

**BEFORE THE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH AT NEW
DELHI**

Original Application No. 225/2022

Nitin Dhiman

Applicant

Versus

State of Punjab & Ors.

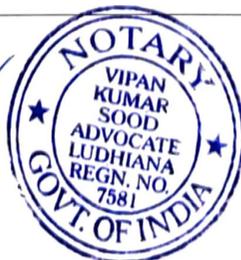
Respondent(s)

And other connected matters

INDEX

Sr. No.	Particulars	Page No.
1.	Short reply by way of affidavit of Er. Jaspal Singh, Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana on behalf of Punjab Pollution Control Board in compliance to order 22.07.2025.	1-7
2	Annexure-A Imposition of Environmental Compensation and status of its recovery: 50 MLD CETP, Tajpur Road, Ludhiana.	8
3	Annexure-B The orders passed by the Board for imposition of Environmental Compensation upon 50 MLD CETP are collectively enclosed.	9 - 51
4	Annexure-C Imposition of Environmental Compensation and status of its recovery: 40 MLD CETP, Tajpur Road, Ludhiana.	52
5	Annexure-D The orders passed by the Board for imposition of Environmental Compensation upon 40 MLD CETP are collectively enclosed.	53 - 65

10205
30/9/2024



6	Annexure-E Imposition of Environmental Compensation and status of its recovery: 15 MLD CETP, Bahadur Ke Road, Ludhiana.	66
7	Annexure-F The orders passed by the Board for imposition of Environmental Compensation upon 15 MLD CETP are collectively enclosed.	67-97
8	Annexure-G A copy of letter no.31908 dated 12.09.2024 vide which study of "Source Apportionment and Comprehensive Investigation of Pollution in Buddha Dariya" was awarded to IIT, Ropar.	98 - 102

Date: 30/9/2025

Place: Ludhiana



(Jaspal Singh)
Environmental Engineer
Punjab Pollution Control Board,
Regional Office-3, Ludhiana
(On behalf of Punjab Pollution
Control Board)

10205
30/9/2025



**BEFORE THE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH AT NEW
DELHI**

Original Application No. 225/2022

Nitin Dhiman

Applicant

Versus

State of Punjab & Ors.

Respondent(s)

WITH

Original Application No. 546/2024

News item titled "Ludhiana PCB report flags 54 dyeing units in Buddha Nullah's catchment" appearing in the Hindustan Times dated 25.04.2024

WITH

Appeal No. 40/2024

Punjab Dyers Association Tajpur road Ludhiana

Appellant

Versus

Punjab Pollution Control Board & Ors.

Respondent(s)

WITH

Appeal No. 41/2024

M/s Punjab Dyers Association (Focal Point Module)

Appellant

Versus

Punjab Pollution Control Board & Ors.

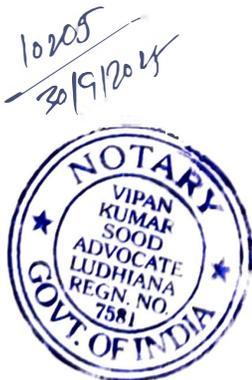
Respondent(s)

WITH

Appeal No. 48/2024

Bahadur Ke Textiles & Knitwears Association

Appellant



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Versus

Punjab Pollution Control Board & Ors.

Respondent(s)

WITH

Appeal No. 51/2024

M/s Punjab Dyers Association (Focal Point Module)

Appellant

Versus

Punjab Pollution Control Board & Anr.

Respondent(s)

WITH

Original Application No. 1325/2024

WITH

Execution Application No. 46/2025

In

Original Application No. 1325/2024

WITH

Original Application No. 1326/2024

WITH

Execution Application No. 45/2025

In

Original Application No. 1326/2024

WITH

Original Application No. 1327/2024

WITH

Execution Application No. 42/2025

In

Original Application No. 1327/2024

Public Action Committee & Ors.

Applicant(s)

Versus

Union of India & Ors.

Respondent(s)

WITH

Appeal No. 18/2025



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Punjab Dyers Association

Appellant

Versus

Punjab Pollution Control Board & Ors.

Respondent(s)

WITH

Appeal No. 20/2025

Bahadur Ke Textiles and Knitwear's Association

Appellant

Versus

Punjab Pollution Control Board & Anr.

Respondent(s)

Short reply by way of affidavit of Er. Jaspal Singh, Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana on behalf of Punjab Pollution Control Board in compliance to order 22.07.2025.

I, the above-named deponent, do hereby, solemnly affirm and state as under:

Respectfully Showeth:

1. That briefly submitted, the issue relating to the functioning of Common Effluent Treatment Plants (CETPs) installed and operated by the textile and dying industries at Ludhiana is under consideration of the Hon'ble National Green Tribunal in various cases filed by the Special Purpose Vehicles (SPV) of the Common Effluent Treatment Plants (CETPs) and the opposing party namely the Public Action Committee of Ludhiana.

That the deponent is presently working as Environmental Engineer in the Punjab Pollution Control Board and is posted in the Regional Office-3, at Ludhiana. The deponent is well conversant with the facts of the case and is competent and authorized to swear and file the present short reply by way of affidavit on behalf of the Punjab Pollution Control Board.



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3. That the Hon'ble Tribunal was pleased to club all the cases relating to the operation and functioning of Common Effluent Treatment Plants of 15 MLD, 40 MLD and 50 MLD at Ludhiana for hearing and disposal.
4. That the respondent Punjab Pollution Control Board is filing replies/ status reports in the above-mentioned cases from time to time in accordance with the directions of this Hon'ble Tribunal. A short reply dated 18.07.2025 was earlier filed by the deponent in the above-mentioned cases disclosing the action by the Punjab Pollution control Board against the non-complying CETPs, including the imposition of Environmental Compensation. After the consideration of the matter, this Hon'ble Tribunal was pleased to pass an order dated 22.07.2025 thereby directing the Punjab Pollution Control Board to place on record the details relating to the calculations of Environmental Compensation and the status of its recovery. The Hon'ble Tribunal was also pleased to direct the Board to place on record the details of the actionable plan provided by the IIT, Ropar. The relevant extract of paragraph 5, 6 and 11 of the order dated 22.07.2025 is reproduced here in below for kind perusal and reference:

5. PPCB is directed to place on record the full details relating to the calculation of environmental compensation and status of its recovery.

6. Learned Counsel appearing for PPCB has also submitted that now a comprehensive plan is being prepared by PPCB for remediating the problem and IIT, Ropar has been taken on board and has been assigned the responsibility to remediate the problem.

11. Learned Counsel for PPCB has submitted that the timeline for actionable plan provided by IIT, Ropar, along with details of the actionable plan, will be placed on record by PPCB within one week.



A handwritten signature in blue ink, consisting of stylized initials and a surname, located at the bottom right of the page.

5. That in compliance to order dated 22.07.2025, it is submitted that the Board has imposed Environmental Compensation from the date of the inception of the Common Effluent Treatment Plants of 50 MLD, 40 MLD and 15 MLD capacity by issuing various orders. The Environmental Compensation for the period of violation has been imposed in accordance with the formula and methodology evolved by the Central Pollution Control Board and adopted by the Punjab Pollution Control Board. The detail of the Environmental Compensation imposed by the Board on the Common Effluent Treatment Plants (CETPs) and the status of its recovery has been tabulated and is enclosed here with as per the following Annexures.

i. **Annexure A:**

50 MLD CETP being operated by Punjab Dyers Association (Tajpur Road Module) situated at Tajpur Road, Ludhiana-

Annexure-B

Various orders passed by the Board for imposition of Environmental Compensation upon 50 MLD CETP have been collectively enclosed.

ii. **Annexure C.**

40 MLD CETP being operated by Punjab Dyres Association (Focal Point Module) situated at Tajpur Road, Ludhiana

Annexure-D

Various orders passed by the Board for imposition of Environmental Compensation upon 40 MLD CETP have been collectively enclosed.

iii. **Annexure-E**

15 MLD CETP being operated by Bahadur Ke Textile and Knitwear Association situated at Bahadur Ke Road Ludhiana.

Annexure F

Various orders passed by the Board for imposition of Environmental Compensation upon 15 MLD CETP have been collectively enclosed.

6. That in further compliance to order dated 22.07.2025 of this Hon'ble Tribunal it is submitted that the with an endeavor to rejuvenate Buddha Dariya, after deliberations with the High-level Committee and other stake holder departments, the Government of Punjab through Punjab Development



10905
22/9/2024

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Commission and the Punjab Pollution Control Board has awarded the study of "Source Apportionment and Comprehensive Investigation of Pollution in Buddha Dariya" to IIT, Ropar at the cost of Rs. 1,44,38,600/- + GST which aims to provide Scientific foundation for River Rejuvenation efforts in the State and will enable regulators, industries, and local bodies to implement targeted interventions, strengthen compliance monitoring, and restore the ecological and socio-economic value of Buddha Dariya and the downstream River Sutlej. The objectives of the study are mentioned below:

- a) Identifying and quantifying pollution sources (domestic sewage, industrial effluent, dairy waste, municipal solid waste, and unauthorized discharges.
 - b) Assessing the performance of existing treatment infrastructure (CETPs, STPs, CBG plants, ETPs, re-processors.
 - c) Developing a data-backed source apportionment of the pollution levels in Buddha Dariya across major authorized and unauthorized sources.
 - d) Providing high-level short-term and long-term interventions for the rejuvenation of Buddha Dariya.
7. That the Indian Institute of Technology, Ropar will complete the study by 31.03.2026 as per the timelines mentioned in letter no. 31908 dated 12.09.2024, a copy of which is enclosed as **Annexure G**.
 8. That the deponent may kindly be allowed to place on record the present short reply in compliance to order dated 22.07.2025 the above-mentioned cases on behalf of Punjab Pollution Control Board.

10205
20/9/2025

Date: 30/9/2025

Place: Ludhiana

Deponent



(Jaspal Singh)
Environmental Engineer
Punjab Pollution Control Board,
Regional Office-3, Ludhiana
(On behalf of Punjab Pollution
Control Board)



Verification

Verified that the contents of the above Affidavit are true and correct to the knowledge of the deponent as derived from the official record. No part of the above affidavit is false and nothing material is kept concealed therein.

Certified that the affidavit/SPA/GPA has been read over & explained to the deponent/executant who seemed directly to understand the same at the making thereof

Date: 30/9/2025

Place: Ludhiana

Deponent



(Jaspal Singh)
Environmental Engineer
Punjab Pollution Control Board,
Regional Office-3, Ludhiana
(On behalf of Punjab Pollution
Control Board)



I know the Deponent/Executant personally and He/She has Signed/Thumb Impression in my presence.

ATTESTED AS IDENTIFIED

NOTARY PUBLIC
LUDHIANA (PB.) India

10205
30/9/2025

gare 30/9/2025

Imposition of Environmental Compensation and status of its recovery: 50 MLD CETP, Tajpur Road, Ludhiana

Date of commissioning of CETP	Total Period for which EC has been Imposed	Detail of Orders vide which EC was imposed	Total Amount of EC imposed (in Rs.)	Amount of EC Recovered (in Rs.)
June, 2022	09.06.2022 to 06.05.2025	i. Order no. 383 dated 04.09.2024 for Rs. 1,24,50,000/- ii. Order no. 380 dated 03.09.2024 for Rs. 25,00,000/- iii. Order no. 465 dated 27.11.2024 for Rs. 58,80,000/- iv. Order no. 513 dated 31.12.2024 for Rs. 41,60,000/- v. Order dated 412 dated 11.09.2025 for Rs. 69,00,000/-	3,18,90,000/-	NIL

Note:

1. The Environmental Compensation imposed by the Board has been calculated in accordance with the formula and methodology evolved by the Central Pollution Control Board.
2. The Punjab Dyers Association, Tajpur Road, Ludhiana has been requested in the hearings held on 06.05.2025 and 10.07.2025 to deposit the amount of Environmental Compensation with the Board.
3. Letter no. 5257 dated 8.09.2025 has been written to Deputy Commissioner Ludhiana for effecting the recovery of the amount of Environmental Compensation as arrears of Land revenue.
4. The Punjab Dyers Association has filed appeal no. 18 of 2025 before The Hon'ble National Green Tribunal against the orders passed by the Punjab Pollution Control Board of imposition of Environmental Compensation.
5. The orders mentioned above are collectively been enclosed as **Annexure-B**.



ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਕੰਟਰੋਲ ਬੋਰਡ
PUNJAB POLLUTION CONTROL BOARD

No. 383

Dated. 04/9/24

Subject: Imposition of Environmental Compensation upon CETP of 50 MLD capacity installed at Tajpur Road, Ludhiana for violation of the provisions of Environmental Laws.

Order

The Punjab Pollution Control Board being the statutory regulatory authority is implementing the provisions of the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 and the rules made there under in the State of Punjab. The main objective of the Board is maintaining or restoring the wholesomeness of water, the preservation of the quality of air and the protection and improvement of the environment.

2) The Ministry of Environment, Forest & Climate Change (MoEF&CC), Government of India has declared various clusters in the Country as Critically Polluted Areas (CPA), Severely Polluted Area (SPA) based on Cumulative Environmental Pollution Index (CEPI) score. Due to increased industrialization, activities of the Industrial units and some other identical reasons, Ludhiana city has been declared as Critically Polluted Area by the Central Pollution Control Board.

3) Briefly stated that the Punjab Dyers Association (PDA) Ludhiana has setup a Common Effluent Treatment Plant (CETP) of capacity 50 MLD for treatment of waste water from the cluster of textiles dyeing industries located at Tajpur Road, Ludhiana. The Special Purpose Vehicle (SPV) was granted consent to operate under Water (Prevention & Control of Pollution) Act, 1974, vide no. CTOW/Fresh/LDH3/2022/18475759 dated 23.08.2022, valid upto 22.08.2023.

4) The SPV has laid separate conveyance system for carrying waste water from the dyeing industries to CETP of capacity 50 MLD.

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- 5) A complaint regarding incoming of colored dyeing effluent at the inlet of newly installed STP 225 MLD, Tajpur Road, Ludhiana was received. To verify and identify the reason of incoming of this coloured effluent the area of Tajpur Road, Ludhiana was visited on 25.04.2023 jointly by the officers of the Board and Municipal Corporation, Ludhiana. An overflow occurred in the PDA sewer manhole (leading to CETP 50 MLD) located opposite to PSPCL sub-station at Tajpur Road, Ludhiana, which was being stagnated near the Municipal Corporation, Ludhiana manhole. The overflow effluent at the said location was not entering into MCL sewer. However, after further excavation of around 20-25 feet towards Buddha Nallah by JCB machines, an old sewer manhole of MCL was found. This MCL manhole was covered with sand and it was opened with the help of JCB and coloured and hot effluent was seen in this manhole.
- 6) After further excavation 01 manhole of old sewer line was detected which was earlier used to discharge the treated trade effluent of the dyeing industries and nearby area located at Bhamian Road to the STP Jamalpur. This network was closed after the establishment of the CETP 50 MLD. It was found that one new manhole of depth around 5-6 feet was constructed through which the coloured effluent was being discharged into the said MCL manhole from the top side after breaking its wall.
- 7) To verify whether this discharge is either by an individual dyeing unit or from the overflow from PDA line located near to it, the main gate of CETP were closed. When CETP door was closed even for short time of 5 to 10 minutes, the coloured and warm dyeing effluent was found coming back in the MCL manhole, after over flow from the old sewer manhole constructed near to it. The over flow was further leading to STP 225 MLD Jamalpur. The colour and nature of the effluent observed by over flowing of effluent in the MCL manhole, old sewer line and new PDA line was same.
- 8) The Joint team continued its work on 26.04.2023 and called the director of the PDA & the member industries of Bhamian Kalan at site. It was found that one overflow line has been provided from the new PDA conveyance line (backside MCL workshop) to the old sewer manhole, which was leading to MCL sewer as found on 25.04.2023. The dyeing effluent was



also seen back through this overflow to the old said sewer manhole. The visit report was also signed by the director of PDA and member units.

9) It was concluded that the above overflow channel was being used by SPV for the discharge of excess trade effluent/ back flow to MCL sewer manhole, which further lead to STP Jamalpur.

