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**ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਰੋਕਥਾਮ ਬੋਰਡ**  
**PUNJAB POLLUTION CONTROL BOARD**  
**ਖੇਤਰੀ ਦਫਤਰ, ਅੰਮ੍ਰਿਤਸਰ**  
**ਪਤਾ: ਪਲਾਟ ਨੰਬਰ 164, ਫੋਕਲ ਪੁਆਇੰਟ, ਅੰਮ੍ਰਿਤਸਰ।**



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ਮਿਤੀ ..21/11/23.

To

The Consultant Judicial  
 National Green Tribunal,  
 Faridkot House, Copernicus Marg,  
 New Delhi-110001.

**Subject: Filing of Joint Committee report in O.A No. 470 of 2023 Public Action Committee and Others v/s State of Punjab and Others in compliance to order dated 10.8.2023.**

The Hon'ble National Green Tribunal was pleased to constitute a Joint Committee consisting of one representative of State Pollution Control Board, one representative of Central Pollution Control Board and one representative of Collector / DM, Amritsar vide order dated 10.8.2023 with a direction to submit Factual and Action Taken Report. The State Pollution Control Board was nominated nodal agency for coordination and compliance.

- 2) The Joint Committee comprising of Sh. Nikas Kumar, IAS, SDM, Amritsar-II; Sh. J P Meena, Scientist-D, CPCB and Er. Sukhdev Singh, EE, PPCB, RO, Amritsar visited the unit on 20.10.2023 and prepared the report.
- 3) The Joint Committee report is hereby submitted in compliance to order dated 10.8.2023 for kind perusal and consideration of the Hon'ble Tribunal.

*Sukhdev Singh*  
 21/11/2023  
 (Sukhdev Singh)

**Environmental Engineer,  
 Punjab Pollution Control Board,  
 Regional Office, Amritsar**

**Report of the Joint Committee in compliance of the orders of Hon'ble NGT dated 10/08/2023, in the matter of O.A. No. 470 of 2023; (Public Action Committee & Ors V/s State of Punjab & Ors) - M/s Amar Color Chem (India), Plot No. 26, Focal Point, Amritsar.**

**1.0 Preamble**

That the industry M/s Amar Color Chem (India), Plot No. 26, Focal Point, Amritsar is a small scale red category industry and is in operation since 1997 in approved industrial zone i.e. Focal Point, Amritsar. The industry is engaged in manufacturing of basic dyes, glycerine, benzaldehyde and dyes methyl aniline using Oil Green, Oil Yellow & other chemicals such as Ortho toluidine, Mono chlorobenzene & acids as raw material. Earlier consent under Water Act, 1974 and Air Act, 1981 were granted to industry upto 30.06.2020 with certain terms and conditions. Complaints against industry regarding acidic fumes/harmful gases and discharge of untreated effluent is being received in the Board and accordingly board has taken action against the industry time to time. Now, a complaint has filed by Public Action Committee & Ors before the Hon'ble National Green Tribunal, New Delhi alleged that the industry is running on ZLD but has been damaging the environment by releasing toxic gases, fugitive fumes in ambient air as well as discharging harmful effluents in the domestic sewer illegally and in a very unscientific way, resulting in serious health related problems for residents, for workers of factory and public at large.

**2.0 Earlier Order of the Hon'ble NGT dated 05.03.2021**

While disposing the O.A. No. 938/2019 vide order dated 05.03.2021, the respondent no. 5 in present OA was found violating environmental norms in the following manner: -

*One number of industry namely M/s Amar Color Chem (India), Plot No. 26, Focal Point, Amritsar against whom regular complaints were being received was found violating the provisions of Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution) Act, 1981. Accordingly, directions were issued for closure of the unit."*

The contention of the Learned Counsel for the applicant is that though the industry is running on ZLD but has been damaging the environment by releasing toxic gases, fugitive fumes in ambient air as well as discharging harmful effluents in the domestic sewer illegally and in a very unscientific way, resulting in serious health related problems for residents, for workers of factory and public at large.



