.O.- MANSURPUR, DISTRICT- MUZAFFARNAGAR- 251203, U.P. ON 09.03.2021 IN COMPLIANCE TO DIRECTION ISSUED BY HON'BLE NATIONAL GREEN TRIBUNAL IN O.A. NO. 16/2021, IN THE MATTER OF VINIT KUMAR VS M/S DSM SUGAR MILLS LTD. AND ORS. - REG.

1.0 Background

Hon'ble NGT vide order dated 23.01.2021 in the matter of Vinit Kumar Vs M/s DSM Sugar Mills Ltd. And Ors. in O.A. No. 16/2021 had directed following:

".. let a joint Committee of the CPCB and the State PCB ascertain facts and take such as may be called for in exercise of their statutory powers., following due process and furnish a factual and action taken report in the matter within two months by e-mail at judicial-ngt@gov.in preferably in the form of searchable PDF/OCR support PDF. The state PCB will be the nodal agency for coordination and compliance".

2.0 Inspection of M/s DSM Sugar, Mansurpur (A unit of Dhampur Sugar Mills Pvt. Ltd.), P.O- Mansurpur, District- Muzaffarnagar U.P. on 09.03.2021 by Joint team of officials from CPCB and Regional Office, UPPCB, Muzaffarnagar.

In compliance to the aforesaid direction, a joint team of officials from Central Pollution Control Board, Delhi and Regional Office, Muzaffarnagar, Uttar Pradesh Pollution Control Board (UPPCB) visited the unit M/s DSM Sugar, Mansurpur (A unit of Dhampur Sugar Mills Pvt. Ltd.), P.O- Mansurpur, District- Muzaffarnagar U.P. ("hereafter referred as the Unit") premise and surveyed the drain along the boundary wall of sugar mill near railway track till the interior locations as well as Gram Sabha Pond and along the NH-58 to trace any bypass, effluent discharge point in the drain on 09.03.2021.

- During inspection, the team found a drain inside the unit near bagasse storage area, which contains black colored waste water. The samples were collected for further physico-chemical analysis **(Pic-22)**. Sample analysis result is at Table- 1.
- The team has surveyed the boundary of the unit up to the interior locations up to a nearby distillery unit. During survey, a drain of waste water was observed behind the unit, near railway track along the boundary of the unit **(Pic-2)**. Few outlets were also found opened towards the drain **(Pic-31)**. The sample were collected by the team for physico-chemical analysis. Sample analysis result is at Table- 1.
- The team followed the drain flowing towards backside of the ETP towards Gram Sabha Pond and samples were collected from the Pond for the analysis **(Pic-32)**. Further this drain meets the Mansurpur drain at NH 58 at downstream location of the unit, where the sewage from Mansurpur area also combines. The samples

for analysis were collected by the team from Mansurpur drain at NH 58 at downstream location **(Pic-1)**.

- The joint team tried to survey the Mansurpur drain at NH 58 up to the confluence of River Kali west, however due to unapproachability to the confluence point, the sample was also collected 1 km before the point **(Pic-33)**.

2.1 The analysis results of the drain samples collected from various locations are shown in Table1.

Table 1. Analysis results of samples collected from Drain inside unit near bagasse storage, Drain behind unit near railway track, Downstream of Mansurpur drain, Drain near Kali River and Gram Sabha Pond After ETP.

Parameters, mg/l except pH, Color in Hazen and Conductivity in µmho/cm							
Sample Analysis	**pH**	**COD**	**BOD**	**TSS**	**TDS**	**Phosphate**	**Ammonia**
Drain located within unit's premises near bagasse storage	**7.0**	**1357**	**563**	**222**	**3744**	5.37	-
Drain behind unit near railway track	7.3	737	307	92	3964	3.65	-
Gram Sabha Pond After ETP	**5.4**	**1110**	**597**	**205**	**1708**	1.45	2.3
Downstream of Mansurpur drain at NH-58	**6.0**	**1210**	**571**	**382**	**1376**	2.36	14
Drain near Kali River	7.2	704	254	420	1232	2.82	29
Notified standards for land disposal	**5.5 to 8.5**	**250**	**100**	**100**	**2100**	-	-

The above analysis results of the drain samples collected from various locations depict the following:

- The analysis results of the ***Gram Sabha pond*** show pH= 5.4, COD= 1110 mg/l, BOD= 597 mg/l, TSS= 205 mg/l, TDS= 1708 mg/l and Ammonia= 2.3 mg/l which indicates th characteristics of untreated/partially treated effluent and the presence of ammonia indicates presence of domestic sewage.

- The analysis results of the ***Downstream of Mansurpur drain at NH-58*** show pH= 6.0, COD= 1210 mg/l, BOD= 571 mg/l, TSS= 382 mg/l, TDS= 1376 mg/l and Ammonia= 14 mg/l which indicates the characteristics of untreated/partially treated industrial effluent mixed with domestic sewage.
- The analysis results of the ***Drain near Kali River*** show pH= 7.2, COD= 704 mg/l, BOD= 254 mg/l, TSS= 420 mg/l, TDS= 1232 mg/l and Ammonia= 29 mg/l which indicates the characteristics of domestic sewage.

3.0 INSPECTION REPORT OF M/S DSM SUGAR MANSURPUR, (A UNIT OF DHAMPUR SUGAR MILLS LTD.), P.O.- MANSURPUR, DISTRICT- MUZAFFARNAGAR- 251203, U.P.

A. GENERAL INFORMATION

1.	**Date of Inspection:**	**09.03.2021**	
2.	**Name of the unit with complete postal address**	M/s DSM Sugar, Mansurpur (A unit of Dhampur Sugar Mills Pvt. Ltd.), P.O.- Mansurpur, District- Muzaffarnagar-251203, Uttar Pradseh	
3.	**Spatial Co-ordinates Latitude and longitude (in Decimal format only)**	29.350839 77.718140	
4.	**Standalone/ integrated (with co-generation) Sugar/ sugar refinery**	Sugar Refinery	
5.	**Year of commissioning**	1988	
6.	**License capacity of sugar Mill (TCD)**	7000 TCD	
7.	**Average actual crush rate (TCD)**	7196 TCD (Avg. value as per Form RT7(C) for the month of Oct-20, Nov-20, Dec-20, Jan-21, Feb-21 and Daily Manufacturing Report (DMR) for the month of Mar-21)	
8.	**Consent status& its Validity with date** (Expired/ Applied for renewal/ First time applied/ Never applied) a. Air Consent b. Water consent c. Hazardous Waste Authorization	Air Consent valid up to 31.12.2024 **(Annexure-I)** Water consent valid up to 31.12.2024 **(Annexure-II)** Hazardous Waste Authorization valid up to 19.02.2022 **(Annexure-III)**	
9.	**NOC from CGWA & its Validity with date** (Expired/ Applied for renewal/ First time applied/ Never applied)	CGWA NOC Expired on 07.06.2020 Applied for renewal on 16.04.2020 **(Annexure-IV)**	
10.	**Start period of crushing season 2020-21**	29.10.2020	
11.	**Operational status during visit (operational/ closed/ temporary closed/ permanent closed)**	Operational	
12.	**Name of contact person**	**Designation**	**Contact No & E- mail**

	Sh. Arvind Kumar Dixit	Unit Head	Contact No- 9837894078
	Sh. Pawan Kumar Sharma	AGM-Admin	Contact No- 9837894102
	Sh. Prabhat Kumar	ETP Incharge	Contact No- 9528028506 Email-prabhatkumar@dhampur.com

B. OPERATIONAL STATUS

S.No.	Particulars	
1.	**Sources of fresh water**	
	a. Bore well	Bore well- 03 (one was operational, 02 was standby) 1. Bore well-I= Flow=0.0 m^3/hr Σ=192648.9 m^3 2. Bore well-II= Flow=0.0 m^3/hr Σ=290223 m^3 3. Bore well-III= Flow=103.1 m^3/hr Σ=35989.9 m^3
	b. Flow meter Installation at wells	Yes
	c. Reading of Flow Meter during visit	Yes
	d. Any Logbook maintained	Yes
	e. Quantity of water withdrawal(KLD)	See nested table below
2.	**Fresh water consumption (KLD)**	
	a. Sugar plant b. co-generation c. Residential etc.	1637 KLD (As per logbook data from 1st Feb-21 to 9th Mar-21)
	d. Total fresh water Consumption (m^3/hr)	1637 KLD (As per logbook data from 1st Feb-21 to 9th Mar-21)
	e. Log book maintained (Yes/ No) If any, details to be collected	Yes
3.	**Details of Hot & Cold water recycling system**	**Number** / **Capacity**

Bore-well No.	Month wise fresh water abstraction (KLD) (As per logbook data from 1st Feb-21 to 9th Mar-21)		
	Feb-21	Mar-21	Total Average (KLD)
Bore-well- I	0	0	0
Bore-well- II	738	559	1297
Bore-well- III	236	104	340
Total	974	663	1637

	(Yes/No.)		
	a. Details of Hot water UGR.	01	225 m^3
	b. Cold water UGR and cooling towers	01	150 m^3
	c. **Hot water-** Location of flow meter & its Installation **(Yes/No)**	**Flow meter (Yes/No)**	**Flow meter reading**
	1. Imbibition water at mills	Yes	Flow=156.70 m^3/hr Σ=2420853.09 m^3
	2. Filter cake wash water at rotary vacuum filter	Yes	Flow=12.17 m^3/hr Σ=81781.2 m^3
	3. Wash water at Centrifugal	Yes	Flow=8.211 m^3/hr Σ=41851.0 m^3
	d. **Cold water** -Location of flow meter & its Installation.		
	1. Power turbine cooling	Yes	Flow=2.07 m^3/hr Σ=27878.16 m^3
	2. Mills, fibrizer bearing, pumps cooling	Recycle	
	3. Cooling tower of co-generation	Yes	Σ=27930.0 m^3
	4. B and C massecuite cooling	Recycle	Flow=11.91 m^3/hr Σ=38220.0 m^3
	5. Final molasses cooling	Recycle	
	6. Make water for shortfall at any point operation including spray pond/process cooling tower.	Flow meter purchased & under installation	
	7. Cleaning and human requirements including lab requirements	Yes	
4.	**Waste water (effluent generation (KLD)**		
	a. Cooling tower over flow	Effluent generation as per log book from 1st Feb-2021 to 9th Mar-2021): Cooling tower over flow= **263.32 KLD** Mills house= **43.51 KLD,** Boiling house (Refinery effluent generation-580.95+EVP body cleaning)- 124.68 KLD= **705.62 KLD**	
	b. Mills, boiling house, D.M./ R.O. Plant boilers etc.		
	c. Co-generation		

		Co-gen Cooling Tower= **38.22 KLD**	
	d. IER wash water generation.	Flow=8.6 m^3/hr= **206.88 KLD** Σ=265921.2 m^3	
	e. Brine solution reject after regeneration (for refine sugar)	Brine solution reject transferred to Brine Recovery System, which is 90% recovered and 10% Brine solution reject is being used to spray on Bagasse.	
	f. Brine reject from brine recovery system		
	h. Common / total effluent generation	**1257.55 KLD**	
5.	**Waste water effluent generation, Liter/ton of cane**	**174.75 Liter/ton**	
6.	**Details of Flow meters**	**Flow meter (Yes/No)**	**Quantity of water (KLD)**
	a. Outlet of mill house and boiling house.	Yes Mills house: Flow=2.1 m^3/hr= Σ=1153797 m^3 Boiling house Flow=1.2 m^3/hr= Σ=71211.1 m^3	Mills house= 43.51 KLD, Boiling house = 705.62 KLD (As per log book from 1st Feb-2021 to 9th Mar-2021)
	b. Outlet of cooling tower over flow	Yes, Flow=11.5 m^3/hr Σ=18616.5 m^3	Cooling tower over flow= 263.32 KLD (As per log book from 1st Feb-2021 to 9th Mar-2021)
	c. At ETP outlet	Yes, Flow=40.8 m^3/hr Σ=0.0 m^3	**1208.38 KLD** (As per log book from 17th Feb-2021 to 9th Mar-2021)
	d. At ETP Inlet	Yes, Flow=29.97 m^3/hr Σ=547719 m^3	**1257.55 KLD** (As (As per log book from 1st Feb-2021 to 9th Mar-2021)
	e. Other places of effluent generation	No	
7.	**Details of tube cleaning method adopted (chemical/ hydrojet/ any other appropriate method if any), provide details**	Yes Chemical- Caustic Soda	