10) As dedicated line from Bhamian Kalan to CETP 50 MLD has been newly constructed. Hence, it is apprehended that the PDA Tajpur Road has intentionally laid down this bye pass arrangement. This overflow line was got dismantled with the help of JCB at site in the presence of visiting officers, director of PDA and industrial representative to avoid/ stop any further bye pass and discharge. There is change in the network of PDA pipeline leading to CETP 50 MLD as compared to earlier network map of the SPV. The SPV has changed its pipe network leading CETP without giving any intimation and approval from the Board in this area near Jaswal complex.

11) The team also observed that 01 SBR reactor of CETP 50 MLD was under maintenance and avg. Incoming of effluent at CETP is around 32-35 MLD. Hence, there are chances excess effluent was being bye passed through above identified channel.

11) The SPV has provided the EMF meters at the inlet and outlet of the CETP and same were not connected with the SCADA / online system. The SPV and individual member units has not provided EMF meter enabled with SCADA / online system at inlet of ground water extraction, despite of commitment given by the SPV while de-sealing of the machines of dyeing units. In absence of proper SCADA / online meter at the inlet of industries water balancing is not possible and there will be chances of bye-pass through unauthorized mode of disposal as identified above.

12) The CETP 50 MLD is also being monitored on monthly basis. As per the analysis reports, it was revealed that CETP is achieving the standards of MoEF&CC except TDS, but it is not achieving prescribed standards as prescribed in DPR of CETP. Further, the SPV has not taken any step regarding installation of additional component at CETP to control the TDS.

13) The SPV has neither constructed a proper outlet before discharge into Buddha Nallah, from where effluent sample can be collected nor installed one set of additional OCEMS



at the said location. The SPV has yet not submitted the feasibility report for discharge of treated effluent onto land for irrigation as per the decision of the Competent Authority of the Board as per the decision of Competent Authority taken during hearing dated 25.07.2022. Hence, the SPV is not complying with the decisions of personal hearing before Chairman of the Board dated 25.07.2022.

14) The SPV has not submitted adequacy certificate of the conveyance system provided at site from the Department of PWSSB as per directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 vide Board letter no. 4888-89 dated 18.07.2022.

15) The CETP 50 MLD was monitored in month of April, 2023 and May, 2023. As per the analysis reports, the CETP is achieving the standards as prescribed by MoEF&CC, but it is not achieving prescribed standards as prescribed in DPR of CETP.

16) A meeting of Vidhan Sabha Committee was held on 08.06.2023 in the Circuit House, Ludhiana and the committee visited the site of STP 225 MLD located at Jamalpur and CETP of capacity 15 MLD, Bahadurke Road & 50 MLD located at Tajpur Road, Ludhiana. During visit to the CETP of capacity 50 MLD, the Committee checked the quality of the treated effluent visually and was not fully satisfied from the quality of the said treated effluent. Accordingly, samples were collected by the Committee as well as by the Board. The samples collected by the Board have been sent to the PBTI, Mohali for analysis of various parameters and the results, the CETP is achieving the standards as prescribed by MoEF&CC except TDS, but it is not achieving prescribed standards as prescribed in DPR of CETP.

17) Also, stagnation of coloured dyeing effluent was found on 15.06.2023 in a plot located near M/s Lotus Clothing, Kakka Road Tajpur Road, Ludhiana. This stagnation was occurred due to overflow from the PDA Tajpur Road Manhole of line carrying effluent to the CETP 50 MLD at above said location.

18) A complaint was received on 19.07.2023 regarding colored effluent being received at the inlet of STP of 225 MLD located at Tajpur Road, Ludhiana. Accordingly, a joint inspection was carried out by the Officers of PPCB along with the officials of MC, Ludhiana starting from 19.07.2023. On 21.07.2023, it was observed that two underground pipe of dia 8" and 12" were coming out from the premises of the CETP of 50 MLD. The PDA members claimed



that the 12" RCC line is provided to discharge rain water and effluent from the office toilets. The CETP is allowed only one dedicated outlet for its discharge, thus two outlets can be misused and also are not authorized. The PDA directors and members did not cooperate with the team and made arguments during the visit. Earlier, one another bypass was found into MC sewer, near MC workshop which was identified by the officers of the Board. Regular incidents of overflow are reported from time to time.

19) The SPV has also not submitted the adequacy certificate of the conveyance system from the PWSSB as already directed by the Board.

20) A complaint was received on 03.08.2023 regarding overflow and discharge of colored dyeing effluent at Iqbal Nagar, Tajpur Road, Ludhiana into Buddha Nallah.

21) To verify the facts the site was immediately visited by the officer of the Board in late evening hours on 03.08.2023 and found that overflow was from the PDA manhole of PDA conveyance line leading to CETP 50 MLD, Near Iqbal Nagar, Tajpur Road, Ludhiana, which was leading to Buddha Dariya. To stop the discharge as safety measures the dyeing units located upstream to this overflow were requested to close its operation. Accordingly, these units were closed to stop the overflow.

22) The same site was again visited on 04.08.2023 in early morning by the officers of the Board and overflow was again found from the said manhole, which was leading to the Buddha Dariya. The SPV of CETP 50 MLD (Tajpur Road Cluster) was again requested by the Board to control the same. Apart from above, stagnation of dyeing effluent was also found at Kakka road, Ludhiana. The overflow from the conveyance system of the CETP laid down by the PDA is occurring regularly and complaints are being received in the Board. After, checking overflow, CETP 50 MLD was also visited by the team and same was found in operation, during visit. As per the record supplied by the operating agency of the CETP, the average incoming of effluent at CETP from 01.07.2023 to 03.08.2023 is around 40 MLD. Further, the capacity of the each SBR tank of CETP is around 6.5 MLD, however, in the one SBR tank in which aeration was under process, the level was around 3 to 3.5 feet down from the top surface. Hence, the intake to CETP is also less, which is also one of the reasons of over flow in the area. The operating agency at site was advised to run the CETP at optimum capacity. Also, on 07.08.2023, again stagnation



/ overflow was observed in open plot near M/s Saral Dyers and M/s N.V Industry from the conveyance system of CETP 50 MLD. Further, inlet SCADA meters have yet not been installed in member units.

23) Accordingly, notice u/s 33-A of Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988 along with notice for imposition of Environmental Compensation was issued to the SPV with an opportunity of personal hearing before Chairman of the Board on 09.08.2023. During hearing, it was decided that:

“The Environmental Compensation (EC) be imposed on the SPV for the damage caused to the Environment for the period upto 31.07.2023.”

13) It is pertinent to mention here that the Hon'ble Supreme Court of India has considered the concept of Polluter Pays Principle in Indian Council for Enviro Legal Action and Others v/s Union of India and Others (1996) 3SCC 212, Vellore Citizens Welfare Forum v/s Union of India (1996) 5 SCC 647 and held that Polluter Pay's Principle is accepted principle and part of environmental law of the country even without specific statute.

10) Above facts are sufficient for the imposition of Environmental Compensation by invoking the Principle of Polluter Pays and the SPV thus made itself liable for Environmental Compensation under the Polluter Pay's Principle for the period of violation from 09.06.2022 to 28.07.2023.

11) Thus, in view of the above recorded facts, the matter was considered for imposition of Environmental Compensation for the period of violation from 09.06.2022 to 28.07.2023 in accordance with the formula and methodology evolved by the Central Pollution Control Board and adopted by the Punjab Pollution Control Board. The amount of Environmental Compensation for the period of violation from 09.06.2022 to 28.07.2023 (415 days) was calculated to be Rs. 1,24,50,000/- as per following details:

EC	=	PI x N x R x S x LF
PI	=	Violation under Water Act, 1974 by red category unit = 32
N	=	Number of days = 415 (09.06.2022 to 28.07.2023)
R	=	A factor in Rupees = 500 (Large Scale red category project)



S	=	Large Scale project = 1.5
LF	=	Municipal Corporation i.e. Ludhiana having population between one million to five million = 1.25
EC	=	$32 \times 415 \times 500 \times 1.5 \times 1.25 = \text{Rs. } 1,24,50,000/-$ (Rs. One Crore Twenty Four Lac Fifty thousand only)

12) Therefore, the industry is hereby directed to deposit an amount of Rs. 1,24,50,000/- (Rs. One Crore Twenty Four Lac Fifty thousand only) as Environmental compensation for the period of violation from 09.06.2022 to 28.07.2023 with the office of the Punjab Pollution Control Board within 15 days, from the date of receipt of this order, failing which, the Board shall be constrained to initiate necessary action for recovery of the amount of Environmental Compensation by adopting coercive measures, thereafter.

13) Take notice that no further intimation or reminder will be issued by the Board in this regard. Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana is directed to ensure compliance of directions issued in the case. A copy of this order be supplied to all the concerned for compliance.

Adarsh Pal Vig
 (Prof. (Dr.) Adarsh Pal Vig)
 Chairman



ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਕੰਟਰੋਲ ਬੋਰਡ
PUNJAB POLLUTION CONTROL BOARD

No.380.....

Dated.3/9/2024.....

Subject: Imposition of Environmental Compensation upon CETP of 50 MLD capacity installed at Tajpur Road, Ludhiana for violation of the provisions of Environmental Laws.

Order

That, the Punjab Pollution Control Board being the statutory regulatory authority is implementing the provisions of the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 and the rules made there under in the State of Punjab. The main objective of the Board is maintaining or restoring the wholesomeness of water, the preservation of the quality of air and the protection and improvement of the environment.

2) That, the Ministry of Environment, Forest & Climate Change (MoEF&CC), Government of India has declared various clusters in the Country as Critically Polluted Areas (CPA), Severely Polluted Area (SPA) based on Cumulative Environmental Pollution Index (CEPI) score. Due to increased industrialization, activities of the Industrial units and some other identical reasons, Ludhiana city has been declared as Critically Polluted Area by the Central Pollution Control Board.

3) Briefly stated that the Punjab Dyers Association (PDA) Ludhiana has setup a Common Effluent Treatment Plant (CETP) of capacity 50 MLD for treatment of waste water from the cluster of textiles dyeing industries located at Tajpur Road, Ludhiana. The Special Purpose Vehicle (SPV) was granted consent to operate under Water (Prevention & Control of Pollution) Act, 1974, vide no. CTOW/Fresh/LDH3/2022/18475759 dated 23.08.2022, valid upto 22.08.2023.

5) That, the SPV was afforded an opportunity of personal hearing before Chairman of the Board on 09.08.2023 due to various violations, wherein it was decided as under:

- The SPV shall ensure that there is no overflow from the manholes in the conveyance system of CETP 50 MLD at any locations.*
- The SPV shall submit adequacy certificate of the conveyance system provided at site from the Department of PWSSB as per directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 vide Board letter no. 4888-89 dated 18.07.2022, within one month.*
- Since, the conveyance system of the CETP is owned and maintained by the PDA, as such, PDA is required to take action as per law against such persons (making illegal connection into the conveyance system) at their own level.*

ਵਾਤਾਵਰਣ ਭਵਨ, ਨਾਭਾ ਰੋਡ, ਪਟਿਆਲਾ - 147001

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- d) *The SPV shall submit the feasibility report to reuse treated effluent onto land for irrigation, within one month.*
- e) *The SPV shall construct a proper outlet before discharge into Budha Nallah, from where effluent sample can be collected, within 10 days and also install one set of additional OCEMS at the said location, within one month.*
- f) *It was made clear to the PDA that the sole responsibility regarding achievement of standards at the outlet of CETP lies with the PDA and Board shall feel constrained to take action as per law against the PDA, in case, any violation is observed in future.*
- g) *The Environmental Compensation (EC) be imposed on the SPV for the damage caused to the Environment for the period upto 31.07.2023.*

6) That, the Grant-in-Aid was sanctioned to M/s Punjab Dyers Association for setting up of 50 MLD CETP at Tajpur Road, Ludhiana. While sanctioning the Grant-in-Aid, following special conditions were imposed on the SPV:

- a) *PDA will operate the CETP to comply with the parameters as purposed in the DPR and as the undertaking submitted to Punjab Pollution Control Board.*
- b) *PDA will install suitable tertiary treatment unit with the CETP to achieve effluent discharge standards of BOD 10 mg/l and COD 50 mg/l at their own cost within six months' time of commissioning and not later than December, 2020.*

7) That, the CETP 50 MLD was monitored in month of July, 2023, August, 2023 and September, 2023, October, 2023, November, 2023, December, 2023 & January, 2024. As per the analysis reports the CETP was found not achieving the standards as prescribed by the MoEF&CC as well as stringent standards as per DPR.

8) That, the SPV was violating the provisions of the Water (Prevention & Control of Pollution) Act, 1974 and not complying with the special conditions imposed during the sanction of Grant-in-Aid. Further, the SPV had not taken any steps for providing tertiary treatment components to control the TDS.

9) That, the SPV applied for renewal of 'Consent to Operate' under the Water (Prevention & Control of Pollution) Act, 1974 through OCMMS. However, the SPV did not submit any conclusive record w.r.t no. of shares issued by PDA / held by various members. Also, the PDA was required to get these shares DEMAT from ROC, within a time bound manner. Accordingly, the SPV industry was also given personal hearing before the Chairman of the Board on 30.10.2023 whereas it was decided as under:

1. *The Environmental Compensation (EC) be imposed on the SPV for the continued violations upto 30.09.2023.*
2. *The SPV shall comply with the following conditions as imposed by the MoEF&CC while releasing grant-in aid to the SPV:*
 - a. *PDA will operate the CETP to comply with the parameters proposed in the DPR and as the undertaking submitted to Punjab Pollution Control Board.*



- b. PDA will install suitable tertiary treatment unit with the CETP to achieve effluent discharge standards of BOD 10 mg/l and COD 50 mg/l at their own cost within six months' time of commissioning and not later than December, 2020.
3. The applications for obtaining consent to operate shall be decided after obtaining analysis results of the CETP for the samples collected by the Regional Office -3, Ludhiana in the month of October, 2023.
- 10) That, the show cause notice for refusal of consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 was also issued to the SPV for the above said reasons with an opportunity to submit written reply, within 07 days. However, the reply submitted by the SPV through e-mail to the said SCN was not found satisfactory.
- 11) That, the SPV did not submit any proposal regarding installation of tertiary treatment to achieve effluent discharge standards of BOD 10 mg/l and COD 50 mg/l.
- 12) That, the Municipal Corporation, Ludhiana vide its letter dated 16.01.2024 informed that there was a leakage in PDA line near Vijay Nagar Pulli (opposite G.P. Dyeing).
- 13) That, a videography dated 03.02.2024 of Hon'ble Member Parliament, Sh. Balbir Singh Seechewal Ji alongwith Sh. Daljit Singh Bhola Grewal, MLA Ludhiana East was received in the Board on 04.02.2024, in which team of Hon'ble Member Parliament, claimed that they had found a leakage in the Manhole of PDA line on 02.02.2023 and untreated effluent was being discharged into Buddha Dariya from this Manhole. It was also shown that the Manhole was freshly repaired by PDA. Location of this manhole was traced by officers of the Board on 04.02.2024 with representatives of Hon'ble Member Parliament in Bhamian Kalan, back side of City Bus yard.
- 14) That, another video clip was again received by the Board on 06.02.2024 from the team of Hon'ble MP Sant Baba Balbir Singh Seechewal Ji. In this video clip, a channel containing treated effluent of STP 225 MLD was found punctured from one side and coloured effluent was found coming from the 2 no. punctured holes which was ultimately going to Budhha Nallah after mixing with treated effluent of STP Jamalpur. Acting upon this video clip, officers of this office arrived at the site on 07.02.2024 in the early morning and started efforts to trace the source of effluent coming out in the channel as shown in the video clip. During further excavation, it was found that a pipeline of PDA containing untreated effluent of dyeing industries of Mahavir Complex (connecting 2 haudies of PDA lines i.e. upstream and downstream of site under complaint) was passing under the channel of STP Jamalpur just below the area where said two no. holes were observed in the outlet channel and colored effluent was also observed flowing around that pipeline. Thus, the possibility of leakage from the conveyance line of PDA passing under the channel of STP 225 MLD could not be ruled out.
- 15) That, accordingly, show cause notice for refusal of consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 and notice to issue directions under u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 was issued to the SPV with an



opportunity of personal hearing before Chairman of the Board on 12.02.2024, wherein it was decided as under:

1. *Consent applied by the SPV under the Water (Prevention & Control of Pollution) Act, 1974 be refused.*
2. *Directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 be issued for temporary closure of all the member units of the 50 MLD CETP, till all the leakages in its conveyance system are plugged properly and discharge of its un-treated effluent is stopped.*
3. *The PDA shall immediately take steps to stop the discharge of un-treated trade effluent.*
4. *The Environmental Compensation be imposed on the SPV for the damage caused to the environment.*
5. *Further action shall be taken after reviewing the progress made by the SPV.*

16) That, in compliance of the decision of the personal hearing, consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 was refused vide no. CTOW/Renewal/LDH3/2024/23440371 dated 23.02.2024. Also, the following directions u/s 33-A of Water (Prevention & Control of Pollution) Act, 1974 were issued to the all member units of PDA on 13.02.2024:

"That, the industry shall close down its operations temporarily, till all the leakages in its conveyance system of CETP are plugged properly and discharge of its un-treated effluent is stopped."