### 3.0 Order of the Hon'ble NGT dated 10.08.2023:

The Hon'ble National Green Tribunal (NGT), vide order August 10, 2023 constituted a joint committee of three members comprising of One representative from State Pollution Control Board, Punjab, One representative from the CPCB and One representative from Collector /DM, Amritsar. The Committee is directed to visit the place and submit the factual and action taken report on extent of violation and reasons for not taking action under Water Act, 1974 and Air Act, 1981 within four weeks. The State PCB will be the nodal agency for coordination and compliance. It has directed by the Hon'ble NGT in the order dated 10/08/2023, as follows: -***"We deem it just and proper to call a report on the matter in issue in present Original Application, from a Joint Committee constituted on the above cited matter.***

### 3.1 Constitution of the Joint Committee:

In compliance to Hon'ble NGT order committee comprising of the following members was composed

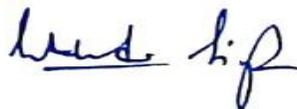
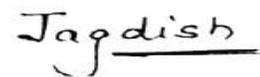
1. Sh. Nikas Kumar, IAS, SDM, Amritsar-II (Nominated by District Magistrate, Amritsar)
2. Sh. J P Meena, Scientist-D, CPCB (Nominated by CPCB, RD, Chandigarh)
3. Er. Sukhdev Singh, EE, PPCB, RO, Amritsar (Nodal Officer, nominated by PPCB)

### 3.2 Scope of the Committee

The committee has been vested with mandate to visit and inspect the site in question and vested with following scope vide order dated 10.08.2023.:

1. Brief process description of Oil Green, Oil Yellow product
2. Major raw material and its daily consumption
3. Statutory requirement
4. Inspection Questionnaire

The Committee is directed to visit the place and submit the factual and action taken report on extent of violation and reasons for not taking action under Water Act, 1974 and Air Act, 1981 within four weeks. The State PCB will be the nodal agency for coordination and compliance".

#### 4.0 Statutory Requirement:

All statutory requirements as per the respective Acts and Rules made there under of the concerned authorities. A brief assessment of the same is as under:

S.No	Statutory Requirement	Status in the Plant
1.0	Statutory requirements of Punjab Pollution control Board	Consent to Operate under the Water (Prevention & Control of Pollution) Act, 1974 is valid upto The Consent to Operate under Air (Prevention & Control of Pollution) Act, 1981 valid upto. Authorization under Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.
2.0	Fire safety Certificate / NOC from Punjab Fire Services.	Not submitted by the industry
3.0	Statutory requirements of Punjab Factories Rules	The industry has obtained license vide registration no. ASR0FL9849 under the provisions of Factory Act, 1948.
4.0	Certification from Punjab Water Regulation & Development Authority.	Not submitted by the industry
5.0	Building Plan approved from the Director of Factories, Punjab under the Factory Act, 1948.	The industry has obtained license vide registration no. ASR0FL9849 under the provisions of Factory Act, 1948.
6.0	Statutory requirements of the Public Liability Insurance Rules, 1991	Not submitted by the industry
7.0	Statutory requirements of petroleum & Explosives safety Organization (PESO)	Not submitted by the industry
8.0	Certification from Excise and Taxation Department regarding issuance of GST number.	GST No. 03AACFA0128R1ZO

**Feedback Received from Complainant :** On the day of visit, committee interacted with the complainant. The complainant informed that presently the unit is not releasing toxic gases, fugitive fumes in ambient air as well as discharging harmful effluents in the domestic sewer illegally and in a very unscientific way, fumes into the atmosphere.