8.	**Availability of Hazardous tank to collect wash water generated during chemical/Mechanical cleaning of evaporator tubes. (Yes/No), if Yes give Details.**	Yes, 02 nos. hazardous tank of capacity 37m^3 each	
9.	**Total waste water (effluent) generation, (Liters/ton of cane)**	**174.75 Liter/ton**	
10.	**Condensate polishing system adopted by the factory (for boilers >45 kg/cm^2 steam pressure)**	Under construction	
	If yes, then provide the details of condensate polishing system	Capacity-22 m^3/hrs	
11.	**Construction of small pits with smooth inner surface with ceramic tiles near to boiler feed pumps, condensate pumps, Injection pumps and RVF vacuum to collect gland cooling water**	No leakage from pumps, Recycled to cooling tower mechanically.	
12.	**Aeration in equalization tank**	Yes, (Dimension of AT)-49mx12mx4.5m) No. of diffuser- 440	
13.	**Type of aeration in aeration tank Diffused/ surface/ any other**	Diffused aeration	
14.	**Tertiary treatment, give details**	Yes, Activated Carbon Filter (ACF) & Dual Media Filter (DMF) - 9.81 m^3 each	
15.	**Schematic diagram of ETP**	Oil skimmer & Bar screen chamber → Receiving tank→ Oil & Grease trap→ Chemical mixing tank→ Equalization tank → Primary Clarifier → Aeration tank → Secondary Clarifier→ Dual media filter→ Activated Carbon Filter→ Polishing tank→ Lagoon	
16.	**Treatment capacity of ETP (KLD)**	840 KLD	
17.	**Retention time (Min/hr)**	**Retention Time/Contact Time (Mentioned in CPCB charter)**	**As per Industry**
	1. Bar screen Chamber	30 minutes	36 minutes
	2. Oil & grease tank	45 minutes	37 minutes
	3. Equalization tank with aeration	6 hrs	12 hrs 30 minutes
	4. Primary Clarifier	5-6 hrs	7 hrs 18 minutes
	5. Aeration tank	24-28 hrs	30 hrs 18

			minutes
	6. Secondary Clarifier	7-8 hrs	7 hrs 18 minutes
	7. Multi grade filter	20-25 minutes	1 hr 10 minutes
	8. Activated carbon filter	20-25 minutes	1 hr 10 minutes
	9. Sludge drying bed	Not <0.03 m^3 per ton of cane	170 m^3
	10. Centrifuge	-	
18.	**Any further treatment after ETP**	No	
19.	**Brief processing details (flow chart)**	Yes, attached as **Annexure-V**	
20.	**Number of Piezometeric wells available in the unit premises: 2** (latitude – 29.030003, Longitude – 78.990248, water level reading – 9.95 m at 24.58°C)		
21.	**Storage of treated Effluent**		
	a. No. & size of lagoons	No. of lagoon= 01, Size= 10000 m^3	
	b. Retention time	15 days as per sugar charter	
	c. Lagoon type- permeable/impermeable	Impermeable	
22.	**Sludge Handling Process: Yes**		
	a. Sludge Drying Process	Four sludge drying bed available for drying process	
	b. Final Disposal of Sludge	Sludge after drying mixed with fly ash & press mud to form bio-manure & distributed free of cost to sugar cane growers	
	d. Whether mechanical sludge handling system installed	Filter press installed	
23.	**Any Hazardous Substances (Yes/No), if yes, give details. (Quantity & way of Disposal)**	Yes, Way of Disposal- used/ spent oil or wastes/ residues containing oil mixed with bagasse & burnt in boiler Quantity- 1.04 kg/day **(Avg. quantity from 1st Nov-20 to 9th Mar-21)**	
24.	**Manpower employed for ETP operation & maintenance.**	10 (01 Manager, 01 Sr. Officer, 01 Chemist, 03 Operator, 04 Helper)	

25.	**Details of irrigation system & treated effluent used quantity**	The unit facilitated pipeline around the boundary wall of ETP for irrigation to nearby farmers' fields.
	1. Own land area for irrigation (Yes/No),	Yes, 36 acre
	2. Farmer land area and their agreement. (Yes/No),	Yes, Farmer's agreement provided
	3. Net effluent generation left for Irrigation (KLD)	Treated water storage lagoon (10000 m^3) having 15 days water holding capacity
	4. Flow meter to measure amount of water used for irrigation.	Not installed
	5. Distance of land Area from the Unit (Km)	01 Km
	6. Total Available Area (Hectare)	190 hectare
	7. Soil Texture of land (Sandy, Sandy loam, Loam, Clay loam, Clay)	Sandy loam
	8. Crop area under effluent application	190 hectare (30 hectare-Rabi crop and 160 hectare- Sugarcane)
26.	**Color coding of pipelines for water distribution network**	Yes Wastewater Tank – Yellow Treated Water Tank – Green MGF & ACF – Blue Freshwater/Recycled/ Cooling Tower – Blue
27.	**Mode of disposal (route to reach Ganga)**	Land disposal for irrigation to nearby farmers' fields through pipeline

4.0 OBSERVATIONS

1. The unit M/s Dhampur Sugar Mills Limited, Mansurpur, Muzzafarnagar, U.P. situated on N.H. – 58 in between Meerut & Muzaffarnagar, which was engaged in producing refined sugar by Defco Remelt Phospho Flotation process.
2. The unit is a refinery sugar unit and SO2 gas cooling is not required, hence provision of separate Sulfur Recovery System (SRS) is not required.
3. The unit has installed Ion Exchange technology for decoloring sugar syrups. The Ion Exchange resin gets saturated/ exhausted after some usage and has to be regenerated. After the resin gets exhausted, the unit has re-generated resin using caustic brine solutions. As per the unit representative, 90% of Brine solution reject is recovered and rest 10% is being used to spray on Bagasse, however the same is not observed by the team on the day of inspection. The unit prepare fresh brine solution for every cycle in Ion Exchange Column (IER).

The team also observed a drain near bagasse storage area carrying dark colored effluent. Analysis result of sample collected from the drain shows pH= 7.0. COD= 1357 mg/l, BOD= 563 mg/l, TSS= 222 mg/l, TDS= 3744 mg/l. (Sample analysis result is at Table-1).

4. The unit was found operational with capacity of 7000 TCD and the ETP was also operational at the time of inspection.
5. The unit has 33 MW cogeneration power plant. The unit is having 02 Boilers of capacity 100 TPH & 90 TPH.
6. The unit has started its crushing season 2020-21 on 22nd October, 2020.
7. As per Daily Manufacturing Reports (DMRs) provided by the unit, it was observed that on the average actual crush rate (TCD) is 7196 TCD (Avg. value as per Form RT7(C) for the month of Oct-20, Nov-20, Dec-20, Jan-21, Feb-21 and Daily Manufacturing Report (DMR) for the month of Mar-21).
8. Unit is having valid Consent to Operate under section 21/22 of the Air (Prevention & Control of Pollution) Act, 1981 (as amended) and Water under section 25/26 (Prevention & Control of Pollution) Act, 1974 (as amended) for discharge, both valid up to **31/12/2024**.
9. The unit is also having valid Authorization under the provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 for storage and disposal of hazardous wastes valid up to **19.02.2022**.
10. The unit has provided log book for the generation of used oil, which is being mixed with bagasse and bunt in boiler. The average generated quantity of used oil is 1.04 kg/day, which comply the authorized quantity i.e. 5.0 kg/day. Following is the details of the hazardous waste generation by the unit:

Table 2. Details of the hazardous waste generation (used oil) by the unit (Avg. quantity from 1st Nov-20 to 9th Mar-21):

S.No.	Category of Hazardous Waste as per the Schedules I, II & III of these rules	Authorized mode of disposal or recycling or utilization or co-processing etc.	Quantity as per Authorization	Quantity generated
1	5.1 (used or spent oil)	Mixed with bagasse & burnt in boiler	5.0 kg/day	1.04 kg/day
2	5.2 (wastes or residues containing oil)			

11. The unit has not provided isolated area/spot for storage of scraps, empty drums of hazardous waste chemicals in the premises which was uncovered and not fenced, which is violation of the Authorization, however the location for storage of hazardous waste chemicals was made near to the bagasse storage area. As informed the unit is giving scraps and Hazardous wastes to third party (Bharat Oil & Waste Management Ltd.) for its disposal on

quarterly basis. The unit has also provided membership certificate with Bharat Oil & Waste Management Ltd (Membership No BOWML/K/3637/19) having expiry date of 10th December, 2021.

12. The unit is having ETP with treatment capacity of 840 KLD for treatment of effluent generated from various sections of sugar mill.
13. The ETP comprises of Oil skimmer & Bar screen chamber → Receiving tank→ Oil & Grease trap→ Chemical mixing tank→ Equalization tank → Primary Clarifier → Aeration tank → Secondary Clarifier→ Dual media filter→ Activated Carbon Filter→ Polishing tank→ Lagoon.
14. The unit has installed flow-meter at main inlet channel (Flow- 29.97m3/hr, Totalizer 547719 m3) and outlet of ETP (Flow- 40.8 m3/hr, Totalizer 0.0 m3).
15. The unit is complying w.r.t. final treated effluent discharge volume norms as the treated effluent generation i.e. 174.752 Liter/ton of cane crushed as against norms of 200 Liter/ton of cane crushed.
16. The team has collected effluent samples from ETP inlet, outlet & various units of ETP and treated effluent storage lagoon including outlet of irrigation pipeline as well as Gram Sabha pond. The analysis result is placed in Table 3 below.

Table 3. Samples were collected from inlet, outlet & various units of ETP and treated effluent storage lagoon including outlet of irrigation pipeline as well as Gram Sabha pond.

Parameters, mg/l except pH, Color in Hazen and Conductivity in µmho/cm										
Sample Analysis	**Effluent flow rate (m^3/hr)**	**pH**	**COD**	**BOD**	**TSS**	**TDS**	**Phosphate**	**Ammonia**	**Oil & Grease**	**MLSS/ MLVSS**
ETP Inlet	29.97	6.7	3798	1432	386	4776	2.96	10	BDL	-
Primary clarifier	-	10.9	1741	985	163	2444	0.05	-	-	-
ETP Aeration tank	-	-	-	-	-	-	-	-	-	MLSS= 1208 MLVSS =1236
Secondary clarifier	-	7.3	392	106	251	760	0.06	-	-	-
ETP Outlet (After tertiary treatment)	40.8	7.4	105	36	62	268	0.05	1.1	BDL	-
Lagoon	-	8.0	35	7.6	22	812	0.33	-	-	-

Irrigation Pipeline	-	7.6	54	14	32	748	0.09	-	-	-
Cooling tower overflow	-	7.0	879	418	336	976	0.09	0.6	-	-
Values of OCEMS at 11:00 AM on 09.03.2021	-	7.0	102.2	15.77	13.95	-	-	-	-	-
Notified standards for land disposal	-	**5.5 to 8.5**	**250**	**100**	**100**	**2100**	-	-	**10**	-

17. The analysis results of sample collected from the ETP outlet (pH- 7.4, COD- 105 mg/l, BOD- 36 mg/l, TSS- 62 mg/l, TDS- 268 mg/l), indicates that the treated effluent from the ETP, is complying w.r.t. the notified standards for irrigation purpose i.e. pH- 5.5-8.5, COD- 250 mg/l, BOD- 100 mg/l, TSS- 100 mg/l, TDS- 2100 mg/l).
18. The unit has impervious lagoon having capacity of 10,000 m3 to store treated effluent. The treated water is pumped for irrigation to nearby farmer's field as per the demand through pipeline. The network of irrigation pipeline was observed around the boundary of ETP unit. The analysis results of sample collected from Lagoon (pH- 8.0, COD- 35 mg/l, BOD-7.6 mg/l, TSS- 22 mg/l, TDS- 812 mg/l) and Irrigation pipeline (pH- 7.0, COD- 54 mg/l, BOD-14 mg/l, TSS- 32 mg/l, TDS- 748 mg/l) indicates that the treated effluent from Lagoon and Irrigation pipeline are complying w.r.t. the notified standards for irrigation purpose i.e. pH- 5.5-8.5, COD- 250 mg/l, BOD- 100 mg/l, TSS- 100 mg/l, TDS- 2100 mg/l).
19. As per the Irrigation Management Plan, the Unit provided affidavit copy of 09 farmer's regarding use of treated effluent for irrigation in fields.
20. The unit has setup environmental laboratory and sufficient chemicals were found available for analysis of daily parameters. The unit has maintained the ETP log book for daily analysis of effluent parameter.
21. The unit has generated 224.9 quintal of ETP sludge as per record provided from 15.12.2020 to 28.02.2021. The unit has 08 nos. of sludge drying bed. The sludge is being used in agriculture field as organic manure after drying.
22. Boiler ash and press mud were observed to be collected separately in open area located 2.0 km far from the unit. Sludge after drying mixed with fly ash & press mud to form bio-manure & distributed free of cost to sugar cane growers.