17) That, in compliance of above said decisions, PDA took shut down of all the member units of CETP 50 MLD on 13.02.2024 and 14.02.2024 and leakage was repaired. The repair was verified by the officers of the Board and no further leakage was observed from that point thereafter. The main cause of the frequent leakages from manholes was that all the manholes were constructed with brick masonry material and flow rate as well as pressure in the manholes was very high and thus the manholes should had been concrete casted instead of brick masonry material.

18) That, frequent complaints had been received by the Board regarding overflow in the PDA conveyance system manholes laid in the area of Mahaveer Complex, Geeta Colony, Jaswal Complex etc of Tajpur Road.

19) That, the area of Tajpur Road was visited by the officers of the Board alongwith Hon'ble Member Parliament Baba Balbir Singh Seechewal Ji and officials of Municipal Corporation, Ludhiana. During visit 02 complainants arrived at the site of visit and informed that PDA used to dispose of colored effluent in vacant plots which cause stagnation in plots of Jaswal complex Ludhiana. They also added that their own industry (green category) is also situated at Jaswal complex and colored water also comes from the submersibles of their factory. Thereafter, area of Jaswal complex was visited and waste water was found stagnated in 03 plots



of Jaswal complex and from one plot stagnated waste water was being pumped into the manhole of PDA line with the help of pump. The PDA informed that the stagnated waste water was rain water and they were shifting the stagnated water from plots to their own sewer network to clear stagnation. During visit, a beaker of waste water was also filled from stagnation and water was appearing turbid in colour and seemed like domestic wastewater/ rain water.

20) That, the wastewater sampling of CETP 50 MLD was carried out in the month of February, 2024 & March, 2024 and as per analysis results the CETP was found not achieving the standard prescribed as per DPR.

21) That, as per physical observation during visit on 06.03.2024 in the area, possibility of overflow from the PDA manhole could not be ruled out as frequent complaints were being received by the Board regarding overflow in the area of Tajpur Road, complex from PDA manholes.

22) That, the area of Tajpur Road, Ludhiana was visited by officer of the Board on 29.03.2024 to verify the video clip regarding overflow in manholes of PDA line near Fish Market, Tajpur Road, Ludhiana. During visit, it was observed that the overflow in the manholes was due to choking of the lines connected with the manholes. The overflow was controlled by the PDA immediately by removing the blockage from the manhole and connecting lines.

23) That, the CETP was visited by the officers of the Board on 05.04.2024 during odd hours at about 9:30 pm to verify status of video clip regarding disposal of colored effluent from the outlet of CETP 50 MLD into Buddha Nallah and during visit effluent samples were collected from inlet and outlet of CETP and physical appearance of sample collected from outlet was slightly yellowish.

24) That, thereafter outlet of CETP situated at Budha Nallah was again visited on same day at 11:50 pm and it was observed that dark colored effluent was being discharged from outlet of CETP into Buddha Nallah. It was apprehended that the CETP had provided a by-pass arrangement to discharge untreated effluent into Buddha Nallah through outlet pipe as the color of effluent at outlet was similar to color at inlet of CETP. Effluent samples were also collected from outlet to CETP at 11:50 PM.

25) That, in continuation to observations of 05.04.2024 regarding possibility of by-pass system, CETP 50 MLD was again visited on 06.04.2024 and conveyance lines of CETP were checked and it was observed that CETP 50 MLD had provided a manhole and a large size Gate Valve in a closed room (with locked door and no window) located in a gated premises near PSPCL 66 KV Sub Station. This premise is not the part of CETP premises but it is under the control of PDA. Through this manhole untreated effluent could be directly diverted into 50 MLD CETP outlet line which ultimately falls into Buddha Nallah without any treatment.

26) That, further, on evening of 14.05.2024, a telephonic message was received from the MCL officials that untreated effluent of dyeing industries was being discharged into sewer line of MCL at street no. 1, Vijay Nagar, Geeta Nagar Colony. The area was inspected by officers



of the Board alongwith officials of MCL and it was observed that the color of effluent in MCL manhole was pink and the effluent flowing in PDA line at Geeta Nagar was also pink in color. Accordingly, the area around the MCL manhole in street no-1, Vijay nagar was excavated by MCL and an underground 12 inch SW Pipeline was found in Street no -1. With the help of bamboo sticks it was observed that the 12 inch SW pipe was coming from PDA haudi on main Geeta Nagar toward MCL haudi in Street no-1, Vijay Nagar. Excavation at street no-1, Vijay Nagar was done till late night on 14.05.2024. The excavation in street no. -1 was again started in the morning of 15.05.2024. Pipeline of jetting machine was inserted in 12 inch SW pipeline from MCL manhole side and this pipeline reached PDA manhole on main Geeta Nagar Colony. Thus, PDA has made a clear bye-pass arrangement from its manhole on main Geeta Nagar Road (Near G.P. Dyeing) to MCL haudi in Street no-1, Vijay Nagar, Geeta Colony, Ludhiana (Back side of M/s Gupta Shivam Dyeing, Geeta Nagar). The MCL has disconnected this 12 inch SW pipe from its haudi in street no -1, Vijay Nagar, Geeta Colony, Ludhiana.

27) That, it shows that the PDA had intentionally provided bypass to discharge untreated effluent into Buddha Nallah.

28) That, the SPV was deliberately violating the provisions of the Water (Prevention & Control of Pollution) Act, 1974 and degrading the environment.

29) That, notice to issue directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 was issued to the SPV with an opportunity of personal hearing before Chairman of the Board on 20.05.2024. However, no one from the SPV attended the hearing. The SPV has sent an e-mail dated 17.05.2024, requesting for another date of hearing.

30) That, the matter was considered by the Competent Authority of the Board and it was decided to afford another opportunity of personal hearing to the SPV.

31) That, notice to issue directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 was issued to the SPV with an opportunity of personal hearing before Chairman of the Board on 14.06.2024.

32) That, Sh. Bobby Jindal, Proprietor of the SPV attended the hearing and submitted a written reply which was taken on record. He stated that they had not submitted any conclusive record regarding allotment of shares to members of CETP. Allotment of shares to member units had been finalized to complete satisfaction of Board. He stated that all the man holes prone to leakage had been constructed in concrete mix instead of brick masonry. The blockage in the sewer line was promptly rectified by the PDA upon coming the defect into its notice. Regarding discharge of dark colour effluent at about 11:30 pm on 05.04.2024, he added that in absence of full test report of said effluent it was not possible to offer any comment / explanation for quality of the effluent from CETP at that time. He informed that neither they were bye passing any waste water nor they had any active bye pass arrangement. Finding a defunct manhole and sluice valve did not having basis to apprehend existence of any bye pass arrangement for direct discharge of waste water into Buddha Nallah. Sewer network for collection of wastewater from



member units was laid prior to construction and commissioning of CETP which was held up till 2019 for want of sanction of project of CETP by MoEF&CC. The said sewer line was connected to CETP inlet when the CETP was constructed and the said manhole and manual valve in it remained disconnected and inoperable. It was neither connected to CETP inlet line nor the CETP outlet carrier line to Buddha Nallah. As matter of abundant precaution, said manhole had now been completely dismantled. The connection of sewer network with municipal sewer to STP had been removed simultaneously with connection of said network to CETP inlet upon its commissioning. Thus, there had never been nor there was any possibility of bye pass of waste water to Buddha Nallah from industries through sewer network.

33) After hearing, the Director of the SPV, officers of the Board and considering the material facts of the case, the Chairman of the Board decided as under:

1. The PDA shall ensure that all the member units of CETP 50 MLD shall make connectivity of their effluent directly into dedicated sewer line of PDA and shall not discharge their effluent into the PDA sewer line through any other secondary sewer line laid in the area. Environmental Engineer, Regional Office-3, Ludhiana shall verify the same and report compliance.
2. The PDA shall submit bank guarantee of Rs. 50 Lakh as an assurance that in future, there will be no overflow from the PDA sewer line / manholes in the area to avoid stagnation of effluent on roads/ in vacant plots of the area.
3. The Environmental Compensation of Rs. 25 Lakh be imposed on the SPV for the damage caused to the Environment.
4. The PDA shall submit adequacy certificate of the conveyance system provided at site form the Department of PWSSB as per directions u/s 33-A of the Water (Prevention & Control of Pollution Act) Act, 1974 vide Board letter no. 4888-89 dated 18.07.2022, within one month.
5. It was made clear to PDA that responsibility to stop unauthorized discharges into PDA sewer lines lies with PDA and PDA have to take corrective actions in this regard.
6. The Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana shall process the 'Consent to Operate' application under the Water (Prevention & Control of Pollution Act) Act, 1974 on merits.

34) It is pertinent to mention here that the Hon'ble Supreme Court of India has considered the concept of Polluter Pays Principle in Indian Council for Enviro Legal Action and Others v/s Union of India and Others (1996) 3SCC 212, Vellore Citizens Welfare Forum v/s Union of India (1996) 5 SCC 647 and held that Polluter Pay's Principle is accepted principle and part of environmental law of the country even without specific statute.

35) Above facts are sufficient for the imposition of Environmental Compensation by invoking the Principle of Polluter Pays and the SPV thus made itself liable for Environmental Compensation under the Polluter Pay's Principle.



36) Thus, in view of the above recorded facts, the matter was considered for imposition of Environmental Compensation of Rs. 25 Lacs as decided in the personal hearing afforded to the SPV.

37) Therefore, the SPV is hereby directed to deposit an amount of Rs. 25,00,000/- (Rs. Twenty Five Lac only) as Environmental compensation with the office of the Punjab Pollution Control Board within 15 days, from the date of receipt of this order, failing which, the Board shall be constrained to initiate necessary action for recovery of the amount of Environmental Compensation by adopting coercive measures, thereafter.

38) Take notice that no further intimation or reminder will be issued by the Board in this regard. Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana is directed to ensure compliance of directions issued in the case. A copy of this order be supplied to all the concerned for compliance.

Adarsh Pal Vig
(Prof. (Dr.) Adarsh Pal Vig)
Chairman



ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਰੋਕਥਾਮ ਬੋਰਡ
PUNJAB POLLUTION CONTROL BOARD



Zonal Office-II, E-648-B, Back Side CICU Office, Phase-5, Focal Point, Ludhiana
E-mail: seezo2ldhppcb@yahoo.com

Ph No. 0161-2670141

No. PPCB/SEE/ZO-2/LDH/2024/.....

Registered

ਸਾਨਅਰ ਸਹਾਇਕ ਕਲਰਕ/ਡੀ.ਓ.ਓ/ਸਹਾ ਵਾਤਾ ਇੰਜੀ

To

The Chairman,
Punjab Dyers Association 50 MLD CETP Plant,
Backside Central Jail, Tajpur Road, Ludhiana.

ਨਵੀਂ ਡਾਕ ਨੂੰ ਵਾਤਾ ਇੰਜੀ

ਵਾਤਾ ਇੰਜੀ

ਡਾਇਰੀ ਨੰ ੨੨੨.੨੨ ਮਿਤੀ ੨੨/੧੨/੨੪

Subject: Imposition of Environmental Compensation upon CETP of 50 MLD capacity installed at Tajpur Road, Ludhiana for violation of the provisions of Environmental Laws- order thereof.

Please find enclosed order no. 465 dated 27.11.2024 passed by the Competent Authority of the Punjab Pollution Control Board, whereby, the Environmental Compensation amounting to Rs. 58,80,000 /- (Rs. Fifty-Eight Lacs Eighty Thousand Only) has been imposed upon the Special Purpose Vehicle (SPV) i.e. Punjab Dyers Association (50 MLD CETP) for violation of the provisions of Environmental Laws for period from 01.08.2023 to 12.02.2024 for information and compliance. It is requested to deposit the Environmental Compensation, within 15 days, from the date of receipt of this order.

DA/as above

sd/-

Environmental Engineer

Endst. No. 6622

Dated 29/11/24

A copy of the above alongwith order no. 465 dated 27.11.2024 is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana for information and necessary action. He is requested to get the copy of the above said order received by the project proponent.

DA/as above

Environmental Engineer



ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਕੰਟਰੋਲ ਬੋਰਡ

PUNJAB POLLUTION CONTROL BOARD

D. 465

Dated. 27/11/24

Subject: Imposition of Environmental Compensation upon CETP of 50 MLD capacity installed at Tajpur Road, Ludhiana for violation of the provisions of Environmental Laws.

Order

That, the Punjab Pollution Control Board being the statutory regulatory authority is implementing the provisions of the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 and the rules made three under in the State of Punjab. The main objective of the Board is maintaining or restoring the wholesomeness of water, the preservation of the quality of air and the protection and improvement of the environment.

2) That, the Ministry of Environment, Forest & Climate Change (MoEF&CC), Government of India has declared various clusters in the Country as Critically Polluted Areas (CPA), Severely Polluted Area (SPA) based on Cumulative Environmental Pollution Index (CEPI) score. Due to increased industrialization, activities of the Industrial units and some other identical reasons, Ludhiana city has been declared as Critically Polluted Area by the Central Pollution Control Board.

3) Briefly stated that the Punjab Dyers Association (PDA) Ludhiana has setup a Common Effluent Treatment Plant (CETP) of capacity 50 MLD for treatment of waste water from the cluster of textiles dyeing industries located at Tajpur Road, Ludhiana. The Special Purpose Vehicle (SPV) was granted consent to operate under Water (Prevention & Control of Pollution) Act, 1974, vide no. CTOW/Fresh/LDH3/2022/18475759 dated 23.08.2022, valid upto 22.08.2023.

5) That, the SPV was afforded an opportunity of personal hearing before Chairman of the Board on 09.08.2023 due to various violations, wherein it was decided as under:

- The SPV shall ensure that there is no overflow from the manholes in the conveyance system of CETP 50 MLD at any locations.*
- The SPV shall submit adequacy certificate of the conveyance system provided at site from the Department of PWSSB as per directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 vide Board letter no. 4888-89 dated 18.07.2022, within one month.*

ਵਾਤਾਵਰਣ ਭਵਨ, ਨਾਭਾ ਰੋਡ, ਪਟਿਆਲਾ - 147001

Vatavaran Bhawan, Nabha Road, Patiala - 147001

Phone : Chairman. : 0175-2215793, Member Secretary : 0175-2215802 (O), 2215636 (FAX)

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- c) Since, the conveyance system of the CETP is owned and maintained by the PDA, as such, PDA is required to take action as per law against such persons (making illegal connection into the conveyance system) at their own level.
- d) The SPV shall submit the feasibility report to reuse treated effluent onto land for irrigation, within one month.
- e) The SPV shall construct a proper outlet before discharge into Budha Nallah, from where effluent sample can be collected, within 10 days and also install one set of additional OCEMS at the said location, within one month.
- f) It was made clear to the PDA that the sole responsibility regarding achievement of standards at the outlet of CETP lies with the PDA and Board shall feel constrained to take action as per law against the PDA, in case, any violation is observed in future.
- g) The Environmental Compensation (EC) be imposed on the SPV for the damage caused to the Environment for the period upto 31.07.2023.