#### 5.0 Site visited by the Joint committee

The joint Committee was directed by Hon'ble NGT to visit the place and submit the factual and action taken report on extent of violation. Accordingly, in compliance of the directions, the Joint Committee visited the site i.e M/s Amar Colour Chem Pvt. Ltd., Plot No. 26, Focal Point, Mehta Road, Amritsar on dated 20/10/2023, to verify the compliance of various environmental norms applicable to the industry. The salient observations and remedial suggestions of the committee is presented below:



**Salient Observations:**

1. The unit is involved in batch wise standardization operation of dyes for further processors application needs. However, the unit reportedly manufacturing of basic Dyes Oil Yellow @100 kg/day, Oil Green @ 100 kg/day using glycerine, benzaldehyde and dyes methyl aniline and other chemicals such as Ortho toluidine, Mono chlorobenzene & acids as raw material.
2. The unit meets its water requirement through one Bore well for industrial and domestic purpose. Mechanical type water meter installed at bore well and log book of the same was not maintained.
3. The unit has not obtained permission from Central Ground Water Authority (CGWA)/ PWRDA for ground water abstraction.
4. The unit has provided separate two reactor vessels for Processing of the oil yellow & Oil Green dyes standardization.
5. Committee observed that Work Zone Area of green dye stuff has not provided adequate ventilation arrangement as well as fugitive emission control system.
6. On the day of visit, the unit was found operational However, Other treatment units of the ETP were found empty and dried which indicated that the flowing of stream from process is not produced since long times. although, only Aeration tanks of ETP were found operational for maintaining the biomass.
7. As informed by the unit representatives, no effluent is generated from this process although, a small quantity effluent generated infrequently in floor washing of the work area, cleaning and washing of reactor vessel and its floor, that effluent is enrouted to existing ETP for treatment. However, logbook of the same was not maintaining.
8. Committee observed the unit is not adopting closed loop system for feeding of the raw material into the reaction vessel along with carry out the semi-finished product through open channel.
9. The unit has installed an ETP which is based on physico-chemical followed by Biological process. The ETP comprises of Bar Screen > Oil & Grease Chamber > Equalization Tank > Chemical Dozing > Flocculation Tank > Primary Tube Settler > MBBR-1 > MBBR-2 > Secondary Tube Settler > Pre-filtrations tank > Pressure Sand filter > Dual Media filter > Activated Carbon Filter □ Final Outlet.
10. On the day of visit, there was no discharge of the effluent from the ETP.
11. At the time of visit of the team the ETP was not in operation only aeration in MBBR-1 and MBBR-2 (Aeration Tank-I, Aeration Tank-II 2) were operational. Effluent samples were collected from MBBR-1 and MBBR-2 (Aeration Tank-I & Aeration Tank-II). Sample were sealed in the presence of





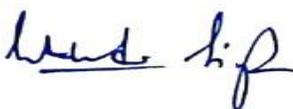
Sh. Rohit Handa, Partner and sample were sent to the Board's Lab at Head Office, Patiala for analysis MLSS and MLVSS.

12. On the day of visit, committee observed that all treatment units of ETP were found empty and dry except aeration tank of ETP. On the day of visit, committee had taken samples from Aeration tank (MBBR Tank-1 & MBBR Tank-II) of ETP to assess stabilized of the bio-mass.

Sampling Location	MLSS	MLVSS
Aeration Tank-I	2280	1710
Aeration Tank-II	960	680

All Values are in mg/l

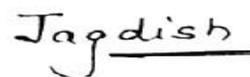
13. The unit has installed OCEMS at final outlet of ETP for measuring consented meter pH, TSS, COD, BOD, flow meter. On the day of visit, the OCEMS were not showing on line value due to not generation of the effluent.
14. The unit has not maintained any records of the quantity of effluent generation, treated effluent discharged and quantity of ETP sludge generated.
15. Committee observed that the unit kept various hazardous chemical in their premise namely Acetic acid, Sulphuric acid, Oxalic acid without valid registration/permission for trading these chemicals at the adjacent textile units.
16. The unit has installed 02 no. reaction vessels from manufacturing of Oil Yellow at second floor of its production area. The reaction vessels are attached with wet alkaline scrubber provided as APCD at second floor for scrubbing gases being generated from the process during reactions. Wet scrubber installed by the unit was in operation at the time of visit.
17. The unit has also installed storage vessels at the second floor of production area for the purpose of storage of raw material as well as intermediate products. All storage vessels are also connected with wet alkaline scrubber provided at Second floor.
18. The unit has installed storage vessels at first floor of the production area. All storage vessels are connected with wet alkaline scrubber provided at second floor.
19. The unit has installed 01 Grinder at ground floor for grinding of intermediate product. The unit has also installed 01 Centrifuge machine for extraction of crystalline material from its process. As informed by the unit representative, Liquid (mother liquor) being generated from the centrifuge process is being reuse in the process.