23. The unit has installed Online Continuous Effluent Monitoring System (OCEMS). OCEMS reading w.r.t. pH- 7.56, COD- 10.22 mg/l, BOD- 15.77 mg/l and TSS- 13.62 mg/l were recorded during inspection. OCEMS is connected with CPCB/SPCB server.
24. The unit has two underground reservoirs (UGR) for hot water and cold water recirculation having capacities 225 m3 and 150 m3.
25. The team has observed noise emitted by pump operating in the mill during the inspection.
26. The unit has three bore-wells to meet the requirement of its fresh water consumption, which was located at different places within the premises for sugar unit as below:

Table 4: Co-ordinates of bore-wells installed at M/s DSM Sugar, Mansurpur, P.O.-Mansurpur, District- Muzaffarnagar

Bore-well Details			
Sr. No.	Bore-well No.	Coordinates	
		Latitude	Latitude
1	Bore-well No. 1	29.350920	77.716861
2	Bore-well No. 2	29.354486	77.715439
3	Bore-well No. 3	29.350471	77.71716807

27. The unit is having permission to abstract 2000 m^3/day of groundwater from three existing bore-wells as per No Objection Certificate (NOC) from Central Ground Water Authority (CGWA) for ground water abstraction, which has expired on 07.06.2020. However, the unit has provided application for renewal of NOC from Ground Water Department, Uttar Pradesh and it is observed that the unit has abstracted 1637 m^3/day fresh water from existing bore-well, which is under permitted value. The month wise details of fresh water abstraction from 1st February, 2021 to 9th March, 2021 is given in Table- 5.

Table- 5. Month wise details of fresh water abstraction (from 1st Feb-2021 to 9th Mar-2021).

S. No.	Bore-well No.	Month wise fresh water abstraction (KLD) (As per logbook data from 1st Feb-21 to 9th Mar-21)		
		Feb-21	Mar-21	Total Average (KLD)
1	Bore-well No. I	0	0	0
2	Bore-well No. II	738	559	1297
3	Bore-well No. III	236	104	340
Total		**974**	**663**	**1637**

28. The unit has two piezometers well in the unit premises (**Pic no – 17 and 18**).

Table 6: Piezometers locations

S. No.	Piezometer	Location	Water Level (meter)	Latitude	Longitude
1	Piezometer No. 1	Inside the unit premises near molasses tank	9.95	29.352207	77.719309
2	Piezometer No. 2	Near administrative cane department	8.19	29.354742	77.716606

29. Ground water sample were collected from bore-well-03, installed in the unit premises and Hand-pump located outside the unit. The analysis results of the sample are placed in Table-7 below:

Table-7. Groundwater Analysis Report- Quality of Groundwater is compared with Bureau of Indian Standard (BIS) DRINKING WATER – SPECIFICATION (Second Revision) IS 10500: 2012.

Parameters, mg/l except pH, Color in Hazen				
Sampling Point	**Borewell-03 in unit premises**	**Ground Water Sample from Hand-pump**	**Drinking water standards (BIS) (Second Revision) IS 10500: 2012 (Acceptable limit)**	**Drinking water standards (BIS) (Second Revision) IS 10500: 2012 (Permissible limit in the absence of alternate source)**
Depth			---	----
pH	7.6	7.5	**6.5-8.5**	**6.5-8.5**
COD	BDL	BDL	---	----
Total Hardness	243	285	**200**	**600**
Total Alkalinity	245	316	**200**	**400**
Sulfate (SO_4^-)	07	16	**200**	**400**
Phosphate	0.05	0.05	---	----
As	BDL	BDL	**0.01**	**0.05**
Cd	BDL	BDL	**0.003**	----
Co	BDL	BDL	---	----
Cr	BDL	BDL	**0.05**	**NR***
Cu	BDL	BDL	**0.05**	**1.5**
Fe	0.04	**1.06**	**0.3**	**NR***
Mn	0.02	0.05	**0.1**	**0.3**
Ni	BDL	BDL	**0.02**	**NR***

Pb	BDL	BDL	**0.01**	**NR***
Sb	BDL	BDL	**----**	**----**
Se	BDL	BDL	**0.01**	**NR***
V	BDL	BDL	**----**	**----**
Zn	0.02	0.09	**5**	**15**
NR*=No Relaxation				

30. The analysis results of Groundwater samples, collected from bore-well-03, located inside the unit premises shows complying results as per acceptable limit of Drinking Water Standards (BIS) IS 10500:2012 for pH- 7.6, COD- BDL, Total hardness- 243 mg/l, Total alkalinity- 245 mg/l, SO4- - 7 mg/l and Phosphate - 0.05 mg/l. The analysis for heavy metal are complying w.r.t. the BIS standards,
31. Similarly, analysis results of sample collected from Hand-pump outside the unit premises shows pH- 7.5, COD- BDL, Total Hardness- 285 mg/l, Total alkalinity- 316 mg/l, SO4 - 16 mg/l and Phosphate- 0.05 mg/l, which are complying as per acceptable limit of Drinking Water Standards (BIS) IS 10500:2012. however, the analysis for heavy metal are complying w.r.t. the BIS standards except Fe is found 1.06 mg/l against the Standard of 0.3 mg/l.
32. The unit has installed Sewage Treatment Plant (STP) having capacity of 120KLPD, which is based on MBBR technology for the treatment of domestic waste water generated from its residential colony having population around 200 to 250 people.
33. The 120 KLPD STP is comprised of Old equalization tank→ Bar screen (0.5mx0.5m) → Oil skimmer power-0.5HP→ Equalization tank (5mx4mx3m) → CT (2.2mx1.5mx3m) → MBBR-1 (2.2mx2.3mx3m) → MBBR-2 (2.2mx2.3mx3m) → TS (2.mx2.2mx3m) → Chlorine contact tank (2.2mx1.5mx3m) → Water break tank (2.5mx2.5mx3m) → Dual media filter (0.8mx1.8m) → ACF (1mx1.8m).
34. The team has collected sample from inlet and outlet of STP for physico-chemical analysis. The analysis results of STP outlet (pH- 7.8, COD- 34 mg/l, BOD- 5.5 mg/l, TSS- 17 mg/l, TDS- 128 mg/l) are complying w.r.t. the notified effluent discharge norms as per NGT order dated 30.04.2019. The results are shown in Table 8 below:

Table 8. Analysis results of sample collected from STP inlet and outlet.

Parameters, mg/l except pH, Color in Hazen and Conductivity in µmho/cm								
Sample Analysis	**pH**	**COD**	**BOD**	**TSS**	**TDS**	**Phosphate**	**Ammonia**	**O & G**
STP Inlet	7.1	218	51	134	388	1.77	10	BDL
STP Outlet	7.8	34	5.5	17	128	**1.91**	-	BDL
Notified effluent discharge norms as	**5.5-9.0**	**50**	**10**	**20**	-	**1.0**	-	-

per NGT order dated 30.04.2019								

5.0 CONCLUSION:

1. The unit has installed Ion Exchange technology for decoloring sugar syrups. 90% of Brine solution reject is recovered and rest 10% is being used to spray on Bagasse, however the same is not observed by the team on the day of inspection. The team observed a drain carrying dark colored effluent with high COD and BOD values at the backside of refinery near bagasse storage area.
2. The analysis of samples collected from drain located within premises of the unit near bagasse storage (pH- 7.0, COD- 1357 mg/l, BOD- 563 mg/l, TSS- 222 mg/l, TDS- 3744 mg/l), Gram Sabha Pond (acidic pH- 5.4, COD- 1110 mg/l, BOD- 597 mg/l, TSS- 205 mg/l, Ammonia- 2.3 mg/l) and Downstream of Mansurpur drain at NH-58 (pH- 6.0, COD- 1210 mg/l, BOD- 571 mg/l, TSS- 382 mg/l, TDS- 1376 mg/l, Ammonia- 14) clearly indicate the characteristics of Industrial effluent mixed with domestic sewage.As per Daily Manufacturing Reports (DMRs) provided by the unit, the average actual crush rate (TCD) is 7196 TCD (Avg. value as per Form RT7(C) for the month of Oct-20, Nov-20, Dec-20, Jan-21, Feb-21 and Daily Manufacturing Report (DMR) for the month of Mar-21), which is more than consented capacity of 7000 TCD.
3. The unit has not provided isolated area/spot for storage of scraps, empty drums of hazardous waste chemicals in the premises which was uncovered and not fenced, which is violation of the Authorization under the provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 for storage and disposal of hazardous wastes.
4. Rotation speed of Oil and Skimmer seems too high, which fails to remove floating oil and grease from effluent.
5. The analysis results of sample collected from the ETP outlet (pH- 7.4, COD- 105 mg/l, BOD- 36 mg/l, TSS- 62 mg/l, TDS- 268 mg/l), Lagoon (pH- 8.0, COD- 35 mg/l, BOD-7.6 mg/l, TSS- 22 mg/l, TDS- 812 mg/l) and Irrigation pipeline (pH- 7.0, COD- 54 mg/l, BOD-14 mg/l, TSS- 32 mg/l, TDS- 748 mg/l) are complying w.r.t. the notified standards for land disposal (pH- 5.5-8.5, COD- 250 mg/l, BOD- 100 mg/l, TSS- 100 mg/l, TDS- 2100 mg/l).
6. The unit has applied for renewal of CGWA permission on 16.04.2020 as previous is expired on 07.06.2020 for ground water abstraction from three existing bore-wells. The unit has provided application for renewal of NOC from Ground Water Department, Uttar Pradesh. The unit has abstracted 1637 m3/day fresh water from existing bore-well, which is under permitted value.
7. The analysis results of Groundwater samples, collected from bore-well-03, located inside the unit premises shows results which are within the acceptable limit of Drinking Water Standards (BIS) IS 10500:2012 for pH- 7.6, COD- BDL, Total hardness- 243 mg/l, Total alkalinity- 245 mg/l, SO4- - 7 mg/l and

Phosphate- 0.05 mg/l. The analysis for heavy metal are complying w.r.t. the BIS standards.