6) That, the Grant-in-Aid was sanctioned to M/s Punjab Dyers Association for setting up of 50 MLD CETP at Tajpur Road, Ludhiana. While sanctioning the Grant-in-Aid, following special conditions were imposed on the SPV:

- a) PDA will operate the CETP to comply with the parameters as purposed in the DPR and as the undertaking submitted to Punjab Pollution Control Board.
- b) PDA will install suitable tertiary treatment unit with the CETP to achieve effluent discharge standards of BOD 10 mg/l and COD 50 mg/l at their own cost within six months' time of commissioning and not later than December, 2020.

7) That, the CETP 50 MLD was monitored in month of July, 2023, August, 2023 and September, 2023, October, 2023, November, 2023, December, 2023 & January, 2024. As per the analysis reports the CETP was found not achieving the standards as prescribed by the MoEF&CC as well as stringent standards as per DPR.

8) That, the SPV was violating the provisions of the Water (Prevention & Control of Pollution) Act, 1974 and not complying with the special conditions imposed during the sanction of Grant-in-Aid. Further, the SPV had not taken any steps for providing tertiary treatment components to control the TDS.

9) That, the SPV applied for renewal of 'Consent to Operate' under the Water (Prevention & Control of Pollution) Act, 1974 through OCMMS. However, the SPV did not submit any conclusive record w.r.t no. of shares issued by PDA / held by various members. Also, the PDA was required to get these shares DEMAT from ROC, within a time bound manner. Accordingly, the SPV industry was also given personal hearing before the Chairman of the Board on 30.10.2023 whereas it was decided as under:

1. The Environmental Compensation (EC) be imposed on the SPV for the continued violations upto 30.09.2023.



2. *The SPV shall comply with the following conditions as imposed by the MoEF&CC while releasing grant-in aid to the SPV:*
 - a. *PDA will operate the CETP to comply with the parameters proposed in the DPR and as the undertaking submitted to Punjab Pollution Control Board.*
 - b. *PDA will install suitable tertiary treatment unit with the CETP to achieve effluent discharge standards of BOD 10 mg/l and COD 50 mg/l at their own cost within six months' time of commissioning and not later than December, 2020.*
 3. *The applications for obtaining consent to operate shall be decided after obtaining analysis results of the CETP for the samples collected by the Regional Office -3, Ludhiana in the month of October, 2023.*
- 10) That, the show cause notice for refusal of consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 was also issued to the SPV for the above said reasons with an opportunity to submit written reply, within 07 days. However, the reply submitted by the SPV through e-mail to the said SCN was not found satisfactory.
- 11) That, the SPV did not submit any proposal regarding installation of tertiary treatment to achieve effluent discharge standards of BOD 10 mg/l and COD 50 mg/l.
- 12) That, the Municipal Corporation, Ludhiana vide its letter dated 16.01.2024 informed that there was a leakage in PDA line near Vijay Nagar Pulli (opposite G.P. Dyeing).
- 13) That, a videography dated 03.02.2024 of Hon'ble Member Parliament, Sh. Balbir Singh Seechewal Ji alongwith Sh. Daljit Singh Bhola Grewal, MLA Ludhiana East was received in the Board on 04.02.2024, in which team of Hon'ble Member Parliament, claimed that they had found a leakage in the Manhole of PDA line on 02.02.2023 and untreated effluent was being discharged into Buddha Dariya from this Manhole. It was also shown that the Manhole was freshly repaired by PDA. Location of this manhole was traced by officers of the Board on 04.02.2024 with representatives of Hon'ble Member Parliament in Bhamian Kalan, back side of City Bus yard.
- 14) That, another video clip was again received by the Board on 06.02.2024 from the team of Hon'ble MP Sant Baba Balbir Singh Seechewal Ji. In this video clip, a channel containing treated effluent of STP 225 MLD was found punctured from one side and coloured effluent was found coming from the 2 no. punctured holes which was ultimately going to Budhha Nallah after mixing with treated effluent of STP Jamalpur. Acting upon this video clip, officers of this office arrived at the site on 07.02.2024 in the early morning and started efforts to trace the source of effluent coming out in the channel as shown in the video clip. During further excavation, it was found that a pipeline of PDA containing untreated effluent of dyeing industries of Mahavir Complex (connecting 2 haudies of PDA lines i.e. upstream and downstream of site under



complaint) was passing under the channel of STP Jamalpur just below the area where said two no. holes were observed in the outlet channel and colored effluent was also observed flowing around that pipeline. Thus, the possibility of leakage from the conveyance line of PDA passing under the channel of STP 225 MLD could not be ruled out.

15) That, accordingly, show cause notice for refusal of consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 and notice to issue directions under u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 was issued to the SPV with an opportunity of personal hearing before Chairman of the Board on 12.02.2024, wherein it was decided as under:

1. *Consent applied by the SPV under the Water (Prevention & Control of Pollution) Act, 1974 be refused.*
2. *Directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 be issued for temporary closure of all the member units of the 50 MLD CETP, till all the leakages in its conveyance system are plugged properly and discharge of its un-treated effluent is stopped.*
3. *The PDA shall immediately take steps to stop the discharge of un-treated trade effluent.*
4. *The Environmental Compensation be imposed on the SPV for the damage caused to the environment.*
5. *Further action shall be taken after reviewing the progress made by the SPV.*

16) it is pertinent to mention here that the Hon'ble Supreme Court of India has considered the concept of Polluter Pays Principle in Indian Council for Enviro Legal Action and Others v/s Union of India and Others (1996) 3SCC 212, Vellore Citizens Welfare Forum v/s Union of India (1996) 5 SCC 647 and held that Polluter Pay's Principle is accepted principle and part of environmental law of the country even without specific statute.

17) Above facts are sufficient for the imposition of Environmental Compensation by invoking the Principle of Polluter Pays and the SPV thus made itself liable for Environmental Compensation under the Polluter Pay's Principle.

18) Thus, in view of the above recorded facts, the matter was considered for imposition of Environmental Compensation for the period of violation from 01.08.2023 to 12.02.2024 in accordance with the formula and methodology evolved by the Central Pollution Control Board and adopted by the Punjab Pollution Control Board. The amount of Environmental Compensation for the period of violation from 01.08.2023 to 12.02.2024 (196 days) was calculated to be Rs. 58,80,000/- (18,30,000 + 40,50,000) as per following details:

(i) **01.08.2023 to 30.09.2023**



EC	=	PI x N x R x S x LF
PI	=	Violation under Water Act, 1974 by red category unit = 32
N	=	Number of days = 61 (01.08.2023 to 30.09.2023)
R	=	A factor in Rupees = 500 (Large Scale red category project)
S	=	Large Scale project = 1.5
LF	=	Since the project is located in city with population less than 5 million = 1.25
EC	=	32 x 61 x 500 x 1.5 x 1.25 = Rs. 18,30,000/- (Rs. Eighteen Lacs Thirty Thousand only)

(ii) 01.10.2023 to 12.02.2024.

EC	=	PI x N x R x S x LF
PI	=	Violation under Water Act, 1974 by red category unit = 32
N	=	Number of days = 135 (01.08.2023 to 30.09.2023)
R	=	A factor in Rupees = 500 (Large Scale red category project)
S	=	Large Scale project = 1.5
LF	=	Since the project is located in city with population less than 5 million = 1.25
EC	=	32 x 135 x 500 x 1.5 x 1.25 = Rs. 40,50,000/- (Rs. Fourty Lacs Fifty Thousand only)

19) Therefore, the SPV is hereby directed to deposit an amount of Rs. 58,80,000/- (18,30,000 + 40,50,000) (Fifty Eight Lacs Eighty Thousand Only) as Environmental compensation with the office of the Punjab Pollution Control Board within 15 days, from the date of receipt of this order, failing which, the Board shall be constrained to initiate necessary action for recovery of the amount of Environmental Compensation by adopting coercive measures, thereafter.

20) Take notice that no further intimation or reminder will be issued by the Board in this regard. Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana is directed to ensure compliance of directions issued in the case. A copy of this order be supplied to all the concerned for compliance.

ਮਿਤਰ ਮਾ ਪੇਸ਼
(Prof. (Dr.) Adarsh Pal Vig)
Chairman



ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਰੋਕਥਾਮ ਬੋਰਡ
PUNJAB POLLUTION CONTROL BOARD



Zonal Office-II, E-648-B, Back Side CICU Office, Phase-5, Focal Point, Ludhiana
E-mail: seezo2ldhppcb@yahoo.com

Ph No. 0161-2670141

No. PPCB/SEE/ZO-2/LDH/2024/..... Registered
To

The Chairman,
Punjab Dyers Association 50 MLD CETP Plant,
Backside Central Jail, Tajpur Road, Ludhiana.

Dated

ਨਵੀਂ ਡਾਕ ਜੂ. ਵਾਤਾ ਇੰਜੀ

ਵਾਤਾ ਇੰਜੀ

ਡਾਇਰੀ ਨੰ. 54... ਮਿਤੀ 8/1/25

Subject: **Imposition of Environmental Compensation upon CETP of 50 MLD capacity installed at Tajpur Road, Ludhiana for violation of the provisions of Environmental Laws- order thereof.**

Please find enclosed order no. 513 dated 31.12.2024 passed by the Competent Authority of the Punjab Pollution Control Board, whereby, the Environmental Compensation amounting to Rs. 41,60,000 /- (Rs. Forty One Lacs sixty Thousand only) has been imposed upon the Special Purpose Vehicle (SPV) i.e. Punjab Dyers Association (50 MLD CETP). It is requested to deposit the Environmental Compensation, within 15 days, from the date of receipt of this order.

DA/as above

Sell
Environmental Engineer

Endst. No. 49:.....

Dated...03/01/25

A copy of the above alongwith order no. 513 dated 31.12.2024 is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana for information and necessary action. He is requested to get the copy of the above said order received by the project proponent.

DA/as above

Kishor
Environmental Engineer



No. 513

Dated. 31.12.2024

Subject: Imposition of Environmental Compensation upon CETP of 50 MLD capacity installed at Tajpur Road, Ludhiana for violation of the provisions of Environmental Laws.

Order

Whereas, the Punjab Pollution Control Board being the statutory regulatory authority is implementing the provisions of the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 and the rules made three under in the State of Punjab. The main objective of the Board is maintaining or restoring the wholesomeness of water, the preservation of the quality of air and the protection and improvement of the environment.

2) And whereas, the Ministry of Environment, Forest & Climate Change (MoEF&CC), Government of India has declared various clusters in the Country as Critically Polluted Areas (CPA), Severely Polluted Area (SPA) based on Cumulative Environmental Pollution Index (CEPI) score. Due to increased industrialization, activities of the Industrial units and some other identical reasons, Ludhiana city has been declared as Critically Polluted Area by the Central Pollution Control Board.

3) And whereas, the Punjab Dyers Association (PDA) Ludhiana has setup a Common Effluent Treatment Plant (CETP) of capacity 50 MLD for treatment of waste water from the cluster of textiles dyeing industries located at Tajpur Road, Ludhiana.

4) And whereas, the SPV was granted Environmental Clearance by the Ministry of Environment, Forest and Climate Change vide letter no. F.No.10-92/2010-IA.III dated 03.05.2013 for establishment of Common Effluent Treatment Plant of capacity 117 MLD for treatment of trade effluent of cluster of dyeing units of Ludhiana subject to the specific condition that "there will be no discharge in the Buddha Nallah.

5) And whereas, the matter regarding the release of grant-in-aid to the SPV considered by the MoEF&CC, Govt. of India in its appraisal committee on 11.10.2019 in which the grant-in-aid was approved to the SPV by the MoEF&CC, Govt. of India, subject to following conditions:

- i. PDA will operate the CETP to comply with the parameters as proposed in the DPR and as per the undertaking submitted to the Punjab Pollution Control Board.



- ii. PDA will install suitable tertiary treatment unit with the CETP to achieve effluent discharge standards of BOD 10 mg/l and COD 50 mg/l at their own cost within six months' time of commissioning and not later than December, 2020.
- iii. The CETP will not discharge its effluent into Budhha Nallah and it will reuse either into the back process or irrigation by laying their own network at their own cost.
- 6) And whereas, the SPV was granted Consent to Operate (CTO) by the Board under the Water (Prevention and Control of Pollution) Act, 1974 vide no. CTOW/ Fresh/ LDH3/ 2022/ 18475759 dated 23/08/2022 which got expired on 22/08/2023. The said consent was granted temporarily for discharge of trade effluent into the Budha Nallah with following special conditions relevant with the subject cited matter:
- The SPV shall submit the feasibility report to reuse treated effluent onto land for irrigation by 25.08.2022.
 - The SPV shall ensure that there is no overflow from the manholes in the conveyance system of CETP of 50 MLD capacity at any location.
- The SPV shall stabilise the CETP so as to achieve the prescribed standards at the final outlet by 30.09.2022 failing which the Board shall be constrained to refuse the consent to operate the outlet & issue closure directions to the member industries & impose Environmental Compensation without any further notice.
- 7) And whereas, the SPV is violating the provisions of Water (Prevention and Control of Pollution) Act, 1974 since its inception on 09.06.2022, by way of discharging its wastewater into Budha Nallah, by causing stagnation on the roads due to overflow in the conveyance system of CETP and by not achieving the standards as per the DPR submitted by it while obtaining grant-in-aid as well as the standards for textile industries and CETPs as notified by the MoEF&CC, Govt. of India on 01.01.2016.
- 8) And whereas, the SPV has been continuously persuaded by the Board for submitting the feasibility report for discharge of treated effluent onto land for irrigation as well as ensuring there is no overflow in the conveyance system of the CETP and achieving the prescribed standards. Accordingly, the SPV has been afforded personal hearing before the Chairman of the Board many times, i.e. on 07.07.2022, 25.07.2022, 29.09.2022, 09.08.2023, 31.10.2023, 12.02.2024 and on 14.06.2024, but the SPV has failed to submit any proposal for utilising the treated effluent onto land for irrigation and also has failed to achieve the standards as per the DPR submitted by it to the MoEF&CC and the standards as prescribed by the MoEF&CC vide notification dated 01.01.2016.
- 9) And whereas, on account of various violations of the provisions of Water (Prevention and Control of Pollution) Act, 1974, the Environmental Compensation has been imposed on the SPV by the Board from time to time.



- 10) And whereas, the SPV was imposed Environmental Compensation of Rs. 1,24,50,000/- vide order no. 383 dated 04.09.2024 for the period of 09.06.2022 to 28.07.2023, the Environmental Compensation of Rs. 25,00,000/- vide order no. 380 dated 03.09.2024 (as per the decision of the personal hearing dated 14.06.2024) and the Environmental Compensation of Rs. 58,80,000/- (Rs. 18,30,000/- for period of 01.08.2023 to 30.09.2023 and Rs. 40,50,000/- for period of 01.10.2023 to 12.02.2024) vide order no. 465 dated 27.11.2024, totalling of Rs. 2,08,30,000/-.
- 11) And whereas, the SPV has failed to deposit the Environmental Compensation, till date.
- 12) And whereas, in compliance of directions of the Central Monitoring Committee (CMC), CPCB carried out inspection and monitoring of CETP of 50 MLD capacity on 22.04.2024 and following observations were made:
1. During the visit on 22.04.2024, the CETP was found operational with the flow rate of 46 MLD. The CETP receives effluent through dedicated underground pipeline and the treatment is based on Sequential Batch Reactor (SBR) technology. It was informed to the team that as per the consent, the CETP is permitted to discharge the treated effluent into Buddha Nallah (which meets River Sutlej) through underground pipeline from CETP. However, as per the EC issued by MoEF&CC to the CETP dated 03.05.2013, "the treated wastewater will be used for irrigation" and it is also mentioned in the special terms & conditions that, "There shall be no discharge into Buddha Nallah".
 2. The consent under the Air Act, 1981 is valid upto 31.03.2026 for the operation of 50 MLD CETP. However, the Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 was valid till 04.12.2023 and the consent under the Water Act, 1974 was valid till 22.08.2023. The CETP has not got its consent under the Water (Prevention & Control of Pollution) Act, 1974 and authorization under the Hazardous & Other Wastes (Management and Trans-boundary Movement) Rules, 2016 renewed, till date.
 3. It was reported that 110 Dyeing and Printing units have obtained membership from common effluent treatment plant, it was also informed by the CETP operator that inlet norms for CETP is not prescribed in the consent.
 4. Grab samples were collected from the CETP during monitoring. The analysis result of samples collected from CETP outlet reveals that BOD: 128 mg/l (Standard: 30 mg/l), COD: 382 mg/l (Standard: 250 mg/l) and Chloride: 1713 mg/l (Standard: 1000 mg/l) exceeds the notified effluent discharge standards for CETP. Remaining monitored parameters are within the prescribed standards.