20. The unit has installed one filter press and same was found in non-operational condition.
21. The unit has not put up proper display board at the entrance gate as per the Hon'ble supreme court order in WP 657/1995.
22. It was observed that workers are not using personal protective equipments (PPEs) for their Health & Safety i.e. Gum Boot, Mask Safety belt etc.
23. The unit has not installed adequate firefighting arrangements in their plant premise i.e. Hose Reel system, Fire Hydrant system, Sand buckets, Portable Fire Extinguishers, Electrical/manual siren for emergency/ accident situation.
24. The unit had been kept used drums and barrels as well as various raw chemical of MS drums/plastic containers in open area of the unit premise.
25. The unit possesses consolidated consents valid upto 31.12.2023 under the Water Act-1974 and the Air Act-1981 whereas Authorization has not obtained under the Hazardous and Other Wastes (Management, & Trans boundary Movement) Rules, 2016 from PPCB.
26. Committee observed that the unit has not provided separate system for discharge of the storm water.
27. The unit has not taken public liability insurance policy.
28. The unit has not prepared on-site /off-site emergency plan of the plant area.
29. Over all housekeeping of the plant process area was found poor.

**Suggestions:**

1. The committee suggests that local administration /PPCB should keep stringent surveillance to discharge of the effluent in addition to releasing toxic gases and fugitive fumes in ambient air as well as discharging harmful effluents in the domestic sewer illegally.
2. The unit should obtain permission from Central Ground Water Authority (CGWA)/ PWRDA for ground water abstraction.
3. The unit should install electromagnetic flow meter in place of. Mechanical type water meter at tube well and log book of the same was maintained.
4. Emergency preparedness plan based on the hazard identification and risk assessment and disaster management plan should be implemented in the unit.
5. The unit should obtain valid registration/NOC permission from concerned SPCB for trading of hazardous chemical in their premise namely Acetic acid, sulphuric acid, oxalic acid etc.



6. The unit should obtain authorization under the Hazardous and Other Wastes (Management, & Trans boundary Movement) Rules, 2016 from PPCB for disposal of Used drums/containers, ETP sludge, process residue and expired chemicals.
7. The unit should be taken public liability insurance policy.
8. The unit should prepare on site /off site emergency plan of the plant area.
9. Over all housekeeping of the plant process area should be improved.
10. Leakage and spillage in the process needs to be improved.
11. The unit should install adequate firefighting arrangements in their plant i.e. Hose Reel system, Fire Hydrant system, Sand buckets, Portable Fire Extinguishers, Electrical/manual siren for emergency/ accident situation.
12. The unit should carry out regularly occupational health checkup of engaged workers and records of the same was maintained.
13. The unit should maintain proper ventilation system in the work Zone by providing proper exhaust along with filter and duct in the process area of green dye stuff.
14. The unit should put up proper display board at the entrance gate as per the Hon'ble supreme court order in WP 657/1995.

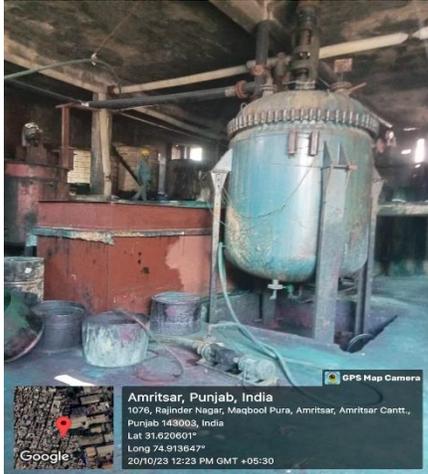
**Joint committee members:** As per order of Hon'ble National Green Tribunal, Principal Bench, New Delhi