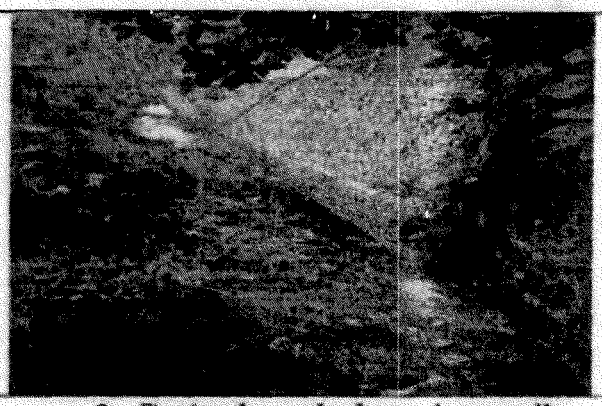
8. The analysis results of sample collected from Hand-pump outside the unit premises shows that Fe is found 1.06 mg/l against the BIS except Standard of 0.3 mg/l.
9. The unit has not installed flow meter to measure amount of treated effluent used for irrigation purpose.
10. The unit has installed Sewage Treatment Plant (STP) having capacity of 120KLPD, which is based on MBBR technology for the treatment of domestic waste water generated from its residential colony having population around 200 to 250 people and the samples collected from inlet and outlet of STP for physico-chemical analysis. The analysis results of STP outlet (pH- 7.8, COD- 34 mg/l, BOD- 5.5 mg/l, TSS- 17 mg/l, TDS- 128 mg/l) are complying w.r.t. the notified standards for land disposal

6.0 RECOMMENDATIONS:

1. The unit shall dismantle all the pipelines/ opening from the boundary wall of the unit towards the outside drain surrounding the mill.
2. The unit shall optimize the rotation speed of Oil and Skimmer for proper removal of floating oil and grease from effluent.
3. The unit shall stop discharge/seepage of untreated/partially treated effluent in the surrounding drain as well as in Gram Sabha Pond.
4. The unit shall maintain and limit its crushing operations as per the consented capacity of 7000 TCD.
5. The unit shall establish an isolated area/spot with well concreted surface, covered ceiling and proper fencing exclusively for the storage of scraps, empty drums of hazardous waste chemicals in the premises.
6. The unit shall maintain the proper documents w.r.t. the scraps and wastes which is being handed over to the third party for the disposal and follow the specific conditions of Authorization under the provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 for storage and disposal of hazardous wastes.
7. The unit shall install flow meter to measure amount of treated effluent used for irrigation purpose.
8. The unit shall maintain the MLSS value and MLVSS/MLSS ratio in the aeration tank for proper microbial activity to reduce the organic load in the effluent. The unit shall analyze samples from aeration tank periodically to analyze the MLVSS/MLSS ratio.
9. The unit shall maintain the acoustic enclosures to operate pumps in the unit premises to reduce the noise pollution.

7.0 PHOTOGRAPHS

1. Mansurpur drain at NH-58



2. Drain along the boundary wall

3. Effluent Treatment Plant area

4. Oil and Grease Trap

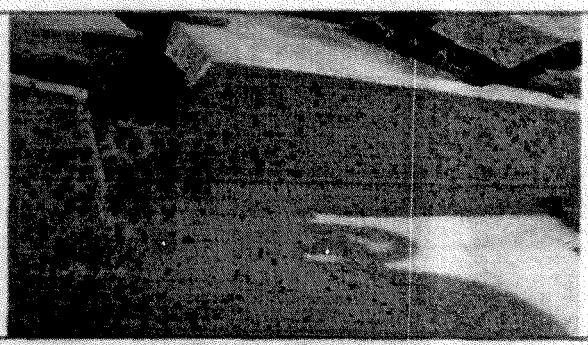
5. Chemical Mixing Tank

6. Equalization Tank

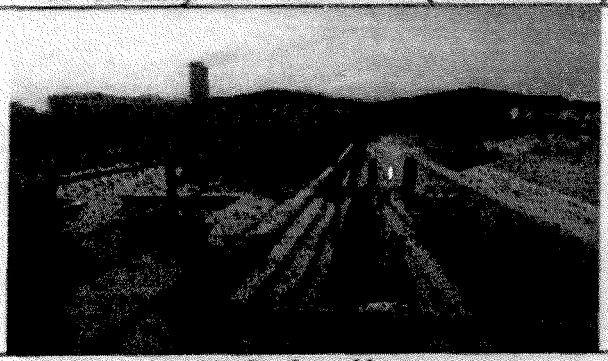
7. Aeration tank

8. Primary Clarifier

9. Tertiary treatment units (DMF & ACF)

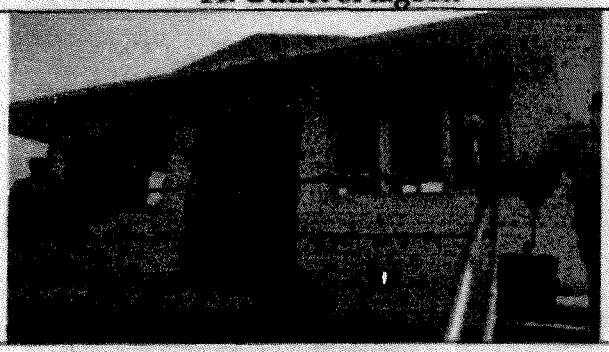


10. Outlet of treated water



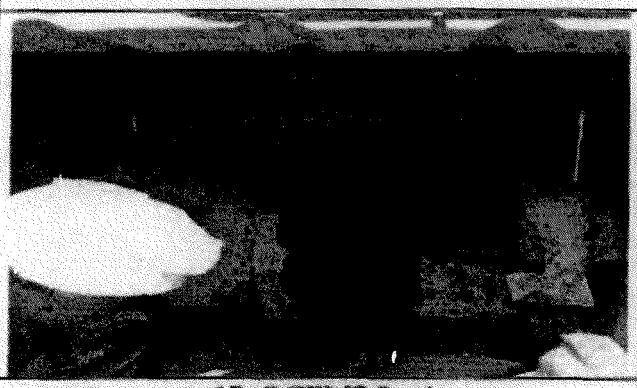
11. Outlet of lagoon

12. Lagoon (10,000 m^3)

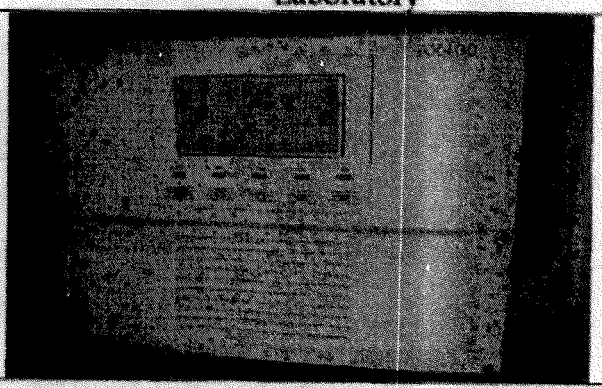


13. Environmental Laboratory

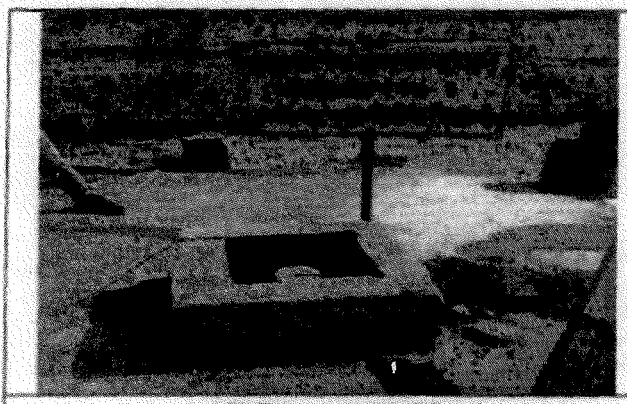
14. Equipment for analysis inside Laboratory