5. Grab sample were also collected from the Sequential Batch Reactor (SBR) tank for MLSS & MLVSS. The analysis result reveals that the concentration of MLSS: 300 mg/l (Designed value: 5000 mg/l) and concentration of MLVSS: 215 mg/l (Designed value: 4000 mg/l) are less than the designed values, which indicates the poor operation of the SBR.
6. The CETP has installed Online Continuous Effluent Monitoring System (OCEMS) at the final outlet of treated wastewater for the parameters pH, TSS, COD, BOD, with connectivity to PPCB & CPCB servers. During the visit, the OCEMS was found operational and variation in OCEMS reading compared with the monitored results - was also reported which indicates the improper working / validation / calibration of OCEMS system.
7. During the visit, it was observed that the CETP has provided sludge storage facility and obtained membership from M/s Re-sustainability Limited (M/s Ramky Enviro Engineers Limited) for disposal of sludge. The CETP had disposed 1597.20 MT sludge during the year 2023-24 through TSDF and further, as per log book records, about 173 MT was stored in the premises.
- 13) The SPV was violating the provisions of the Water (Prevention & Control of Pollution) Act, 1974.
- 14) In light of deficiencies as observed by CPCB team of officers in operation of the CETPs of Ludhiana installed for dyeing units during its visit on 22.04.2024, the Central Pollution Control Board issued directions u/s 18/1(b) of the Water (Prevention & Control of Pollution) Act, 1974 to the Punjab Pollution Control Board vide letter no. CPCB/IPC-VII/CETP-Ludhiana/3471 dated 12.08.2024 to take appropriate action in the matter including imposition of Environmental Compensation and to ensure that the CETP is operated ensuring:
 - a) Operation/ augmentation of the treatment system, appropriately, so as to meet the prescribed discharge standards and to comply with the disposal condition mentioned in the Environmental Clearance by MoEF&CC dated 03.05.2013 and 08.12.2014 in the aforesaid 40 MLD, 50 MLD & 15 MLD CETPs. Further, to stop discharging of treated effluent into Buddha Nallah from 50 MLD, 40 MLD & 15 MLD CETPs.
 - b) With valid consent under the Water Act, 1974/ Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 from PPCB and comply with all the conditions mentioned thereof.
 - c) Undertaking regular calibration, maintenance and validation of the OCEMS analysers as per standard operating procedures/recommendations of the suppliers, so as to ensure generation of continuous & reliable data.

Vide the said directions dated 12.08.2024, the Punjab Pollution Control Board was further directed by Central Pollution Control Board as under:



- a. To prescribe disposal condition to respective CETPs in accordance with the Environmental Clearance by MoEF&CC dated 03.05.2013 & 08.12.2014.
- b. To prescribe inlet standards for CETP in accordance to the CETP notification dated 01.01.2016.
- c. To regularly undertake verification of member industries of the CETP for ensuring proper operation of PETP/ETP by individual member industry.

15) And whereas, considering the directions issued by the Central Pollution Control Board u/s 18(1) (b) of the Water (Prevention and Control of Pollution) Act, 1974 to the Punjab Pollution Control Board vide letter dated 12.08.2024, notice to issue directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988 was issued to the SPV with an opportunity of personal hearing before Chairman of the Board on 13.09.2024 (postponed to 18.09.2024). Sh. Vivek Jindal & Sh. G.P. Singh, Directors of SPV (CETP 50 MLD) and Sh. I.K. Kapila, Advocate, Hon'ble Supreme Court of India attended the hearing and submitted a written reply which was taken on record. At first instance, the representatives had shown disagreement with the technical report of the CPCB in light of assumed technical errors and requested for resampling of the CETP. The representatives further informed that the OCMS system had been got calibrated. Regarding utilization of treated wastewater for irrigation purposes, no proposal was submitted by the representatives of the SPV. It was further informed that the SPV has applied for obtaining consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 to the Board. During hearing, it was observed by the Competent Authority that the SPV was earlier granted Environmental Clearance by the MoEF&CC on 03.05.2013 with a specific condition that there shall be no discharge into the Buddha Nallah. The SPV is constantly being pursued by the Board to submit proposal / feasibility report to re-use the effluent onto land for irrigation as a condition of consent to operate granted temporarily under the Water (Prevention & Control of Pollution) Act, 1974 as well as in various hearings afforded to the SPV by the Competent Authority / Chairman of the Board. But, the SPV has failed to submit any proposal in this regard and thus the SPV is violating the provisions of Environmental Clearance obtained from the Ministry of Environment, Forest and Climate Change, Government of India. Even after the imposition Environmental Compensation and Bank Guarantee for compliance of environmental norms, the SPV is still violating the provisions of the Water (Prevention & Control of Pollution) Act, 1974 as concluded by the CPCB in its report. The representatives of the SPV could not give any satisfactory reply to the observations raised by the competent authority during the course of hearing. After detailed deliberations and hearing the representatives of SPV, officers of the Board and taking into consideration various factors including the seriousness of the issue, the Chairman of the Board observed that the objective to restrain the discharge of effluent into Budha Nallah cannot be achieved except with the issuance of directions. It is a fit case to

invoke the provisions of section 33-A of the Water (Prevention and Control of Pollution) Act, 1974 for issuance of suitable directions to the SPV operating the CETP of 50 MLD capacity at Tajpur Road, Ludhiana. Hence, the Chairman of the Board in exercise of the powers conferred u/s 33-A of the Water (Prevention and Control of Pollution) Act, 1974 decided to issue the following directions to the SPV of CETP of 50 MLD capacity:

- a) The SPV shall meet with the prescribed discharge standards and to comply with the disposal conditions mentioned in the Environmental Clearance granted by the Ministry of Environment, Forest and Climate Change dated 03.05.2013.
- b) The SPV shall immediately stop the discharge of effluent from the CETP of 50 MLD capacity into Buddha Nallah or any other surface water body.

Apart from the issuance of directions u/s 33-A of the Water (Prevention and Control of Pollution) Act, 1974 to the SPV of 50 MLD CETP as mentioned above it was also decided to impose the Environmental Compensation since the start of CETP considering continued violations being committed by the SPV by way of discharging its effluent into the Budha Nallah in violation of the conditions of Environmental Clearance granted by the Ministry of Environment, Forest and Climate Change by adjusting the period / amount of the EC already imposed by the Board and deposited by the SPV.

16) Accordingly, directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 was issued to the SPV vide Board's letter no. 5802-03 dated 25.09.2024.

17) It is pertinent to mention here that the Hon'ble Supreme Court of India has considered the concept of Polluter Pays Principle in Indian Council for Enviro Legal Action and Others v/s Union of India and Others (1996) 3SCC 212, Vellore Citizens Welfare Forum v/s Union of India (1996) 5 SCC 647 and held that Polluter Pay's Principle is accepted principle and part of environmental law of the country even without specific statute.

18) It is mentioned that from period 09.06.2022 (i.e. date of commissioning of CETP) to 18.09.2024 (date of hearing), the amount of Environmental Compensation (EC) was calculated as Rs. 2,49,90,000/- as per following details:

EC	=	PI x N x R x S x LF
PI	=	Violation under Water Act, 1974 by red category unit = 32
N	=	Number of days = 833 (09.06.2022 to 18.09.2024)
R	=	A factor in Rupees = 500 (Large Scale red category project)
S	=	Large Scale project = 1.5
LF	=	Municipal Corporation i.e. Ludhiana having population between one million to five million = 1.25
EC	=	32 x 833 x 500 x 1.5 x 1.25 = Rs. 2,49,90,000/- (Rs. Two Crore Forty Nine Lac Ninety thousand only)



19) Thus, in view of the above recorded facts, the matter was considered for imposition of Environmental Compensation for the period of violation from 09.06.2022 to 18.09.2024 in accordance with the formula and methodology evolved by the Central Pollution Control Board and adopted by the Punjab Pollution Control Board. The amount of Environmental Compensation for the period of violation from 09.06.2022 to 18.09.2024 (833 days) was calculated as Rs. 2,49,90,000/- (Rs. Two Crore Forty Nine Lac Ninety thousand only).

20) And whereas, the Environmental Compensation of Rs. 2,08,30,000/- (Two Crore Eight Lac Thirty Thousand Only) has already been imposed on the SPV, as per details given in the order above.

21) Hence, the amount of Rs. 41,60,000/- (i.e. amount after subtracting from total amount of EC calculated and EC imposed) is hereby imposed on the SPV. Therefore, the SPV is directed to deposit an amount of Rs. 41,60,000/- (Rs. Forty One Lac Sixty Thousand only) as Environmental compensation with the office of the Punjab Pollution Control Board within 15 days, from the date of receipt of this order, failing which, the Board shall be constrained to initiate necessary action for recovery of the amount of Environmental Compensation by adopting coercive measures, thereafter.

22) Take notice that no further intimation or reminder will be issued by the Board in this regard. Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana is directed to ensure compliance of directions issued in the case. A copy of this order be supplied to all the concerned for compliance.

Adarsh Pal Vig
(Prof. (Dr.) Adarsh Pal Vig)
Chairman



ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਰੋਕਥਾਮ ਬੋਰਡ
PUNJAB POLLUTION CONTROL BOARD



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Ph No. 0161-2670141

No. PPCB/SEE/ZO-2/LDH/2025/5375

Registered

Dated 15/09/2025

To

The Chairman,
Punjab Dyers Association 50 MLD CETP Plant,
Backside Central Jail, Tajpur Road, Ludhiana.

Subject: Imposition of Environmental Compensation upon M/s Punjab Dyers Association 50 MLD CETP Plant, Backside Central Jail, Tajpur Road, Ludhiana for violation of the provisions of Water (Prevention & Control of Pollution) Act, 1974.

Please find enclosed order no. 412 dated 11.09.2025 passed by the Competent Authority of the Punjab Pollution Control Board, whereby, the Environmental Compensation amounting to Rs. 69,00,000 /- (Rs. Sixty Nine Lacs) has been imposed upon the Special Purpose Vehicle (SPV) i.e. Punjab Dyers Association (50 MLD CETP) for violation of the provisions of Water (Prevention & Control of Pollution) Act, 1974 for the period from (19.09.2024 to 06.05.2025), for information and compliance. It is requested to deposit the Environmental Compensation, within 15 days, from the date of receipt of this order.

DA/as above

Endst. No. 5376

Kuldeep Singh
Environmental Engineer

Dated 15/09/2025

A copy of the above alongwith order no. 412 dated 11.09.2025 is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana for information and necessary action. He is requested to get the copy of the above said order received by the SPV.

DA/as above

Kuldeep Singh
Environmental Engineer



ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਕੰਟਰੋਲ ਬੋਰਡ

PUNJAB POLLUTION CONTROL BOARD

No. 412

Dated. 11/19/22

Subject: Imposition of Environmental Compensation upon M/s Punjab Dyers Association 50 MLD CETP Plant, Backside Central Jail, Tajpur Road, Ludhiana for violation of the provisions of Water (Prevention and Control of Pollution) Act, 1974

Order

The Punjab Pollution Control Board being the statutory regulatory authority is implementing the provisions of the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 and the rules made there under in the State of Punjab. The main objective of the Board is maintaining or restoring the wholesomeness of water, the preservation of the quality of air and the protection and improvement of the environment.

2) The Government of India, Ministry of Environment, Forest & Climate Change (MoEF&CC) has declared various clusters in the Country as Critically Polluted Areas (CPA), Severely Polluted Area (SPA) based on Cumulative Environmental Pollution Index (CEPI) score. Due to increased industrialization, activities of the Industrial units and some other identical reasons, Ludhiana city has been declared as Critically Polluted Area by the Central Pollution Control Board.

3) Briefly stated that the Punjab Dyers Association (PDS) Ludhiana has setup a Common Effluent Treatment Plant (CETP) of Capacity 50 MLD for treatment of waste water from the cluster of textiles dyeing industries located at Tajpur Road, Ludhiana. The Special Purpose Vehicle (SPV) was granted consent to operate under Water (Prevention & Control of Pollution) Act, 1974, vide no. CTOW/Fresh/ LDH3/2022/18475759 dated 23.08.2022, valid upto 22.08.2023.

4) The Ministry of Environment, Forest and Climate Change (MoEF&CC) vide letter file no. Q-15017/17/2017-CPW dated 11.11.2019 had released Grand-in-Aid for setting up of 50 MLD CETP at Tajpur Road, Ludhiana, subject to following conditions:

- 1) PDA will operate the CETP to comply with the parameters as proposed in the DPR and as per the undertaking submitted to the Punjab Pollution Control Board.
- 2) PDA will install suitable tertiary treatment unit with the CETP to achieve effluent discharge standards of BOD 10 mg/l and COD 50 mg/l at their own cost within six months time of commissioning and not later than December, 2020.
- 3) The CETP will not discharge its effluent into Buddha Nallah and it will reuse either

ਵਾਤਾਵਰਣ ਭਵਨ, ਨਾਭਾ ਰੋਡ, ਪਟਿਆਲਾ - 147001

Vatavaran Bhawan, Nabha Road, Patiala - 147001

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into the back process or irrigation by laying their own network at their own cost.

- 5) The Punjab Pollution Control Board is monitoring the SPV since the date of its inception. The CETP is not meeting with the standards prescribed in the DPR of the project. The project is also not meeting with the standards prescribed by the MoEF&CC, specifically with respect to TDS parameter. At times, the SPV also failed to qualify the standards prescribed for other parameters with respect to MoEF&CC standards. The parameters being observed at the inlet of CETP are also not meeting with the designed parameters prescribed by the SPV in the DPR submitted to the MoEF&CC at the time of availing grant in aid.
- 6) The Punjab Pollution Control Board issued notices alongwith opportunity of personal hearings to the SPV from time to time due to the various non-compliance including achievement of standards as mentioned in the DPR submitted to the MoEF&CC while obtaining grant-in-aid as well as for not achieving MoEF&CC standards prescribed for CETP (textile sector). The SPV had been directed by the Board to achieve the prescribed standards from time to time.
- 7) Further, due to above violations, it was decided to file complaint under the provisions of the Water (Prevention & Control of Pollution) Act, 1974 against the SPV and its responsible persons. Complaint had already been filed by the Board in the Competent Court of Law.
- 8) Due to continuous violations, the SPV was afforded opportunities of personal hearings on 09.08.2023, 30.10.2023, 12.02.2024, 14.06.2024 and 18.09.2024 and as per the decisions of the said hearings, the SPV was imposed Environmental Compensation amounting to Rs. 1,24,50,000/- vide order no. 383 dated 04.09.2024 for the period of 09.06.2022 to 28.07.2023, the Environmental Compensation amounting to Rs. 25,00,000/- vide order no. 380 dated 03.09.2024 (as per the decision of the personal hearing dated 14.06.2024) and the Environmental compensation amounting to Rs. 58,80,000/- (Rs. 18,30,000/- for period of 01.08.2023 to 30.09.2023 and amounting to Rs. 40,50,000/- for period of 01.10.2023 to 12.02.2024) vide order no. 465 dated 27.11.2024 and Rs. 41,60,000/- vide order 513 dated 31.12.2024, totalling to Rs. 2,49,90,000/-, but the SPV failed to deposit the Environmental Compensation till date by the Board.
- 9) Thereafter, the Board has also got conducted a 3rd party monitoring of CETP from "Shri Ram Institute for Industrial Research" on 13.11.2024. Analysis results revealed that the CETP is not meeting with the MoEF&CC standards with respect to TDS / FDS parameter (2276



mg/l against 2100 mg/l) and BOD parameter (38 mg/l against 30 mg/l). Also, as per the results, the effluent being received at the inlet of the CETP is not meeting with the inlet design parameter of the CETP. Hence, the CETP is not achieving the standards as per MoEF&CC criteria. CETP is also not achieving the stringent standards on the basis of which it has been designed as per the DPR submitted with the MoEF&CC while availing the grant-in-aid from the Ministry.