Name & Designation	Institute	Signature
Sh. Nikas Kumar, IAS SDM	Amritsar-II (Nominated by District Magistrate, Amritsar)	
Sh. J P Meena, Scientist-D,	CPCB (Nominated by CPCB, RD, Chandigarh)	
Er. Sukhdev Singh, EE,	PPCB, RO, Amritsar (Nodal Officer, nominated by PPCB)	

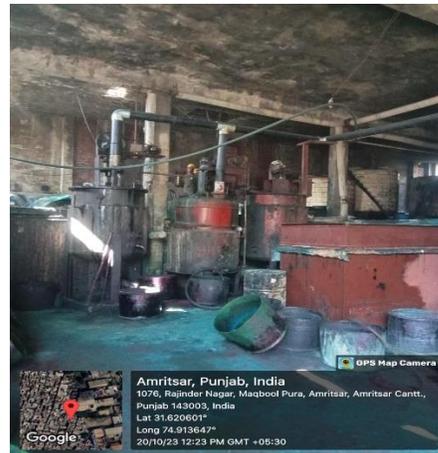
Photographs Taken during Visit of M/s Amar Color Chem (India), Plot No. 26, Focal Point, Amritsar

Annexure-A

Plate-1:- Photographs 1,2,3 showing area of Oil Green Manufacturing section



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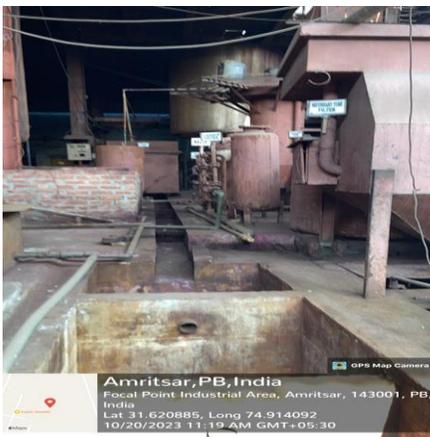


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Plate-2:- Photographs 4,5,6,7 showing empty and dry components of ETP



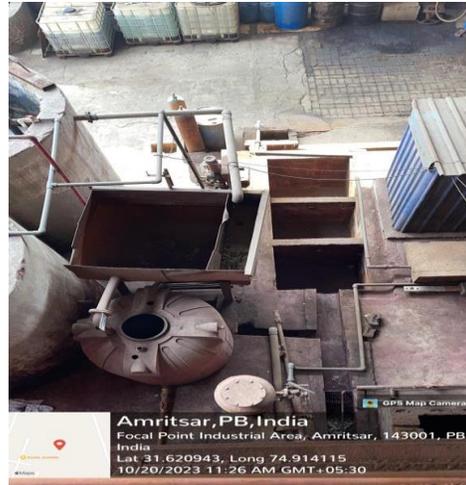
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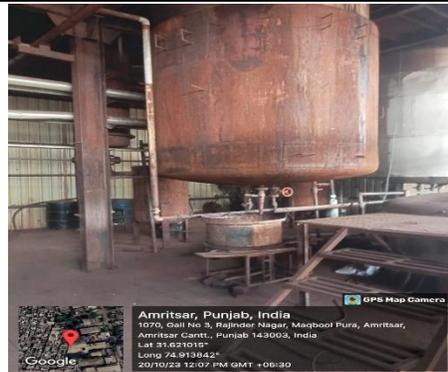
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**Plate-3:-** Photograph 8 showing aeration tank – 1 and 2 of ETP which found operational



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**Plate-4 :-** Photograph 9 showing reaction vessel without closed loop system for handling material



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**Plate-5 :- Photographs 10,11,12,13,14 showing various hazardous chemical kept in premises of the industry for trading purpose**



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**Plate-6 :- Photograph 15 showing wet scrubber and photograph 16, 17 showing reactor /storage vessel installed by the industry**



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16



17

**Plate7 :- Photograph 18 showing centrifuge machine for extaction of crystalline material**



18

**Plate 8 :- Photograph 19 showing improper display board at enternace gate of the industry**



19

**Plate 9 :- Photograph 20,21 showing member of team at the time of visiting industry**



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