15. OCEMS Station



16. pH meter

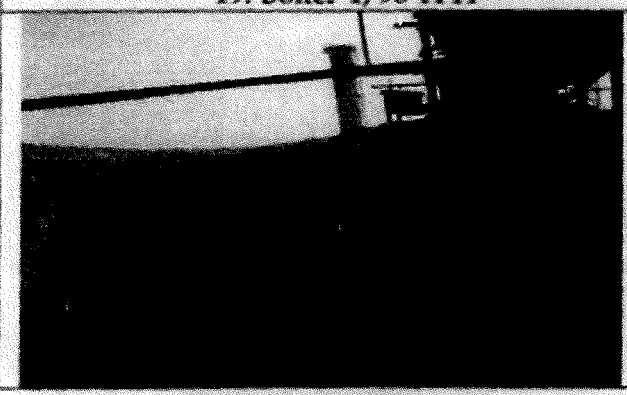


17. Piezometer No. 1

18. Display of Piezometer No. 2

19. Boiler-1, 90 TPH

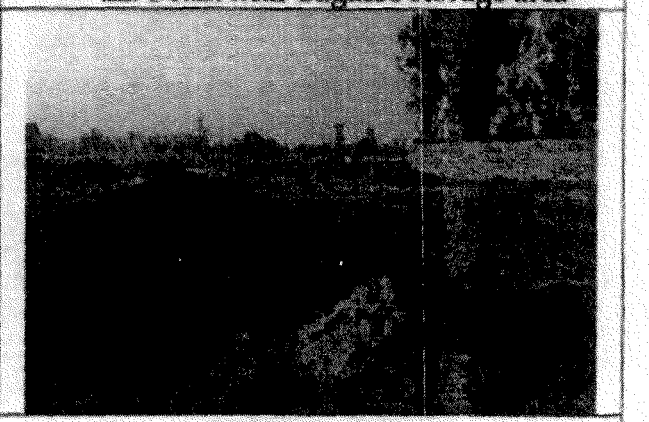
20. Boiler-2, 100 TPH



21. Bagasse storage area

22. Drain near Bagasse storage area

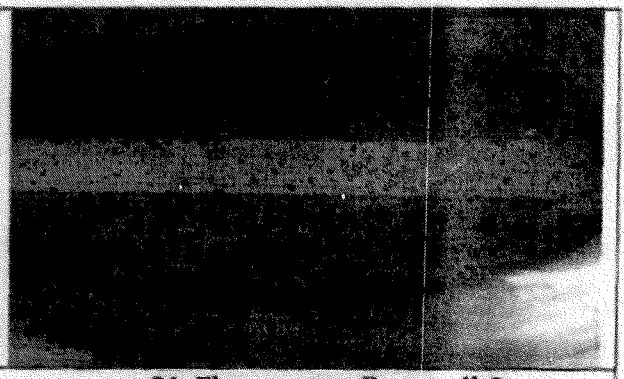
23. Cooling tower



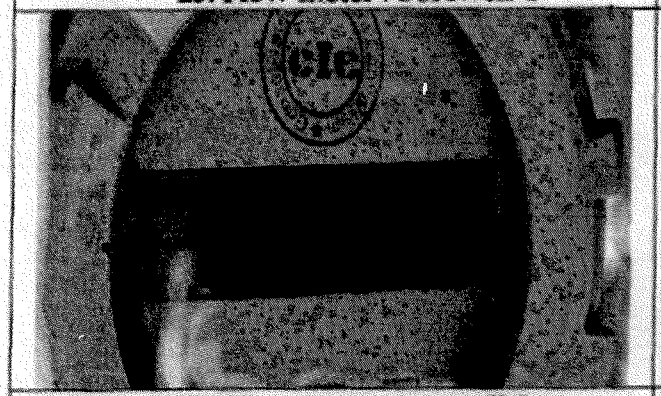
24. Press mud yard

Rm wipl

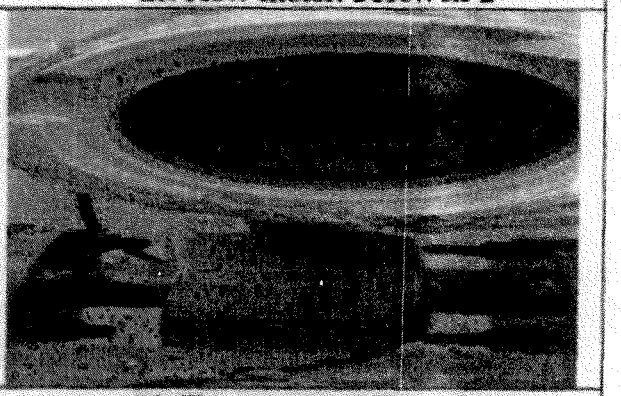
25. Flow meter : Borewell-1



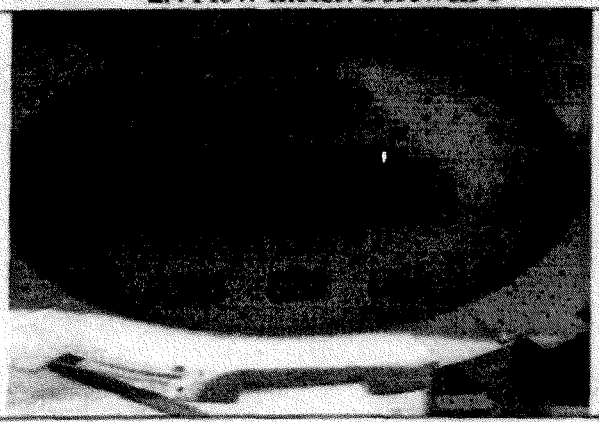
26. Flow meter: Borewell-2



27. Flow meter: Borewell-3

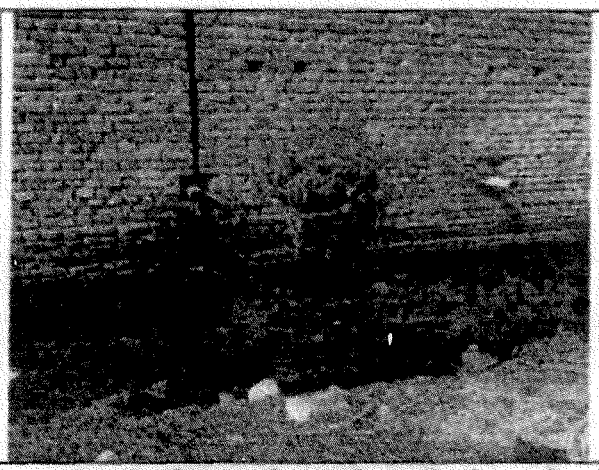


28. Flow meter: STP Outlet

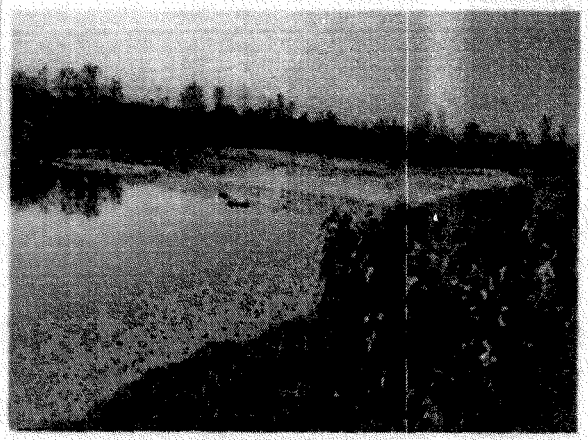


29. Flow meter at ETP inlet

30. Flow meter at ETP outlet



31. Outlets in drain along the boundary wall near railway track



32. Gram Sabha Pond

33. Drain near Kali River

34. Hand-pump outside the unit

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8.0 INSPECTION TEAM

S. No.	Name of the inspecting officers	Designation	Signature
1	Ms. Reena Satavan	Sc-'D', Central Pollution Control Board, Delhi	
2	Sh. Vipul Kumar	Junior Engineer, Regional Office, Uttar Pradesh Pollution Control Board, Muzaffarnagar	
3	Sh. Ashwani K. Singh	R.A.-II, Central Pollution Control Board, Delhi	
4	Ms. Sonam Lally	SRF, Central Pollution Control Board, Delhi	

O/C

ANNEXURE : R1/C

53

dhampur

Dhampur Sugar Mills Limited
Unit : Mansurpur - 251203
Village : Khanupur, Tehsil : Khatauli
Distt. : Muzaffarnagar U. P.
Tel : +91-1396 252238, Fax : 252170
E-mail : dsmmansurpur@dhampur.com
website : www.dhampur.com

Ref No : DSM/MSM/ 887-89/12/08/2021

29-07-2021

The Regional Officer,
U.P Pollution Control Board,
Kamal Cinema Building, Railway Station Road,
Muzaffarnagar – 251 001 (U.P)

Ref. : **Reply to Joint Inspection Report of UPPCB & CPCB held on 09-03-21 at DSM Sugar Mansurpur, Dist. Muzaffarnagar.**

Dear Sir,

Please refer to the above-mentioned Joint Inspection Report of UPPCB & CPCB in compliance to the directions, issued by Hon'ble National Green Tribunal in OA no.16/2021 on 28-01-2021.

In this regard, we are submitting our point wise reply to the recommendations mentioned in the report, which are as under -

No. 1 - The unit shall dismantle all the pipelines / openings from the boundary wall of the units towards the outside drain surrounding the mill.

Reply - The pipelines / openings, mentioned in the recommendations are actually drains of domestic water and general toilets being used by farmers. With regard to the effluent of sugar mill, we would like to mention that we have only single outlet point (MS pipeline) from our sugar mill through which effluent is being transferred to the sugar mill's ETP.

No. 2 - Point No. 2 – The unit shall optimize the rotation speed of oil & skimmer for proper removal of floating oil & grease from effluent.

Reply - The unit shall regulate the rotation speed of oil & skimmer for proper removal of floating oil & grease from effluent. This work shall be completed before the start of the next crushing operation, which will start in the first week of Oct-21.

dhampur
Dhampur Sugar Mills Limited
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website : www.dhampur.com

No. 3 – The unit shall stop discharge / seepage of untreated / partially treated effluent in the surrounding drain as well as in Gram Sabha Pond.

Reply - It is submitted that we strictly follow the guidelines of CPCB / UPPCB with regard to discharge of effluent from sugar mill. Whatsoever, effluent is discharged, it is used in the irrigation fields as per norms. **However, we would like to mention that a distillery is located adjacent to our sugar mill (having common boundary with the sugar mill). Whatsoever, discharge / seepage is found, it comes from the distillery as there is a common drain for sugar mill as well as distillery for the last many decades. We have already requested the management of distillery to follow ZLD norms, so that we may not be entangled and blamed for any such activity.**

No.4 - The unit shall maintain & limit its crushing operation as per the consented capacity of 7000 TCD.

Reply - Average crush rate of season 2020-21 is 6849 MT/day. Which is under consented limit.

No. 5 – The unit shall establish an isolated area / spot with well concreted surface, covered sealing and proper fencing exclusively for the storage of scrap, empty drum of hazardous waste chemicals in the premises.

Reply - We have already initiated the work to maintain such area and will complete before start of the crushing season 2021-22.

No.6 - The unit shall maintain the proper document w.r.t. the scrap and waste which is being handover to the third party for the disposal and follow the specific conditions of authorization under the provision of hazardous and other wastes (Management & transboundary movement) rules, 2016 for the storage & disposal of hazardous waste.

dhampur
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website : www.dhampur.com

Reply - We have an agreement with M/s **Bharat Oil and Waste Management Ltd** (BOWML), having it's registered and corporate office at 11, LGF, Community Center, East Of Kailash, New Delhi 110065 for the disposal of hazardous and other wastes. We have proper record of hazardous waste. We are enclosing herewith a copy for reference. However, if required, we shall modify the pattern of record keeping as per directions/ guidelines, if any.

No. 7 – The unit shall install flow meter to measure amount of treated effluent used for irrigation purpose.

Reply - We will install the required flow meter to measure amount of treated effluent used for irrigation before start of the crushing season 2021-22. (ie. by October 2021).

No. 8 – The unit shall maintain the MLSS value & MLVSS / MLSS ratio in the aeration tank for proper microbial activity to reduce the organic load in the effluent. The unit shall analyze samples from aeration tank periodically to analyze the MLVSS / MLSS Ratio.

Reply - We have installed Effluent Treatment Plant of a capacity of 1600 KLPD to treat the factory effluent. Working of our effluent treatment plant was found to be satisfactory during season. During the analysis of samples drawn from our ETP by M/s Newcon Consultants and Laboratories, Ghaziabad (recognized/ accredited by the department), the parameters of treated effluent were found as per standard laid down by Pollution Board. We have contracted M/S Newcon Consultants and Laboratories, Ghaziabad, recognized by UPPCB to analyze our treated effluent. They draw the sample themselves of treated effluent during season and analyze on a regular basis. All the equipments of ETP are in operational condition ie. Bar screen chamber, Oil & Grease trap, Chemical mixing tank, Equalization Tank, Primary Clarifier, Aeration Tank, Secondary Clarifier, sludge drying beds, sludge filter press and seepage proof lagoon for treated water of 10000 m3 capacity. The territory treatment units viz. dual media filter and activated carbon filter has also been installed to meet out the treated water norms as per standards laid down by Pollution Board. We are also upgrading our system for more recycling of treated effluent & reduce the effluent generation. We will complete the work before start of the crushing season 2021-22. (ie. by October 2021)

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Dhampur Sugar Mills Limited
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Further, we would also like to clarify that the Gram Sabha pond is connected with the drain which is coming from the village as well as from Sir Shadi Lal distillery which is adjacent to our unit. It has no linkage with the Sugar mill.

No. 9 - The unit shall maintain the acoustic enclosures to operate pump in the unit premises to reduce the noise pollution.

Reply - We have a contract with M/S Newcon Consultants and Laboratories, Ghaziabad, recognized by UPPCB to analyze noise level in factory premises. They check noise level on a regular basis during season. We are enclosing herewith the copy of report for reference.

We also assure that the sugar mill follows all the norms laid down by the concerned pollution control board and shall expedite all the directions within stipulated time. Hope you will find the same in order.

Thanking you,

Yours faithfully,
for DSM Sugar Mansurpur

(Authorized Signatory)

12-8-21

C.C to :

1) Sh. N.K Chauhan, Chief Environment Officer (Circle –III), UPPCB, T.C 12 V, Vibhuti Khand, Gomti Nagar, Lucknow 226 010 (U.P)
2) Member Secretary, CPCB, Parivesh Bhawan, East Arjun Nagar, Delhi- 110032.

O/C ANNEXURE: R1/D

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dhampur
Dhampur Sugar Mills Limited
Unit : Mansurpur - 251203
Village : Khanupur, Tehsil : Khatauli
Distt. : Muzaffarnagar U. P.
Tel : +91-1396 252238, Fax : 252170
E-mail : dsmmansurpur@dhampur.com
website : www.dhampur.com

Ref. No : DSM/MSM/ 891-893/12 08/2021

11-08-21

The Regional Officer,
UP Pollution Control Board,
Kamal Cinema Building,
Railway Station Road,
Muzaffarnagar-251001
U. P.

Subject: Additional submission in continuation to our reply dated 29-07-21

Sir,

In continuation to our reply dated 29-07-21, we wish to further submit the below mentioned facts –

1. On perusing the Annexure- A 4 of OA 16/2021 (page 35-36 of the application), it seems that Vinit Kumar, the applicant got the effluent water tested at his own from Shriram Institute for Industrial Research, Delhi.

2. The samples collected from outer drain are not related to our sugar mill only. Effluent from Sir Shadi Lal Distillery and Chemical Works passes through the same outer drain.

3. According to the point no. 10, 15, 16 & 17 of observations of Joint Inspection Report (page no.15, 16 & 17 of Joint Inspection Report), it is clear that sugar mill was adhering to the prescribed norms.

4. The analysis of groundwater sample from Borewell, located inside our unit, as collected by the joint inspection team, shows that the water was absolutely conforming to applicable norms for drinking water BIS Standards. (point no. 26 of observations of Joint Inspection Report)

5. Vinit Kumar, the applicant is trying to malign our Unit for his own personal gains.

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dhampur

Dhampur Sugar Mills Limited
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Village : Khanupur, Tehsil : Khatauli
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E-mail : dsmmansurpur@dhampur.com
website : www.dhampur.com

We request your good self to treat the above mentioned facts as a part of our reply dated 29-07-21.

Thanking you,

Your Faithfully

For DSM Sugar Mansurpur
(unit of Dhampur Sugar Mills Ltd.)

(Authorized Signatory)

C.C to :

1) Sh. N.K Chauhan, Chief Environment Officer (Circle –III), UPPCB, T.C 12 V, Vibhuti Khand, Gomti Nagar, Lucknow 226 010 (U.P).

2) Member Secretary, CPCB, Parivesh Bhawan, East Arjun Nagar, Delhi- 110032.