10) The SPV also filed an appeal case no. 41/2024 before Hon'ble NGT against the directions issued by the Board to stop discharge of 50 MLD CETP into Budha Nallah or any other surface water body. The said matter came up for hearing on 04.11.2024 and next date of hearing was fixed on 02.12.2024. The relevant part of the order is reproduced as under:

“12. Pressing the prayer for interim relief Learned Counsel for the appellant has submitted that impugned orders will result in shutting down all the industries connected with the CETP in question. Considering the circumstances of the case we direct that till the next date of hearing no coercive steps in pursuant to the impugned order will be taken subject to compliance of environmental norms and clearance conditions. “

11) Notice to issue directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988 was issued to the SPV with an opportunity of personal hearing before Chairman of the Board on 08.01.2025. This hearing was postponed to 14.01.2025, wherein it was decided as under:-

1. *The SPV shall comply with the directions issued by the Board u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 vide no. 5805 dated 25.09.2024.*
2. *The SPV shall comply with the conditions of Environmental Clearance, conditions stipulated by MoEF&CC while allowing grant-in-aid and to ensure compliance of environmental norms.*
3. *Complaint be filed in the Competent Court of Law against the Punjab Dyers Association (50 MLD CETP), its directors and persons responsible for operation of the CETP and other governing activities related to CETP for not complying with the environmental norms.*
4. *Environmental Compensation be imposed on the SPV for continued violation w.e.f. 19.09.2024 till date of this hearing. Environmental Engineer, Regional Office-3, Ludhiana shall calculate the Environmental Compensation to be imposed on the SPV and place the matter for approval of Competent Authority, within 15 days.*
5. *Environmental Engineer, Regional Office-3, Ludhiana shall submit the compliance of the decisions of the personal hearing immediately after 15 days alongwith latest status and further recommendations in the matter.*



12) The SPV is not complying with decisions of personal hearings afforded to it before the Chairman of the Board from time to time w.r.t submission of Environmental Compensation and thus the SPV was violating the provisions of the said Act, due to above said reasons.

13) In the past also many instances of leakages from the manholes of the conveyance system of the PDA were reported, resulting in the stagnation on roads and unauthorized discharge of untreated effluent into Buddha Nallah. The SPV was not only issued instant advisories to mitigate the problem but also afforded opportunities of personal hearing before the Chairman of the Board to explain its position. The SPV was directed vide Board's letter no 4888-89 dated 18.07.2022 to submit adequacy certificate of the conveyance system of the CETP form the PWSSB. But the SPV has failed to submit the same till date despite repeated advisories in the hearings afforded to the SPV by the Chairman of the Board. Further, in a hearing dated 14.06.2024, the PDA was also directed to submit bank guarantee of Rs. 50 Lakh as an assurance that in future, there will be no overflow from the PDA sewer line / manhole in the area to avoid stagnation of effluent on roads/ in vacant plots of the area. Also, an environmental compensation amounting to Rs. 25.0 lakh was also imposed. However, the SPV failed to submit the said bank guarantee as well as the environmental compensation to the Board, till date.

14) The SPV applied for renewal of 'Consent to Operate' under the Water (Prevention & Control of Pollution) Act, 1974 for operation of CETP 50 MLD with discharge of treated effluent into Buddha Nallah.

15) In light of above violations, notice to issue directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 alongwith show cause notice for refusal of consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 and show cause notice for non-submission of Environmental Compensation imposed on the SPV from time to time by the Board for violation of the provisions of environmental laws was issued to the SPV with an opportunity of personal hearing before Chairman of the Board on 18.03.2025 postponed to 04.04.2025.

16) The chair observed that the CPCB has visited the CETP during 24.12.2024-25.12.2024 in compliance with the directions of the Hon'ble NGT in the matter of O.A. no. 225/2022, Nitin Dhiman v/s State of Punjab & Ors. with O.A. no 546 of 2024. During visit, the CPCB observed similar non-compliances as observed during April 22-23, 2024 and thus vide letter



dated 19.03.2025 has issued instructions to the PPCB to ensure compliance of the directions issued by the CPCB, earlier, vide letter dated 12.08.2024 u/s 18(1)(b) of the Water (Prevention & Control of Pollution) Act, 1974 and the compliance of the directions issued by the PPCB u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 in this regard. Accordingly, the Chairman of the Board decided that the matter needs to be reheard also in light of instructions issued by the CPCB u/s 18(1)(b) of the Water (Prevention & Control of Pollution) Act, 1974 vide letter dated 19.03.2025. For that, a separate notice u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 with directions as proposed earlier vide notice of hearing issued to the SPV u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 for the previous violations as well as the violations reported by CPCB during its visit to the CETP on December 24-25, 2024 with an opportunity of personal hearing before Chairman of the Board. The decision on the consent application of the SPV shall be taken in the hearing. Also, the decision on the matter related to non-submission of Environmental Compensation for which notice was issued to the PDA vide letter no. 1421 dated 10.03.2025 shall be taken in the said hearing.

17) After carrying out visit to the four CETPs, the CPCB had submitted compliance report before the Hon'ble NGT, which is now sent to the PPCB to ensure compliance of the directions already issued by the CPCB u/s 18(1)(b) of the Water (Prevention & Control of Pollution) Act, 1974 and by PPCB u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 to stop discharge of the CETP 50 MLD, CETP 40 MLD & CETP 15 MLD into Buddha Daryia and to send the action taken report in the matter. The compliance report submitted by the CPCB before the Hon'ble NGT has been examined and observations of the CPCB with respect to CETP 50 MLD are as under :-

- i) *As per analysis result, the concentration of various parameters are BOD:54 mg/l(Standard:30 mg/l), FDS:2364 mg/l(Standard: 2100 mg/l), Sulphide:2.4 mg/l(Standard:2mg/l), Chloride:1283 mg/l(Standard: 1000 mg/l) and Phenolic Compounds:3.62 mg/l(Standard: 1.0 mg/l, which is beyond the permissible limits as prescribed standard of the MoEF&CC.*
- ii) *The CPCB also observed that the CETP is discharging treated effluent into Buddha Nallah through an underground conveyance channel, which ultimately meets River Sutlej.*
- iii) *As per environment clearance granted to the CETPs, the treated water shall not be discharged into Buddha Nallah. The CETP is not complying with the disposal condition stipulated in the environment clearance issued by Ministry of Environment, Forest and Climate Change.*
- iv) *The overall performance of CETP with regard to removal efficiency of COD, BOD*



and Suspended Solids parameters was found to be 85%, 87% and 71% respectively, which was found adequate to achieve the prescribed norms. However, the overall performance with regard to removal efficiency for BOD, Chloride, Sulphide and Phenolic compounds parameters based on the analyzed concentration of respective parameters was found to be 87%, 20.5%, 25% and 0% respectively, requires improvement to achieve to prescribed limits.

- v) The biomass concentrations in the SBR basin in terms of MLSS and MLVSS were found as 5456 mg/l and 2849 mg/l respectively. The MLVSS/MLSS ratio was found to be 0.52, which is lower than the recommended ratio of 0.6-0.8. The MLVSS/MLSS ratio between 0.6-0.8 indicates satisfactory operation of biological treatment system (SBR).
- vi) The CPCB also observed that Online Continuous Effluent monitoring system (OCEMS) is installed at inlet and final outlet of CETP for measuring PH, TSS, COD and BOD, which was last calibrated on May 12, 2024 and a wide variation was observed in the lab analysis values and the OCEMS values on the day of inspection. The OCEMS values for TSS, COD and BOD were found to be 28% to 70% lower in comparison to laboratory analysis value, indicating improper calibration of OCEMS.

18) In light of above, the CPCB has directed the Punjab Pollution Control Board to ensure compliance of the directions already issued by the CPCB 18(1)(b) of the Water (Prevention & Control of Pollution) Act, 1974 on 12.08.2024 as well as the directions issued by the PPCB u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 for compliance of the directions issued by the CPCB on 12.08.2024, in a time bound manner.

19) The CETP is yet to achieve the stringent standards proposed in the DPR of the CETP submitted at the time of appraising their project for financial assistance by the MoEF&CC, Government of India. Further, the CETP has failed to achieve the standards prescribed by MoEF&CC for discharge of effluent from textile units inland surface water bodies w.r.t one parameter or other. The CETP has not been able to achieve the FDS/TDS parameter of 2100mg/l as prescribed by MOEF&CC.

20) Notice to issue earlier proposed directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 alongwith show cause notice for refusal of consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 and show cause notice for non-submission of Environmental Compensation imposed on the SPV from time to time by the Board



for violation of the provisions of environmental laws was issued to the industry with an opportunity of personal hearing before Chairman of the Board on 06.05.2025.

21) It was further brought out that a video has been surfaced online and received by the Board on 30.04.2025, highlighting the discharge of colored effluent from 50 MLD CETP into Buddha Nallah. To this, CETP representatives present during the hearing informed that the treated effluent exhibits a yellowish tinge at the outlet, which becomes apparent when mixed with the fresh canal water in Buddha Nallah, resulting in a noticeable color difference throughout the day. However, when the treated effluent is collected in a jar, it appears almost clear. They further informed that as per the samples collected by Shri Ram Laboratories, the color parameter at the outlet of CETP has been found to be within the prescribed limits. It was informed that the Regional Office has also visited the site on 30.04.2025 i.e. on the day when the video was received and the report received from the Regional Office corroborates the above version / findings.

22) After hearing the representative of the SPV, officers of the Board and considering the material facts of the case, the Chairman of the Board decided as under:-

1. *In compliance to the instructions dated 09.03.2025 issued by CPCB, in continuation of its earlier directions dated 12.08.2024 issued to the PPCB u/s 18 (1) (b) of the Water (Prevention & Control of Pollution) Act, 1974, SPV shall:-*
 - (a) *Comply with the directions issued by the Board u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 vide no. 5805 dated 25.09.2024 for stoppage of the discharge of effluent from CETP into Buddha Nallah and to comply with the environmental norms alongwith other directions mentioned therein.*
 - (b) *Adopt alternative mode of disposal immediately for the treated effluent and shall subsequently submit a comprehensive Action Taken Report (ATR) to the Board outlining the measures implemented in this regard, within one month.*
 - (c) *Comply with the other observations / finding of the CPCB as mentioned in their communication dated 09.03.2025 and as mentioned in the relevant paragraphs of these proceedings.*
 - (d) *Comply with the conditions stipulated by MoEF&CC while allowing grant-in-aid to the SPV and to ensure compliance of environmental norms and environmental standards.*
2. *The operational capacity of the CETP is curtailed by 20 percent of the total installed capacity in view of non-compliance of the environmental standards. The SPV shall make in-house mechanism to ensure that the CETP shall not be operated beyond 80% of its installed capacity and issue requisite instructions to its member units in this regard and submit Action Taken Report immediately.*



3. *No new NOC or NOC for expansion or varied consent to operate for increase in the discharge of the trade effluent shall be granted to the member units connected with the CETP except in the cases of scattered industrial units operating in non-CETP governed areas/ non-designated areas of city to whom Board has issued directions for shifting to CETP areas.*
4. *The SPV shall ensure that the designed DPR parameters are achieved at the inlet of the CETP so as to improve the efficiency of CETP and achieve the design as well as prescribed standards at the outlet. For that,*
 - (a) *The SPV shall ensure that no member unit discharges the effluent from its outlets into the CETP of 50 MLD capacity, which is not meeting with inlet design standards of the CETP. The SPV shall further prepare and place mechanism for identification of such member units.*
 - (b) *The SPV shall issue directions to the member units to impart suitable pre-treatment to the effluent so as to ensure that the effluent discharged by the member units in the dedicated conveyance system of the CETP complies with the designed inlet parameters proposed in the DPR.*
 - (c) *SPV and member units shall explore the possibility of segregating high TDS streams at industry level and provide pre-treatment to bring the parameters at the outlet of the industry within the designed DPR parameters prescribed at the inlet of CETP.*
 - (d) *In case of non-compliance of DPR inlet standards by the member units, the SPV shall take necessary punitive actions against the member units and inform the Board, accordingly.*
5. *The SPV shall deposit the environmental compensation of Rs. 2,49,90,000/- earlier imposed by the Board and already conveyed to the SPV, within 15 days, failing which the matter shall be referred to the Revenue Authorities for recovery of the same.*
6. *Environmental Compensation shall be imposed on the SPV for non-compliance of environmental norms for a further period from 19.09.2024 to 06.05.2025.*
7. *The SPV shall immediately make arrangements for installation of advance mechanism for decolorization of treated effluent of CETP as well as to provide tertiary treatments as directed by MoEF&CC while allowing grant in aid to the SPV and submit Action Taken Report, within 15 days.*
8. *The SPV shall submit adequacy certificate of the conveyance system provided at site from the Department of PWSSB as per directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 vide Board letter no. 4888-89 dated 18.07.2022, within one month.*
9. *The SPV shall submit bank guarantee of Rs. 50 Lakh as an assurance that in future, there will be no overflow from the PDA sewer line / manhole in the area to avoid stagnation of effluent on roads/ in vacant plots of the area, immediately in*



compliance of decisions of the personal hearing on 14.06.2024.

10. *The decision on the consent application submitted by the SPV under the Water Act, 1974 and the Air Act, 1981 shall be taken after the compliance by the SPV with respect to decision as above.*
11. *Environmental Engineer, Regional Office-3, Ludhiana shall submit the compliance of the decisions of the personal hearing as per time schedule alongwith latest status and further recommendations in the matter including that to decide the consent applications. He shall also calculate the environmental compensation for a further period from 19.09.2024 to 06.05.2025 and place the matter for getting the same verified from the EC Verification Committee.*

The proceedings of the hearing were conveyed to the industry vide letter no. 3283 dated 15.05.2025 for compliance.

10) The present order is being passed in compliance to the decisions taken during the hearing held on 06.05.2025 for imposition of environmental compensation. It is pertinent to mention here that the Hon'ble Supreme Court of India has considered the concept of Polluter Pay's Principle in Indian Council for Enviro Legal Action and Others v/s Union of India and Others (1996) 3SCC 212, Vellore Citizens Welfare Forum v/s Union of India (1996) 5 SCC 647 and held that Polluter Pay's Principle is accepted principle and part of environmental law of the country even without specific statute. The Principle of sustainable development and precaution are also held to be the accepted principles and part of environmental laws.

11) The CETP is operating without the valid consent of the Board under the Water (Prevention & Control of Pollution) Act, 1974 and is not complying with the directions issued by the Board as explained herein above and the industry is also not cooperating with the officers of the Board. These facts are sufficient for the imposition of Environmental Compensation by invoking the Principles of Polluter Pays, sustainable developments and precaution. The industry has, thus, made itself liable for Environmental Compensation for the period of violation from 19.09.2024 to 06.05.2025.

12) Thus, in view of the above recorded facts, the matter was considered for imposition of Environmental Compensation for the period of violation from 19.09.2024 to 06.05.2025 in accordance with the formula and methodology evolved by the Central Pollution Control Board and adopted by the Punjab Pollution Control Board. The amount of Environmental Compensation for



the period of violation from 19.09.2024 to 06.05.2025 (230 days) was calculated to be Rs. 69,00,000/- as per the following details:

Particulars	Values	
EC	PI x N x R x S x LF	
PI	32	Being violation of only Water Act, 1974
N	230	from 19.09.2024 to date of hearing i.e. 06.05.2025
R	500	Since unit is large scale unit
S	1.5	For large scale unit
LF	1.25	As per criteria given for industrial units
EC	$32 \times 230 \times 500 \times 1.5 \times 1.25 = 69,00,000/-$	

13) Therefore, the industry M/s Punjab Dyers Association 50 MLD CETP Plant, Backside Central Jail, Tajpur Road, Ludhiana is hereby directed through its Director to deposit an amount of Rs. 69,00,000/- as Environmental compensation for the period of violation from 19.09.2024 to 06.05.2025 with the office of the Punjab Pollution Control Board within 15 days, from the date of receipt of this order, failing which, the Board shall be constrained to initiate necessary action for recovery of the amount of Environmental Compensation by adopting coercive measures, thereafter.

14) Take notice that no further intimation or reminder will be issued by the Board in this regard. Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana is directed to ensure compliance of directions issued in the case. A copy of this order be supplied to all the concerned for compliance.


 (Reena Gupta)
 Chairperson



Website:- www.ppcb.gov.in

Punjab Pollution Control Board

Zonal Office-2, E-648-B, Phase-V,
Focal Point, Ludhiana

E-mail: seezo2ldhppcb@yahoo.com

No. 5057
To

Date 08/09/2025

The Deputy Commissioner,
Ludhiana

Subject: Recovery of Environmental Compensation imposed on M/s Punjab Dyers Association, Tajpur Road, Ludhiana for the violations of the provisions of Water Act, 1974 with respect to the operation of 50 MLD CETP established for the dyeing cluster of Tajpur Road, Ludhiana.

The Punjab Dyers Association (PDA), a Special Purpose Vehicle (SPV) is responsible for the establishment, up-gradation, operation and maintenance of 50 MLD CETP for treatment of waste water from the cluster of textiles dyeing industries located at Tajpur Road in Ludhiana and has been operational since June, 2022.

- 2) The SPV was granted Environmental Clearance by the Ministry of Environment, Forest and Climate Change (MoEF&CC) vide letter no. F.No.10-92/2010-IA.III dated 03.05.2013 for establishment of Common Effluent Treatment Plant for treatment of trade effluent of cluster of dyeing units of Ludhiana with certain conditions as mentioned therein.
- 3) The Ministry of Environment, Forest and Climate Change (MoEF&CC) released Grant-in-Aid to the SPV for Special Purpose Vehicle (SPV) for setting up of 50 MLD CETP at Tajpur Road, Ludhiana. The said grant was released based on the Detailed Project Report (DPR) submitted by the SPV, which was based on achieving stringent environmental standards.
- 4) The Punjab Pollution Control Board is monitoring the CETP since the date of its inception. This CETP is also monitored by Centre Pollution Control Board, New Delhi. A third party monitoring was also got conducted.
- 5) The CETP is not achieving the standards as mandated by the MoEF&CC, Govt. of India for discharge of effluent in surface water bodies. The CETP as well as is not achieving the design parameters and stringent standards proposed in the DPR submitted at the time of appraising their project for financial assistance by the MoEF&CC, Government of India, for utilizing treated effluent on to land for irrigation. The CETP is not complying with the Environmental Clearance conditions granted to it.
- 6) The Punjab Pollution Control Board has issued number of notices along with opportunities of personal hearings to the SPV from time to time due to the various non-compliances including non-achievement of standards. The SPV had been directed by the Board to achieve the prescribed standards from time to time.

7) Due to the above stated violations, the SPV was afforded opportunities of personal hearings on 09.08.2023, 30.10.2023, 12.02.2024, 14.06.2024 and 18.09.2024 before the competent Authority. As per the decisions of the hearings, the SPV was imposed Environmental Compensation amounting to Rs. 1,24,50,000/- vide order no. 383 dated 04.09.2024 for the period of 09.06.2022 to 28.07.2023, the Environmental Compensation amounting to Rs. 25,00,000/- vide order no. 380 dated 03.09.2024 (as per the decision of the personal hearing dated 14.06.2024) and the Environmental compensation amounting to Rs. 58,80,000/- (Rs. 18,30,000/- for period of 01.08.2023 to 30.09.2023 and amounting to Rs. 40,50,000/- for period of 01.10.2023 to 12.02.2024) vide order no. 465 dated 27.11.2024 and Rs. 41,60,000/- vide order 513 dated 31.12.2024, totalling to **Rs. 2,49,90,000/-**. A copy of EC orders is also enclosed herewith.

8) Further, notice to issue directions for closure u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 along with show cause notice for refusal of consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 and show cause notice for non- submission of Environmental Compensation imposed on the SPV from time to time by the Board for violation of the provisions of environmental laws was issued to the industry with an opportunity of personal hearing before Chairman of the Board on 06.05.2025, wherein along with other directions it was decided that the SPV shall deposit the environmental compensation amounting to Rs. 2,49,90,000/- as imposed by the Board and already conveyed to the SPV, within 15 days.

9) The SPV was lastly afforded an opportunity of personal hearing before issuing directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 as mentioned in the notice, with an opportunity of personal hearing before the Chairperson of the Board on 10.07.2025, wherein it was decided that the SPV shall deposit the environmental compensation of Rs. 2,49,90,000/- as imposed by the Board and already conveyed to the SPV, within 15 days, failing which the matter shall be referred to the Revenue Authorities for recovery of the same.

10) The SPV also filed an appeal before Hon'ble NGT against the directions issued by the Board to stop discharge of 50 MLD CETP into Buddha Nallah or in any other surface water body and also against the Environmental Compensation imposed by the Board. The Hon'ble NGT in its last hearing held on 22.07.2025 has directed to place on record the full details relating to the calculation of environmental compensation and status of its recovery. A copy of order Hon'ble NGT dated 22.07.2025 is also enclosed herewith for kind perusal.

11) The SPV till date has failed to deposit the Environmental Compensation of **Rs. 2,49,90,000/-** despite of continuous efforts made by the Board, as detailed above.

12) In view of above, it is requested to direct the concerned Revenue Authority to recover the Environmental Compensation of **Rs. 2,49,90,000/-** from M/s Punjab Dyers Association, Tajpur Road, Ludhiana in accordance with law of Punjab Land Revenue Act or any other Act for the time being in force, please

This issues with the approval of the Chairperson of the Board.

DA/As above

dir/eps
 dc Senior Environmental Engineer
 For & on behalf of Chairperson, PPCB
 CA

Dated..08/09/25

Endst. No...5258...

A copy of the above is forwarded to the Secretary to Govt. of Punjab, Department of Science, Technology and Environment, for kind information please.

dir/eps
 dc Senior Environmental Engineer
 For & on behalf of Chairperson, PPCB
 CA

Imposition of Environmental Compensation and status of its recovery: 40 MLD CETP, Focal Point Module, Ludhiana

Date of commissioning of CETP	Total Period for which EC has been Imposed	Detail of Orders vide which EC was imposed	Total Amount of EC imposed (in Rs.)	Amount of EC Recovered (in Rs.)
January, 2022	04.01.2022 to 06.05.2025	i. Order no. 80 dated 17.03.2025 for Rs. 2,96,70,000/- ii. Order dated 411 dated 11.09.2025 for Rs. 69,00,000/-	3,65,70,000/-	Rs. 75,00,000 /- has been recovered.

Note:

1. The Environmental Compensation imposed by the Board has been calculated in accordance with the formula and methodology evolved by the Central Pollution Control Board.
2. The Punjab Dyers Association, Tajpur Road, Ludhiana has been requested in the hearings held on 06.05.2025 and 10.07.2025 to deposit the amount of Environmental Compensation with the Board.
3. Letter no. 4466-67 dated 09.09.2025 has been written to Deputy Commissioner Ludhiana for effecting the recovery of the amount of Environmental Compensation as arrears of Land revenue.
4. The orders mentioned above are collectively been enclosed as **Annexure-D**.

 <p>PUNJAB POLLUTION CONTROL BOARD Zonal Office-1, E-648-B, Phase-V, Focal Point, Ludhiana Tele Fax:- 0161-4673789 Website:- www.ppcb.gov.in email:- ppcbzo1ldh@gmail.com</p>	<p><i>Send this current S/P Mail sent on 17/3/25</i></p>
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No.

To

M/s Punjab Dyers Association (Focal Point Module),
 Tajpur Road, Jamalpur Awana,
 Ludhiana.

Subject:- Imposition of Environmental Compensation upon CETP of capacity 40 MLD (Focal Point Module) for violation of the provisions of Environmental Laws.

Ref:- Board's order no. 80 dated 17.03.2025.

Please find enclosed a copy of order no. 80 dated 17.03.2025 passed by the Competent Authority of the Punjab Pollution Control Board, in which Environmental Compensation amounting to Rs. 2,21,70,000/- (Rs. Two Crore Twenty One lac Seventy Thousand only) has been imposed upon the SPV for violation of the provisions of Environmental Laws for the period from 04.01.2022 to 18.09.2024 (989 days).

You are therefore, requested to deposit the Environmental Compensation amounting to Rs. 2,21,70,000/- in the office of Environmental Engineer, Regional Office-1, Ludhiana, immediately, please.

DA/ Order no. 80 dated 17.03.2025

Addl. Senior Environmental Engineer

Endst. No. 1779

Dated 18/3/25

A copy of the above is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-1, Ludhiana for information and ensure compliance of directions issued vide order no. 80 dated 17.03.2025. It is also requested to get delivered an order no. 80 dated 17.03.2025 to the SPV, please.

DA/ Order no. 80 dated 17.03.2025

Addl. Senior Environmental Engineer



ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਕੰਟਰੋਲ ਬੋਰਡ
PUNJAB POLLUTION CONTROL BOARD

No. 80

Dated. 17/3/25

Subject: Imposition of Environmental Compensation upon CETP of capacity 40 MLD (Focal Point Module) for violation of the provisions of Environmental Laws.

Order

The Punjab Pollution Control Board being the statutory regulatory authority is implementing the provisions of the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 and the rules made there under in the State of Punjab. The main objective of the Board is maintaining or restoring the wholesomeness of water, the preservation of the quality of air and the protection and improvement of the environment.

2) The Ministry of Environment, Forest & Climate Change (MoEF&CC), Government of India has declared various clusters in the Country as Critically Polluted Areas (CPA), Severely Polluted Area (SPA) based on Cumulative Environmental Pollution Index (CEPI) score. Due to increased industrialization, activities of the Industrial units and some other identical reasons, Ludhiana city has been declared as Critically Polluted Area by the Central Pollution Control Board.

3) Briefly stated that the Punjab Dyers Association (PDA) Ludhiana has setup a Common Effluent Treatment Plant (CETP) of capacity 40 MLD for treatment of waste water from the cluster of textiles dyeing industries located at Focal Point, Ludhiana. The CETP has been commissioned and the trial run of the CETP was started on 19.10.2021 and the CETP was formally inaugurated by the State Government on 04.01.2022.

4) The Special Purpose Vehicle (SPV) was granted consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 vide no. CTOW/Renewal/LDH4/2023/22538966 dated 24.06.2023, valid upto 23.09.2023 for discharge of trade effluent @ 40,000 KLD into Buddha Nallah after treatment through CETP of 40 MLD (Focal Point Module) and domestic effluent @ 1.5 KLD onto land for plantation after passing through septic tank.

ਵਾਤਾਵਰਣ ਭਵਨ, ਨਾਭਾ ਰੋਡ, ਪਟਿਆਲਾ-147001

Vatavaran Bhawan, Nabha Road, Patiala -147001

Phone : Chairman. : 0175-2215793, Member Secretary : 0175-2215802 (O)

Website : www.ppcb.gov.in | E-Mail : chairmanppcb@yahoo.in | msppcb@gmail.com |



- 5) The SPV has failed to comply with the decisions of personal hearing dated 10.11.2022 and has not deposited Environmental compensation of Rs. 2,33,40,000/- (Rs. Two Crores Thirty-Three Lakhs and Forty Thousand Only) for delay in commissioning of CETP, with the office of the Board till date. The SPV has not submitted feasibility report to reuse treated effluent onto land for irrigation. The STP has not constructed a proper outlet before discharge of treated effluent into Budha Nallah from where effluent sample can be collected and has not yet installed one set of additional OCEMS at the said location.
- 6) There is over discharge by member industries into CETP of 40 MLD and there are 24 industries which have discharged effluent more than the consented capacity. Out of the 24 industries, 02 member industries are exceeding their limits consistently from 01.04.2023 to 28.02.2023 namely M/s Superfine Knitters Ltd., C-5, Focal Point, Dhandari Kalan, Ludhiana 20 times over discharge & M/s Lovely Fabrics and Processors Pvt. Ltd., B-55, Phase- VII, Focal Point, Ludhiana 14 times over discharge. On 13.04.2023 M/s Ramal Industries was observed by-passing its trade effluent into municipal sewer. Prior to 13.04.2023, many industries were working at about 60% of their production capacity (i.e. minimum payment criteria of CETP). After 13.04.2023, the effluent of industries has been increased by more than 20% and in some cases by more than 50%. The sudden increase in volume also indicate that these industries may be discharging their effluent into municipal sewer. The PDA has failed to segregate the effluent of their member units from municipal sewer and regular by-pass are being identified on and off.
- 7) The final outlet of the CETP 40 MLD at Tajpur Road CETP was visited by Hon'ble Member of Parliament (Rajya Sabha) Sant Baba Balbir Singh Seechewal and Hon'ble Member of Legislative Assembly Punjab Sh. Daljit Singh Grewal, Chairman Vidhan Sabha Committee constituted on 08.06.2023 for the issues related to Buddha Nallah and Ghaggar Nadi along with the officers of the Board and District Administration. During visit, it was observed that at the outlet of CETP in Buddha Nallah, effluent was coming at comparable slow pace with lesser quantum than the normal discharge with having blackish colour. The team then visited the CETP 40 MLD and observed that the decanting near the outlet of CETP was not in process. The sample of effluent collected from the tank after Chlorine contact



tank collected during visit was also of blackish colour and was leading to the final outlet into Buddha Nallah. The physical condition of the current samples, previous analysis results reveals that the CETP is not working effectively and efficiently. Moreover, the physical condition of the chlorine contact tank shows considerable quantity of solids are settled in it. On enquiry, the representative of the CETP stated that the cleaning of clarifier will resolve the issue and it is also scheduled shortly and 2 no. of SBR tanks are already under maintenance.

8) It is pertinent to mention here that monthly effluent samples were collected by the Board from the month of January, 2022 to May, 2023 and as per analysis reports, the concentration of various parameters of the outlet stream were beyond the prescribed limits of MoEF&CC as well as stringent standards prescribed by the Board.

9) Considering the violations, the SPV was issued notice u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988 and for imposition of Environmental Compensation by the Board with an opportunity of personal hearing before Chairman of the Board on 12.06.2023, wherein after hearing the representatives of the industry and the PPCB officers it was decided that Interim EC of Rs. 75 Lacs be imposed on the SPV.

10) And whereas due to continued violations w.r.t. non achievement of standards and violation of the EC conditions the SPV was issued notice u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988 and for imposition of Environmental Compensation by the Board with an opportunity of personal hearing before Chairman of the Board on 18.09.2023, wherein after considering the reply submitted by the SPV and hearing the PPCB officers it was decided that to calculate the Environmental Compensation since the start of CETP considering continued violations being committed by the SPV by way of discharging its effluent into Budha Nallah in violation of the condition of Environmental Clearance granted by the Ministry of Environment, Forest and climate change by adjusting the period/amount of the EC already imposed by the Board and deposited by the SPV.



11) That it is relevant to mention here that the Hon'ble Supreme Court of India has considered the concept of Polluter Pay's Principle in Indian Council for Enviro Legal Action and others v/s Union of India and others (1996) 3 SCC 212 para 16, Vellore Citizens Welfare Forum v/s Union of India (1996) 5 SCC 647 para 12-18 and held that Polluter Pay's Principle is accepted principle and part of environmental law of the country without even specific statute.

12) Above facts are sufficient for the imposition of Environmental Compensation by invoking the Principle of Polluter Pays and the SPV thus made itself liable for Environmental Compensation under the Polluter Pay's Principle for the period of violation from 04.01.2022 to 18.09.2024.

13) Thus, in view of the above recorded facts, the matter was considered for imposition of Environmental Compensation for the period of violation from 04.01.2022 to 18.09.2024 in accordance with the formula and methodology evolved by the Central Pollution Control Board and adopted by the Punjab Pollution Control Board. The amount of Environmental Compensation for the period of violation from 04.01.2022 to 18.09.2024 (989 days) was calculated to be Rs. 2,96,70,000/- as per following details:

EC	=	PI x N x R x S x LF
PI	=	Violation under Water Act, 1974 by red category unit = 32
N	=	Number of days = 04.01.2022 to 18.09.2024 (989 days)
R	=	A factor in Rupees = 500 (Large Scale red category project)
S	=	Large Scale project = 1.5
LF	=	Municipal Corporation i.e. Ludhiana having population between one million to five million = 1.25
EC	=	32 x 989 x 500 x 1.5 x 1.25 = Rs. 2,96,70,000/- (Rs. Two crore Ninety Six Lakhs Seventy Thousand only)

14) And Whereas the SPV has already deposited EC of Rs. 75 Lakhs in compliance to the decision of the hearing dated 12.06.2023. As such the above mentioned amount is to be deducted from total amount of EC from 04.01.2022 to 18.09.2024 in compliance to the decision of the hearing held on 18.09.2024. Therefore, the SPV of 40 MLD CETP is hereby



directed to deposit an amount of Rs. 2,21,70,000/- (Rs. Two Crore Twenty One Lac Seventy Thousand only) as Environmental compensation for the period of violation from 04.01.2022 to 18.09.2024 with the office of the Punjab Pollution Control Board within 15 days, from the date of receipt of this order, failing which, the Board shall be constrained to initiate necessary action for recovery of the amount of Environmental Compensation by adopting coercive measures, thereafter.