ANNEXURE : R1/E

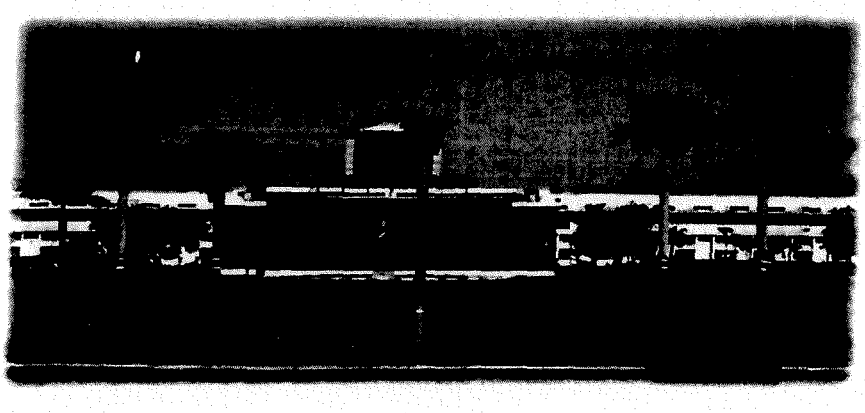
59

UTILIZATION OF TREATED EFFLUENT FOR IRRIGATION PURPOSE

FOR

M/s DSM Sugar, Mansurpur
(A Unit of Dhampur Sugar Mills Ltd.)
District- Muzaffarnagar, Uttar Pradesh

PREPARED BY:



NATIONAL SUGAR INSTITUTE
Government of India
Ministry of Consumer Affairs, Food & Public Distribution
Department of Food & Public Distribution
Kanpur- 208 017 (U.P.) India
Ph. +91-512-2570730, 2570273
Fax. +91-512-2570247

Introduction of factory:

M/s DSM Sugar-Mansurpur(A Unit of Dhampur Sugar Mills Ltd.), Muzaffarnagar was incorporated in 1933. At present it is engaged in producing refined sugar (sulphur less sugar). It is spread in 36 Acres land, operates as a sugar manufacturing Company which produces various products and byproducts such as sulphurless sugar and Co-generates power. It has installed capacity of 8000 TCD.

Factory Performance:

S. No.	Particulars	2014-15	2015-16	2016-17
1.	Duration of season (days)	155	140	170
2.	Average sugarcane crushed per day (TCD)	7040	6994	6926
3.	Total sugarcane crushed (Qts)	10865148.87	9756775.60	11751039.0

1. **Visit Undertaken:-**

The Factory was visited on 17.10.2017 by Dr. Ashok Kumar, Assistant Professor (Agriculture Chemistry). Factory officials, Shri Ashish Kumar (Process Head), Shri Sarad Raz Khan (Q.C. Head), Shri Baldhari Singh (Cane Head), Shri Surendra Kunwar (Senior Officer-water chemistry) were present during the visit.

2. **Observation & Discussions:-**

To assess the adequacy of the ETP Plant, a separate visit was paid by the institute officials. Since the visit was undertaken during the off-season of the factory. It was not possible to physically observe the working of effluent Treatment Plant and verify the processing and other conditions, particularly, with respect to water uses, its conservation and quantity & quality of waste water discharge, the adequacy of the irrigation plan is also based on the data provided by the factory with respect to area available, crop pattern and tie up made with the farmers.

29/10/17

3. **Effluent Generation:** Copies of analysis reports of treated effluent and data communicated to UPPCB server is **attached as Annexure-I.**

Existing arrangement of treatment: Details of different units of ETP with capacity & dimensions **attached as Annexure-II.**

4. **Storage lagoon:** Capacity 10000**KL. Attached as Annexure-III.**

5. **Cropping pattern of the area:** At command area of **M/s** DSM Sugar-Mansurpur (A Unit of Dhampur Sugar Mills Ltd), Muzaffarnagar, 25500 hectare cultivable area is available and sugar cane is grown as main cash crop. The cropping pattern is as follows:-

A. Wheat –Sugarcane (Plant)- Sugarcane(Ratoon) – 2 Years
B. Mustard-Sugarcane (Plant) - Sugarcane (Ratoon)- 2 Years
C. Paddy – Wheat – Sugarcane (Plant) - Sugarcane (Ratoon)- 2 Years

6. Quantity of effluent available for land application (KL/day):

a. Capacity of the Sugar plant –8000 **TCD**
b. Estimated average Effluent generation per day @200 liters/ton of cane crushed **-1600KL/day**
c. Net effluent generation left for irrigation after treatment – 1600**KL/day**
d. Total treated effluent generated for average crushing for 170 days (days considered on the basis of past track record)
=170 x 1600= 2,72,000 **KL/Crushing Season**

7. Characteristics of treated effluent:

S. No.	Particular	Range
1.	pH	6.85-7.57
2.	BOD	13.61-26.1 ppm
3.	COD	115-160 ppm
4.	TSS	9.19- 19.1 ppm

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The above values are as per data transmitted by **M/s DSM Sugar-Mansurpur** (A unit of Dhampur sugar Mills Ltd)to CPCB/PCB server through real time monitoring system during crushing season 2016-17. The copies are enclosed as **annexure-I.**

8. Command area:

S. No.	Soil texture	Effluent loading rate(KL/hectare/day)
1	Sandy loam	170-225(average 197m³/hectare/day or say 200m³/ hectare day)

On the basis of soil report, the Soil of the command area of factory is sandy loam.

9. Command area identified:

S. No.	Total available area (hectare)	Area available at 70 % land efficiency	Distance from unit (Km)	Mode of Effluent Transport
1.	190 (Farmer land)	133	Within 1 km.	MS &PVC Pipe Lines and water tankers
	Total = 190	**133**		

Details of farmer fields to be used for irrigation purpose with farmer's name, area, distance And crops cultivated **attached as Annexure-IV.**

10. Details of crop area:

S. No.	Location/ Village	Total available area (hectare)	Crop area under effluent application (hectare)		
			Kharif	Rabi	Annual (sugar cane)
1.	Farmer land	190	-	30.00	160.00
	Total	**190**	-	**30.00**	**160.00**

11. Yearly total treated water balance with respect to land available for irrigation for different crops keeping in view of the loading rates for different soil textures:

S. No.	Land Particular	Area (Hect.)	Area available at 70 % land efficiency (Hect.)	Water Loading	Irrigation interval (days)	Average Crushing days	Water Requirement KL/annum
1.	Farmer land (Sugarcane)	160	112	200	15	170	2,53,866.67
2.	Wheat	30	21	200	25	170	28560.00
		190	**133**		**Total**		**2,82,426.67**

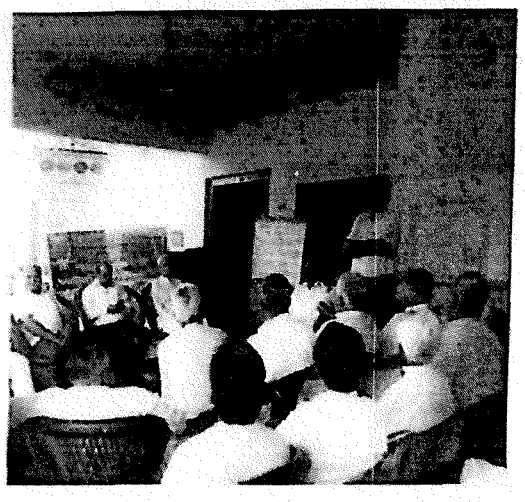
12. Effluent application scheme:

A. **Storage and transportation: M/s DSM Sugar Mansurpur** (A unit of Dhampur Sugar Mills Ltd), has Lagoon with a capacity of 10000 cubic meters from here it is to be transported to the targeted area through PVC or MS pipe lines and also through tankers to the desired field.

B. **Irrigation schedule &plan of the command area:** The treated effluent is available from October-November to April depending upon the duration of crushing season which is generally below 170 days **(attached as Annexure-V)**. In Mansurpur Area, intensive agriculture is practiced by farmers wherein wheat is immediately sown after ratoon cane harvesting and land is not left vacant. This intensive agriculture requires continuous use of water. The effluent provided to the farmers is a great help to them as it is available on weekly rotation schedule of the farmers.

According to the weather condition of area, the farmers provide irrigation to cane field at 12-15 days intervals. Similarly, wheat is also provided irrigation within 3 week interval. Sugarcane is a crop which requires water in abundant through its life span. After sugarcane, wheat is the major crop of area and it is efficient in taking up moisture of soil. For raising wheat crop successfully, water

S. No.	Activity	Schedule
1	Kishan Gosthis	Bimonthly
2	Field monitoring	Monthly



13. **Basic requirement and monitoring schedule:** To monitor the Irrigation system factory has a team under the leadership of Shri Bagesh Malik, Manager (Cane) who co-ordinates with Mr. Anil Sharma (Dy. Cane Manager) for implementing irrigation plan and monitoring it continuously. The factory also circulates contact nos. of responsible officers to contracted farmers to inform the need of irrigation round the clock.

14. **Technical backup and man power deployed: M/s** DSM Sugar-Mansurpur has a backup of technical team for repairing of effluent supply line & daily maintenance requirement. In addition, cane professionals deputed by **M/s** DSM-Mansurpur factory are guiding and will continue to guide farmers about the use of treated water proficiently. Shri Rajeev Tiwari (Additional Chief Engineer) along with his technical team looks after the maintenance part.

15. **Physico-chemical properties of soil: M/s** DSM Sugar Mansurpur (A unit of Dhampur Sugar Mills Ltd)reported following details with respect to analysis of the soil of the

envisaged area where treated effluent is proposed to be used for irrigation purposes. Analysis report of soil is attached as **Annexure-VII**. The analytical details are as given below:

S. No.	Particular	Result
1.	pH	6.55-8.01
2.	EC	0.06 to 0.43µS/cm
3.	Bulk density	1.29g/cc
4.	Particle density	2.70g/cc
5.	Porosity	52.23 %
6.	Sand	75.8 %
7.	Silt	14.04%
8.	Clay	10.16%
9.	Ca	276-341 mg/Kg
10.	Mg	66 to 140 mg/Kg
11.	Na	95.80 mg/Kg
12.	K	113 to392 Kg/Hectare
13.	P_2O_5	48.2 Kg/Hectare
14.	$CaCO_3$	272 mg/Kg
15.	Cl	180.26 mg/Kg
16.	SO_4	170.20mg/Kg

CONCLUSION:

1. The irrigation management plan proposed by DSM Sugar Mansurpur (A Unit of Dhampur Sugar Mills Ltd.) may be considered to be in order to use treated effluent for irrigation for the autumn and spring planted sugarcane and also for wheat. The proposed system shall be able to cope up with the requirement of utilization of the generated effluent for irrigation purposes.
2. Since the Factory visit was undertaken during of season when treated effluent was not available, as such, the actual assessment shall be possible during crushing only when the sugar plant will be an operation.

3. However, the factory should strengthen its system for supervising and maintaining the irrigation plan while using the treated effluent. They should clearly prepare a responsibility chart for implementation.

(Dr. Ashok Kumar)
Assistant Professor (Agril. Chemistry)

NATIONAL SUGAR INSTITUTE
Government of India
Ministry of Consumer Affairs, Food & Public Distribution
Department of Food & Public Distribution
Kanpur- 208 017 (U.P.) India

ANNEXURE : R1/F (colly)

(67)

Newcon Consultants & Laboratories

An ISO 9001 : 2015, ISO 14001 : 2015, ISO 45001 : 2018 Certified Laboratory
NABL ISO/IEC 17025 : 2017 (Testing, Cert. No. TC-5526) Accreditated Laboratory
Recognised by MOEFCC

JAS-ANZ ICS ISO 9001/14001/45001 Reg. No. R151/7381

Website : www.newconlab.in

TEST CERTIFICATE

STACK EMISSION MONITORING AND ANALYSIS REPORT

TEST REPORT NO : NCL/DSMSM/1205/1/120501/37	DATE OF REPORT : 15-05-2021
Name And Address Of Customer	DSM SUGAR MANSURPUR, (A UNIT OF DHAMPUR SUGAR MILLS LTD.) , ,MUZAFFARNAGAR,U.P., INDIA

SAMPLING DETAIL

Analysis Start Date	12-05-2021	Analysis End Date	15-05-2021
Date Of Sampling	11-05-2021	Sampling Done By	NCL
Sampling Protocol	AS PER CPCB GUIDELINES	Duration Of Sampling	30 MINUTES
Equipment Used	Vayubodhan Stack Sampler VSS1 (S.No. : 321-DTC-07), , ,		

DETAILS OF STACK

Stack Attached To	BOILER		
Capacity	100 TPH		
Type Of Fuel Used	BAGASSE		
Quantity Of Fuel Used	44.0 Ton/Hr		
Stack Height Above The Ground level	60.0 Mtr	Stack Dia At The Top	3000 mm
Attached APCS	ESP	Material Of Construction	RCC
		Normal Operation Schedule	24 Hrs

PHYSICAL OBSERVATIONS

Ambient Temperature	31°C	Flue Gas Temperature	124°C
Velocity Of Flue Gases	7.3 Mtr/Sec	Sampling Flow Rate For SPM	20.0 LPM
Sampling Flow Rate For Gases	2.2 LPM	Quantity Of Emission Discharged	185668.2m³/hr

TEST RESULT

S.No.	Parameter	Unit	Protocol	Result	Specification/ Limit (As Per CPCB)
1	Particulate Matters (PM)	mg/Nm³	IS:11255 (P-1)	94	150
2	Sulphur Dioxide (SO_2)	mg/Nm³	IS:11255 (P-2)	38	Not Specified
3	Carbon Monoxide (CO)	% by Vol	IS:13270	0.20	1% By Volume
4	Oxides of Nitrogen	mg/Nm³	IS:11255 (P-7)	54	Not Specified

**** End Of Report****

FOR NEWCON CONSULTANTS & LABORATORIES

INTEKHAB KHAN
M.Sc (Env. Science)
CHECKED BY

NEWCON CONSULTANTS & LABORATORIES GHAZIABAD Phone No. 0120-2803115

PREPARED BY

AMIT KUMAR SINGH TECHNICAL

AUTHORIZED SIGNATORY

NOTE : 1. The Results reported above pertains to the Tested parameters only. Endorsement of the same is neither inferred nor implied. 2. All disputes subject to GHAZIABAD JURISDICTION. 3. The Report shall not be reproduced except in full without the permission of MANAGING PARTNER. 4. Our liability is limited to invoiced value only.

Format no. NCL/QSP-28/TF-SE/EMT-01, Rev.No.1 Date 18.07.2017

Laboratory : A-1/156, Sector-17, (Swadeshi Compound) Kavi Nagar Industrial Area, GHAZIABAD - 201 002 (U.P.)
Phone No.: 0120-2803115 | **Mobile :** 9810430345 | **Website :** www.newconlab.in
E-mail : newconlab@gmail.com, newconlabfinance@gmail.com

16 Aug 2021, 5:23 PM

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JAS-ANZ ISO 9001/14001/45001 Reg. No. R131/7381

Website : www.newconlab.in

TEST CERTIFICATE

STACK EMISSION MONITORING AND ANALYSIS REPORT

TEST REPORT NO : NCL/DSMSM/1205/1/120501/38	DATE OF REPORT : 15-05-2021
Name And Address Of Customer	DSM SUGAR MANSURPUR, (A UNIT OF DHAMPUR SUGAR MILLS LTD.) , ,MUZAFFARNAGAR,U.P., INDIA

SAMPLING DETAIL

Analysis Start Date	12-05-2021	Analysis End Date	15-05-2021
Date Of Sampling	11-05-2021	Sampling Done By	NCL
Sampling Protocol	AS PER CPCB GUIDELINES	Duration Of Sampling	30 MINUTES
Equipment Used	Vayubodhan Stack Sampler VSS1 (S.No. : 321-DTC-07), , ,		

DETAILS OF STACK

Stack Attached To	BOILER		
Capacity	90 TPH		
Type Of Fuel Used	BAGASSE		
Quantity Of Fuel Used	42.0 Ton/Hr		
Stack Height Above The Ground level	60.0 Mtr	Stack Dia At The Top	3000 mm
Attached APCS	ESP	Material Of Construction	RCC
		Normal Operation Schedule	24 Hrs

PHYSICAL OBSERVATIONS

Ambient Temperature	31°C	Flue Gas Temperature	126°C
Velocity Of Flue Gases	7.5 Mtr/Sec	Sampling Flow Rate For SPM	20.0 LPM
Sampling Flow Rate For Gases	2.3 LPM	Quantity Of Emission Discharged	190755m³/hr

TEST RESULT

S.No.	Parameter	Unit	Protocol	Result	Specification/ Limit (As Per CPCB)
1	Particulate Matters (PM)	mg/Nm³	IS:11255 (P-1)	91	150
2	Sulphur Dioxide (SO_2)	mg/Nm³	IS:11255 (P-2)	42	Not Specified
3	Carbon Monoxide (CO)	% by Vol	IS:13270	0.12	1% By Volume
4	Oxides of Nitrogen	mg/Nm³	IS:11255 (P-7)	49	Not Specified

**** End Of Report****

FOR NEWCON CONSULTANTS & LABORATORIES

INTEKHAB KHAN
M.Sc (Env Science)
CHECKED BY

PREPARED BY

AUTHORIZED SIGNATORY

Format no NCL/QSP-28/TC-SET/EMT-01, Rev.No.1 Date 18.07.2017

NOTE : 1. The Results reported above pertains to the Tested parameters only. Endorsement of the same is neither inferred nor implied. 2. All disputes subject to GHAZIABAD JURISDICTION. 3. The Report shall not be reproduced except in full without the permission of MANAGING PARTNER. 4. Our liability is limited to invoiced value only.

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Recognised by MOEFCC

Website : www.newconlab.in

ISO 9001/14001/45001 Reg. No. R191/7381

TEST REPORT NO : NCL/DSMSM/1205/1/120501/41 **DATE OF REPORT : 17-05-2021** Page 1 Of 1

Name And Address Of Customer	DSM SUGAR MANSURPUR, (A UNIT OF DHAMPUR SUGAR MILLS LTD.) , ,MUZAFFARNAGAR,U.P., INDIA

SAMPLING DETAILS

Analysis Start Date	12-05-2021	**Analysis End Date**	17-05-2021
Date of Sampling	12-05-2021	**Sampling ID No.**	120501/41/2021-2022
Time of Sampling	12:20		
Sampling Done By	CUSTOMER		
Sampling Location	ETP OUTLET		
Sampling Description	EFFLUENT WATER AFTER TREATMENT		
Sampling Protocol	IS:3025(Part-I)	**Sampling Quantity**	TWO Lt
Packing Condition	Sealed	**Packed In**	Glass Bottle

TEST RESULT

S.No.	Parameter	Unit	Protocol	Result	Standards (CPCB) (Max)	
					Inland Surface Water	Public Sewer
1	pH	--	APHA-4500(H+B)	7.34	6.0-9.0	5.5-9.0
2	Bio Chemical Oxygen Demand (3 days at 27°C)	mg/L	APHA-5210 (B)	21	30	350
3	Chemical Oxygen Demand (COD)	mg/L	APHA-5220 (B)	78	250	Not Specified
4	Oil & Grease	mg/L	APHA-5520	2.4	10	20
5	S.S. (Total Suspended Solids)	mg/L	APHA-2540 (H+B)	24	30 (For Sugar Mills)	600

STANDARD FOR TSS IN TREATED DISCHAGE OF SUGAR MILL IS 30 mg/L

**** End Of Report****

FOR NEWCON CONSULTANTS & LABORATORIES

INTEKHAB KHAN
M.Sc (Env. Science)
CHECKED BY

NEWCON CONSULTANTS & LABORATORIES GHAZIABAD Phone No. 0120-2803115
PREPARED BY

AUTHORIZED SIGNATORY

Format no NCL/QSP-28/TC-WWT/FMT-04 SRev.No.1 Date 18.07.2011

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An ISO 9001 : 2015, ISO 14001 : 2015, ISO 45001 : 2018 Certified Laboratory
NABL ISO/IEC 17025 : 2017 (Testing, Cert. No. TC-5526) Accreditated Laboratory
Recognised by MOEFCC

Website : www.newconlab.in

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ISO 9001/14001/45001
Reg. No. R191/7381

TEST REPORT NO : NCL/DSMSM/1205/1/120501/40 DATE OF REPORT : 15-05-2021 Page 1 Of 1

EFFLUENT WATER ANALYSIS REPORT

Name And Address Of Customer	DSM SUGAR MANSURPUR, (A UNIT OF DHAMPUR SUGAR MILLS LTD.) , ,MUZAFFARNAGAR,U.P., INDIA

SAMPLING DETAILS

Analysis Start Date	12-05-2021	Analysis End Date	15-05-2021
Date of Sampling	12-05-2021	Sampling ID No.	120501/40/2021-2022
Time of Sampling	11:30		
Sampling Done By	NCL		
Sampling Location	ETP INLET		
Sampling Description	EFFLUENT WATER BEFORE TREATMENT		
Sampling Protocol	IS:3025(Part-I)	Sampling Quantity	TWO Lt
Packing Condition	Sealed	Packed In	Glass Bottle

TEST RESULT

S.No.	Parameter	Unit	Protocol	Result
1	pH	–	APHA-4500(H+B)	5.69
2	Total Suspended Solids (TSS)	mg/L	APHA-2540 (D)	78
3	Bio Chemical Oxygen Demand (3 days at 27°C)	mg/L	APHA-5210 (B)	540
4	Chemical Oxygen Demand (COD)	mg/L	APHA-5220 (B)	3279
5	Oil & Grease	mg/L	APHA-5520	7.8

**** End Of Report****

FOR NEWCON CONSULTANTS & LABORATORIES

44142/17
An IMS, NABL & MOEFCC Recognised Laboratory

INTEKHAB KHAN (Env. Science)
M.CHECKED BY

PREPARED BY

AMIT KUMAR SINGH
TECHNICAL
AUTHORIZED SIGNATORY

Format no NCL/QSP-28/TC-WWT/FMT-04/ Rev.No.1 Date 18.07.2011

ANNEXURE : R1/G (Colly)

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TEST CERTIFICATE

NOISE MONITORING REPORT

TEST REPORT NO : NCL/DSMM/7311/038/22/03-2021 DATE OF REPORT : 27-03-2021

Name And Address Of Customer	DSM SUGAR MANSURPUR, (A UNIT OF DHAMPUR SUGAR MILLS LTD.) , MANSURPUR,MUZAFFARNAGAR,U.P., INDIA

SAMPLING DETAILS

Analysis Start Date	20-03-2021	Analysis End Date	20-03-2021
Date of Monitoring	20-03-2021	Monitoring Done By	NCL
Equipment Used	SL-4010		
Monitoring Duration	10 MINUTES		
Place Of Monitoring	NEAR MILLING AREA		
Time Of Monitoring	11:00		
Category Of Area	INDUSTRIAL AREA		
Sampling Protocol	CPCB method - PCLS/06/2000-01		

OBSERVATIONS

Observation No.	1	2	3	4	5	6	7	8	9	10
Reading dB(A)	72.9	71.5	72.5	71.6	70.5	70.2	71.6	72.4	73.2	72.6

TEST RESULT

S.No.	Description Noise Level dB(A)	Result	Ambient Noise Standards/ Specification (CPCB/Factories Act) Leq dB(A)
1	Average	71.9	
2	Maximum	73.2	
3	Minimum	70.2	
4	Leq dB(A)	72.1	75 Max.

**** End Of Report****

FOR NEWCON CONSULTANTS & LABORATORIES

INTEKHAB KHAN
(M.Sc. Env. Science)
CHECKED BY

PREPARED BY

AUTHORIZED SIGNATORY

Format no NCL/QSP-26/TC-NOI/FMT-03 Rev.No.01 Date 18.07.2011

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JAS-ANZ
ISO 9001/14001/45001
Reg. No. R191/7381

TEST CERTIFICATE

NOISE MONITORING REPORT

TEST REPORT NO : NCL/DSMM/7311/039/22/03-2021	DATE OF REPORT : 27-03-2021
Name And Address Of Customer	DSM SUGAR MANSURPUR, (A UNIT OF DHAMPUR SUGAR MILLS LTD.) , MANSURPUR,MUZAFFARNAGAR,U.P., INDIA

SAMPLING DETAILS

Analysis Start Date	20-03-2021	Analysis End Date	20-03-2021
Date of Monitoring	20-03-2021	Monitoring Done By	NCL
Equipment Used	SL-4010		
Monitoring Duration	10 MINUTES		
Place Of Monitoring	Production Area		
Time Of Monitoring	12:00		
Category Of Area	INDUSTRIAL AREA		
Sampling Protocol	CPCB method - PCLS/06/2000-01		

OBSERVATIONS

Observation No.	1	2	3	4	5	6	7	8	9	10
Reading dB(A)	70.1	71.4	72.8	69.3	72.1	71.0	67.8	70.9	73.2	71.9

TEST RESULT

S.No.	Description Noise Level dB(A)	Result	Ambient Noise Standards/ Specification (CPCB/Factories Act) Leq dB(A)
1	Average	71.1	
2	Maximum	73.2	
3	Minimum	67.8	
4	Leq dB(A)	71.3	75 Max.

**** End Of Report****

FOR NEWCON CONSULTANTS & LABORATORIES

INTEKHAB KHAN
(Quality Science)
CHECKED BY

PREPARED BY

AUTHORIZED SIGNATORY

Format no NCL/QSP-26/TC-NOI/FMT-03 Rev.No.01 Date 18.07.2011

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TEST CERTIFICATE

NOISE MONITORING REPORT

TEST REPORT NO : NCL/DSMM/7311/040/22/03-2021 DATE OF REPORT : 27-03-2021

Name And Address Of Customer	DSM SUGAR MANSURPUR, (A UNIT OF DHAMPUR SUGAR MILLS LTD.) , MANSURPUR,MUZAFFARNAGAR,U.P., INDIA

SAMPLING DETAILS

Analysis Start Date	20-03-2021	Analysis End Date	20-03-2021
Date of Monitoring	20-03-2021	Monitoring Done By	NCL
Equipment Used	SL-4010		
Monitoring Duration	10 MINUTES		
Place Of Monitoring	Boiler Area		
Time Of Monitoring	11:30		
Category Of Area	INDUSTRIAL AREA		
Sampling Protocol	CPCB method - PCLS/06/2000-01		

OBSERVATIONS

Observation No.	1	2	3	4	5	6	7	8	9	10
Reading dB(A)	72.6	70.2	71.3	73.4	72.6	72.5	71.5	72.9	71.2	73.4

TEST RESULT

S.No.	Description Noise Level dB(A)	Result	Ambient Noise Standards/ Specification (CPCB/Factories Act) Leq dB(A)
1	Average	72.2	
2	Maximum	73.4	
3	Minimum	70.2	
4	Leq dB(A)	72.4	75 Max.

**** End Of Report****

FOR NEWCON CONSULTANTS & LABORATORIES

MUKHTAR KHAN
CHECKED BY (M. Science)

PREPARED BY

AUTHORIZED SIGNATORY

Laboratory : A-1/156, Sector-17, (Swadeshi Compound) Kavi Nagar Industrial Area, GHAZIABAD - 201 002 (U.P.)
Phone No.: 0120-2803115 | Mobile : 9810430345 | Website : www.newconlab.in
E-mail : newconlab@gmail.com, newconlabfinance@gmail.com

Newcon Consultants & Laboratories

An ISO 9001 : 2015, ISO 14001 : 2015, ISO 45001 : 2018 Certified Laboratory
NABL ISO/IEC 17025 : 2017 (Testing, Cert. No. TC-5526) Accreditated Laboratory
Recognised by MOEFCC

Website : www.newconlab.in

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JAS-ANZ
ISO 9001/14001/45001
Reg. No. R191/7391

TEST CERTIFICATE

NOISE MONITORING REPORT

TEST REPORT NO : NCL/DSMM/7311/041/22/03-2021	DATE OF REPORT : 27-03-2021
Name And Address Of Customer	DSM SUGAR MANSURPUR, (A UNIT OF DHAMPUR SUGAR MILLS LTD.) , MANSURPUR,MUZAFFARNAGAR,U.P., INDIA

SAMPLING DETAILS

Analysis Start Date	20-03-2021	Analysis End Date	20-03-2021
Date of Monitoring	20-03-2021	Monitoring Done By	NCL
Equipment Used	SL-4010		
Monitoring Duration	10 MINUTES		
Place Of Monitoring	Near Main Gate		
Time Of Monitoring	12.40		
Category Of Area	INDUSTRIAL AREA		
Sampling Protocol	CPCB method - PCLS/06/2000-01		

OBSERVATIONS

Observation No.	1	2	3	4	5	6	7	8	9	10
Reading dB(A)	65.5	61.8	66.0	63.8	62.9	67.1	64.5	63.7	67.0	67.5

TEST RESULT

S.No.	Description Noise Level dB(A)	Result	Ambient Noise Standards/ Specification (CPCB/Factories Act) Leq dB(A)
1	Average	65.0	
2	Maximum	67.5	
3	Minimum	61.8	
4	Leq dB(A)	65.2	75 Max.

**** End Of Report****

FOR NEWCON CONSULTANTS & LABORATORIES

INTEKHAB KHAN
(M.Sc. Env. Science)
CHECKED BY

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Format no NCL/QSP-26/TC-NOI/FMT-03 Rev No.01 Date 18.07.2011

Laboratory : A-1/156, Sector-17, (Swadeshi Compound) Kavi Nagar Industrial Area, GHAZIABAD - 201 002 (U.P.)
Phone No.: 0120-2803115 | Mobile : 9810430345 | Website : www.newconlab.in
E-mail : newconlab@gmail.com, newconlabfinance@gmail.com

(75)

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

(Original Application No.16 of 2021)

IN THE MATTER OF:

Vinit Kumar ..... **Applicant**

Versus

DSM Sugar Mills Ltd. & Ors. ..... **Respondents**

KNOW ALL to whom these presents shall come that I, Amit Sharma aged about 54 years S/o Sh. Jagdeesh Chandra Sharma working as Senior General Manager (Commercial) with *DSM Sugar Mills Ltd* having its Corporate Office at: 241, Okhla Industrial Estate, Phase – III, New Delhi – 110020 (the Respondent No.1 herein) do hereby appoint:

ANUBHAV ANAND ARON, ABHINAV ANAND (Advocates)
A-901, Apex Golf Avenue, Sector-1, Greater Noida (West), U.P. – 201 3016
Mob: 9811764256; 9582416270
E-mail: abhinav.legal@gmail.com

(Hereinafter called the Advocate) to be my/our Advocate in the above noted case authorize him:-

- To act, appear and plead in the above noted case in this court or in any other Court in which the same may be tried or heard and also in the appellate [illegible] including the High Court subject to payment of fees separately for each Court by me/us.
- To sign, file, verify and present pleadings, appeals [illegible] on review, re[illegible] compromise or other petitio[illegible] ay be deeme[illegible] cution [illegible] to payment [illegible]

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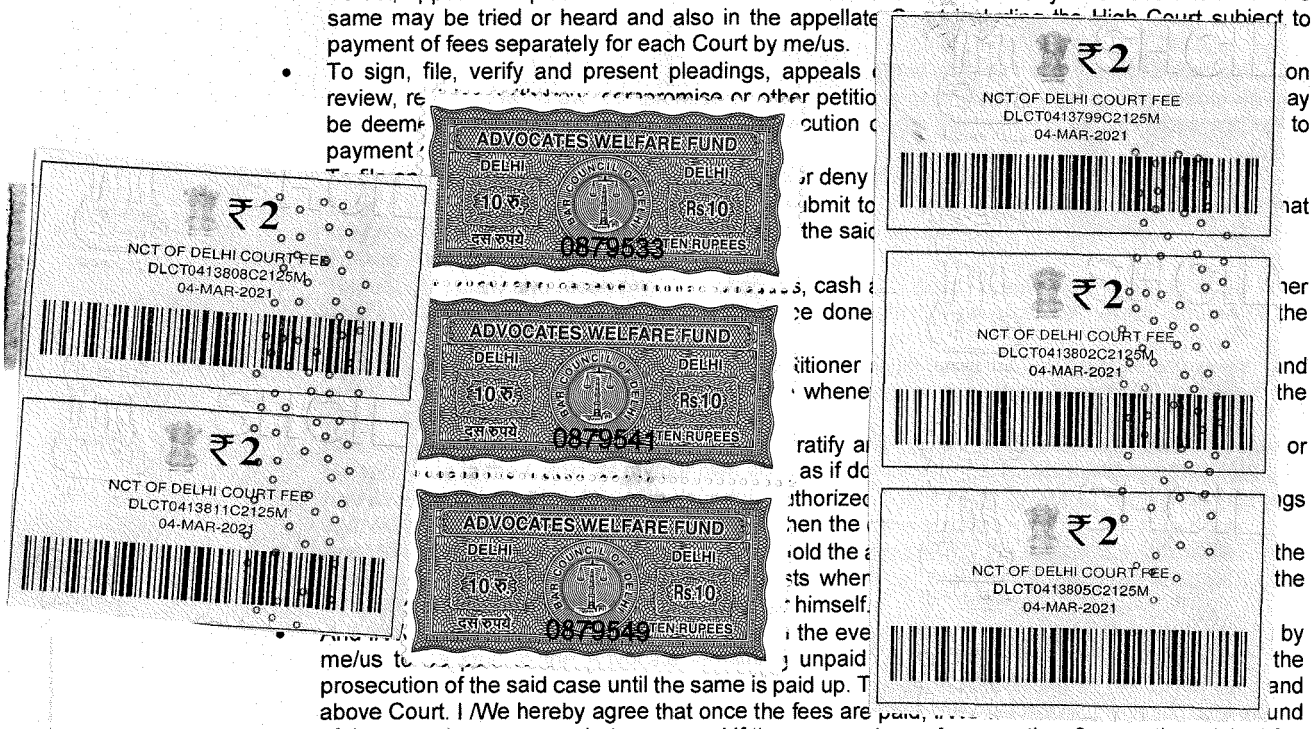
- And he/s[illegible] the eve[illegible] by me/us t[illegible] unpaid [illegible] the prosecution of the said case until the same is paid up. T[illegible] and above Court. I /We hereby agree that once the fees are paid, [illegible] und of the same in any case whatsoever and if the case prolongs for more than 3 years the original fee shall be paid again by me/us.



IN WITNESS WHEREOF I/we do hereunto set my/our hand to these presents the contents of which have been understood by me/us on this 18th day of August, 2021

Accepted subject to the terms of the fees

ANUBHAV ANAND ARON & ABHINAV ANAND
(D/1848/2003) (D/762/2007)
(Advocates)

For Dhampur Sugar Mills Ltd.

Authorised Signatory

Client

Gmail

PROOF OF SERVICE

(76)

Abhinav Anand <abhinav.legal@gmail.com>

Reply /Submission - DSM Sugar Mills Ltd. (O.A. No.16/2021)

1 message

Abhinav Anand <abhinav.legal@gmail.com> Thu, Aug 19, 2021 at 1:29 PM
To: litigation.life@gmail.com, vinitmcm@gmail.com, ccb.cpcb@nic.in, ms@uppcb.com, csup@nic.in, dmmuz@nic.in

Sir /Madam,

Kindly find attached the Reply /Submission to be filed on behalf of the Respondent No.1 i.e. DSM Sugar Mills Ltd. before the Hon'ble National Green Tribunal, New Delhi in the matter of Original Application No.16/2021 titled as "Vinit Kumar vs. DSM Sugar Mills Ltd & Ors".

Regards,

Abhinav Anand
(Advocate)
Mob: 9582416270

Reply (DSM Sugar Mills Ltd) (OA 16 of 2021).pdf
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