15) Take notice that no further intimation or reminder will be issued by the Board in this regard. Environmental Engineer, Punjab Pollution Control Board, Regional Office-1, Ludhiana is directed to ensure compliance of directions issued in the case. A copy of this order be supplied to all the concerned for compliance.

Adarsh Pal Vig
(Prof (Dr). Adarsh Pal Vig)
Chairman



PUNJAB POLLUTION CONTROL BOARD

Zonal Office-1, E-648-B, Phase-V, Focal Point, Ludhiana

Tele Fax:- 0161-4673789 Website:- www.ppcb.gov.in Email:- ppcbzo1dh@gmail.com

No.....

Dated.....

To

M/s Punjab Dyers Associations (Focal Point Module),
CETP (40 MLD),
Tajpur Road, Jamalpur Awana,
Ludhiana

ਮਾਨੀ. ਸਰਾ./ਸੁਨੀ. ਸਰਾ. ਸਟੇਸ਼ਨ
ਸਰਾ. ਵਾਤਾ. ਇੰਜੀ-1,2,3,4

ਡਾਇਲੀ ਨੰ. 2378 ਵਾਤਾ ਇੰਜੀ
ਪਤੀ 16/9/2025

Subject:-

Imposition of Environmental Compensation upon CETP of capacity 40 MLD (Focal Point Module) for violation of the provisions of Environmental Laws.

Please find enclosed herewith the copy of order no. 411 dated 11.9.2025 passed by the Competent Authority of the Punjab Pollution Control Board whereby Environmental Compensation amounting to Rs. 69,00,000/- (Rs. Sixty Nine Lacs only) has been imposed upon the CETP (40 MLD), Focal Point Module for violation of the provisions of Environmental Laws for the period from 19.09.2024 to 06.05.2025 (230 days) for information and compliance.

DA-As above

sld
Environmental Engineer
Zonal Office-1, Ludhiana
Dated.....

Endst. No.

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

DA-As above

sld
Environmental Engineer
Zonal Office-1, Ludhiana
Dated...13.9.25

Endst. No. 4500

A copy of the above is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-1, Ludhiana for information and to ensure the receipt of above orders to the concerned responsible person of the CETP (40 MLD), please.

DA-As above

SS
Environmental Engineer
Zonal Office-1, Ludhiana

ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਕੰਟਰੋਲ ਬੋਰਡ
PUNJAB POLLUTION CONTROL BOARD

411

Dated. 11/9/25

Subject: Imposition of Environmental Compensation upon CETP of capacity 40 MLD (Focal Point Module) for violation of the provisions of Environmental Laws.

Order

The Punjab Pollution Control Board being the statutory regulatory authority is implementing the provisions of the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 and the rules made there under in the State of Punjab. The main objective of the Board is maintaining or restoring the wholesomeness of water, the preservation of the quality of air and the protection and improvement of the environment.

2) The Ministry of Environment, Forest & Climate Change (MoEF&CC), Government of India has declared various clusters in the Country as Critically Polluted Areas (CPA), Severely Polluted Area (SPA) based on Cumulative Environmental Pollution Index (CEPI) score. Due to increased industrialization, activities of the Industrial units and some other identical reasons, Ludhiana city has been declared as Critically Polluted Area by the Central Pollution Control Board.

3) Briefly stated that the Punjab Dyers Association (PDA) Ludhiana has setup a Common Effluent Treatment Plant (CETP) of capacity 40 MLD for treatment of waste water from the cluster of textiles dyeing industries located at Focal Point, Ludhiana. The CETP has been commissioned and the trial run of the CETP was started on 19.10.2021 and the CETP was formally inaugurated by the State Government on 04.01.2022.

4) The Special Purpose Vehicle (SPV) was granted consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 vide no. CTOW/Renewal/LDH4/2023/22538966 dated 24.06.2023, valid upto 23.09.2023 for discharge of trade effluent @ 40,000 KLD into Buddha Nallah after treatment through CETP of 40 MLD (Focal Point Module) and domestic effluent @ 1.5 KLD onto land for plantation after passing through septic tank.

5) The SPV has failed to comply with the decisions of personal hearing dated 10.11.2022 and has not deposited Environmental compensation of Rs. 2,33,40,000/- (Rs. Two Crores Thirty-Three Lakhs and Forty Thousand Only) for delay in commissioning of CETP, with the office of the Board till date. The SPV has not submitted feasibility report to reuse treated effluent onto land for irrigation. The STP has not constructed a proper outlet before discharge of treated effluent into Budha Nallah from where effluent sample can be collected and has not yet installed one set of additional OCEMS at the said location.

6) There is over discharge by member industries into CETP of 40 MLD and there are 24 industries which have discharged effluent more than the consented capacity. Out of the 24 industries, 02 member industries are exceeding their limits consistently from 01.04.2023 to

ਵਾਤਾਵਰਣ ਭਵਨ, ਨਾਭਾ ਰੋਡ, ਪਟਿਆਲਾ - 147001

Vatavaran Bhawan, Nabha Road, Patiala - 147001

Phone : Chairman. : 0175-2215793, Member Secretary : 0175-2215802 (O), 2215636 (FAX)

Website : www.ppcb.gov.in | E-Mail : chairmanppcb@yahoo.in | msppcb@gmail.com |

28.02.2023 namely M/s Superfine Knitters Ltd., C-5, Focal Point, Dhandari Kalan, Ludhiana 20 times over discharge & M/s Lovely Fabrics and Processors Pvt. Ltd., B-55, Phase- VII, Focal Point, Ludhiana 14 times over discharge. On 13.04.2023 M/s Ramal Industries was observed by-passing its trade effluent into municipal sewer. Prior to 13.04.2023, many industries were working at about 60% of their production capacity (i.e. minimum payment criteria of CETP). After 13.04.2023, the effluent of industries has been increased by more than 20% and in some cases by more than 50%. The sudden increase in volume also indicate that these industries may be discharging their effluent into municipal sewer. The PDA has failed to segregate the effluent of their member units from municipal sewer and regular by-pass are being identified on and off.

7) The final outlet of the CETP 40 MLD at Tajpur Road CETP was visited by Hon'ble Member of Parliament (Rajya Sabha) Sant Baba Balbir Singh Seechewal and Hon'ble Member of Legislative Assembly Punjab Sh. Daljit Singh Grewal, Chairman Vidhan Sabha Committee constituted on 08.06.2023 for the issues related to Buddha Nallah and Ghaggar Nadi along with the officers of the Board and District Administration. During visit, it was observed that at the outlet of CETP in Buddha Nallah, effluent was coming at comparable slow pace with lesser quantum than the normal discharge with having blackish colour. The team then visited the CETP 40 MLD and observed that the decanting near the outlet of CETP was not in process. The sample of effluent collected from the tank after Chlorine contact tank collected during visit was also of blackish colour and was leading to the final outlet into Buddha Nallah. The physical condition of the current samples, previous analysis results reveals that the CETP is not working effectively and efficiently. Moreover, the physical condition of the chlorine contact tank shows considerable quantity of solids are settled in it. On enquiry, the representative of the CETP stated that the cleaning of clarifier will resolve the issue and it is also scheduled shortly and 2 no. of SBR tanks are already under maintenance.

8) It is pertinent to mention here that monthly effluent samples were collected by the Board from the month of January, 2022 to May, 2023 and as per analysis reports, the concentration of various parameters of the outlet stream were beyond the prescribed limits of MoEF&CC as well as stringent standards prescribed by the Board.

9) Considering the violations, the SPV was issued notice u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988 and for imposition of Environmental Compensation by the Board with an opportunity of personal hearing before Chairman of the Board on 12.06.2023, wherein after hearing the representatives of the industry and the PPCB officers it was decided that Interim EC of Rs. 75 Lacs be imposed on the SPV.

10) And whereas due to continued violations w.r.t. non achievement of standards and violation of the EC conditions the SPV was issued notice u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988 and for imposition of Environmental

Compensation by the Board with an opportunity of personal hearing before Chairman of the Board on 18.09.2023, wherein after considering the reply submitted by the SPV and hearing the PPCB officers it was decided that to calculate the Environmental Compensation since the start of CETP considering continued violations being committed by the SPV by way of discharging its effluent into Budha Nallah in violation of the condition of Environmental Clearance granted by the Ministry of Environment, Forest and climate change by adjusting the period/amount of the EC already imposed by the Board and deposited by the SPV.

11) That it is relevant to mention here that the Hon'ble Supreme Court of India has considered the concept of Polluter Pay's Principle in Indian Council for Enviro Legal Action and others v/s Union of India and others (1996) 3 SCC 212 para 16, Vellore Citizens Welfare Forum v/s Union of India (1996) 5 SCC 647 para 12-18 and held that Polluter Pay's Principle is accepted principle and part of environmental law of the country without even specific statute.

12) And whereas, the CETP was directed vide Board's letter no. 80 dated 17.03.2025, to deposit an amount of Rs. 2,21,70,000/- (Rs. 2,96,70,000 - Rs. 75,00,000) as Environmental compensation for the period of violation from 04.01.2022 to 18.09.2024 in the Board within 15 days.

13) That as per monitoring conducted by CPCB in the month of December 2024, at the inlet of CETP, TDS parameter was observed to be 4532 mg/l which is much beyond the design parameter (1900 mg/l) as mentioned by the SPV at the time of submission of DPR for obtaining grant in aid by the Central and State Government. Similar trend was observed in the earlier monitoring carried out by the Board and other agencies. Certain instances have come to light in which various member units of PDA have been found discharging untreated effluents in MC sewer lines bypassing the dedicated conveyance systems.

14) That, the matter was considered by the Competent Authority and the SPV was issued notice to issue directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974, show cause notice for non-submission of Environmental Compensation imposed on the SPV alongwith notice for imposition of Environmental Compensation with hearing before Chairman of the Board on 06.05.2025, wherein it was decided that Environmental Compensation shall be imposed on the SPV for non-compliance of environmental norms for a further period from 19.09.2024 to 06.05.2025.

15) Thus, in view of the above recorded facts, the matter was considered for imposition of Environmental Compensation for the period of violation from 19.09.2024 to 06.05.2025 in accordance with the formula and methodology evolved by the Central Pollution Control Board and adopted by the Punjab Pollution Control Board. The amount of Environmental

Compensation for the period of violation from 19.09.2024 to 06.05.2025 (230 days) was calculated to be Rs. 69,00,000/- as per following details:

EC	=	PI x N x R x S x LF
PI	=	Violation under Water Act, 1974 by red category unit = 32
N	=	Number of days = 19.09.2024 to 06.05.2025 (230 days)
R	=	A factor in Rupees = 500 (Large Scale red category project)
S	=	Large Scale project = 1.5
LF	=	Municipal Corporation i.e. Ludhiana having population between one million to five million = 1.25
EC	=	32 x 230 x 500 x 1.5 x 1.25 = Rs. 69,00,000/- (Rs. Sixty Nine Lacs only)

16) And Whereas the SPV of 40 MLD CETP is hereby directed to deposit an amount of Rs. 69,00,000/- (Rs. Sixty Nine Lacs only) as Environmental compensation for the period of violation from 19.09.2024 to 06.05.2025 (230 days) with the office of the Punjab Pollution Control Board within 15 days, from the date of receipt of this order, failing which, the Board shall be constrained to initiate necessary action for recovery of the amount of Environmental Compensation by adopting coercive measures, thereafter.

17) Take notice that no further intimation or reminder will be issued by the Board in this regard. Environmental Engineer, Punjab Pollution Control Board, Regional Office-1, Ludhiana is directed to ensure compliance of directions issued in the case. A copy of this order be supplied to all the concerned for compliance.


(Reena Gupta)
Chairperson

**PUNJAB POLLUTION CONTROL BOARD**

Zonal Office-1, E-648-B, Phase-V, Focal Point, Ludhiana

Tele Fax:-0161-4673789

Website:- www.ppcb.gov.inemail:- ppcbzo1ldh@gmail.com

No. 4466-67

Date 9/9/25

To

The Deputy Commissioner,
Ludhiana

Subject:

Recovery of Environmental Compensation Imposed on Punjab Dyers Association, Tajpur Road, Ludhiana (CETP 40 MLD) for the violations of the provisions of Water Act, 1974 with respect to 40 MLD CETP established for Focal Point Dyeing Cluster, Ludhiana (Correspondence Address: Mr. Harvinder Singh (JS) 341/342-D, Phase VIII, Focal Point, Ludhiana - 141010).

The Punjab Dyeing Association (PDA) Ludhiana, a Special Purpose Vehicle (SPV) is responsible for the establishment, up-gradation, operation and maintenance of 40 MLD CETP for treatment of waste water from the cluster of textiles dyeing industries located at Focal Point, Ludhiana and adjoining areas.

- 2) The SPV was granted Environmental Clearance by the Ministry of Environment, Forest and Climate Change (MoEF&CC) vide letter no. F.No.10-92/2010-IA.III dated 03.05.2013 for establishment of Common Effluent Treatment Plant for treatment of trade effluent of cluster of dyeing units of Ludhiana with certain conditions as mentioned therein.
- 3) The Ministry of Environment, Forest and Climate Change (MoEF&CC) released Grant-in-Aid to the SPV for Special Purpose Vehicle (SPV) for setting up of 40 MLD CETP at Focal Point, Ludhiana. The said grant was released based on the Detailed Project Report (DPR) submitted by the SPV, which was based on achieving stringent environmental standards.
- 4) The Punjab Pollution Control Board is monitoring the CETP since the date of its inception. This CETP is also monitored by Centre Pollution Control Board, New Delhi. A third party monitoring was also got conducted.
- 5) The Central Pollution Control Board (CPCB) carried out the inspection of Common effluent treatment plant (CETP- 40 MLD) located in Ludhiana during April 2024 and December 2024 and found the CETP non-complying with the environmental norms and Environmental Clearance conditions.
- 6) The CETP is not achieving the standards as mandated by the MoEF&CC, Govt. of India for discharge of effluent in surface water bodies. The CETP as well as is not achieving the design parameters and stringent standards proposed in the DPR submitted at the time of appraising their project for financial assistance by the MoEF&CC, Government of India, for utilizing treated effluent on to land for irrigation. The CETP is not complying with the Environmental Clearance conditions granted to it.
- 7) The Punjab Pollution Control Board has issued number of notices along with opportunities of personal hearings to the SPV from time to time due to the various non-compliances including non-achievement of standards and comply with the conditions of environmental clearance. The SPV had been directed by the Board to achieve the prescribed standards from time to time.

8) That due to the violations observed from time to time, the SPV was imposed environmental compensation amounting to Rs. 2,21,70,000/- for the violations period from 04.01.2022 to 18.09.2024. The Board has directed the SPV of the CETP vide Board's letter no. 80 dated 17.03.2025, to deposit an amount of Rs. 2,21,70,000/- as Environmental compensation, within 15 days. A copy of EC orders is also enclosed herewith. The SPV failed to deposit the environmental compensation.

9) The SPV was issued notice u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 for non-submission of Environmental Compensation with an opportunity of personal hearing before Chairman of the Board on 06.05.2025, wherein along with other directions it was also directed to the SPV that it will deposit the environmental compensation of Rs. 2,21,70,000 /- earlier imposed by the Board and already conveyed to the SPV, within 15 days. But, the SPV failed to deposit the environmental compensation.

10) The SPV recently was again issued notice u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 with an opportunity of personal hearing before the Worthy Chairperson of the Board on 10.07.2025, wherein it was decided that the SPV shall deposit the environmental compensation of Rs. 2,21,70,000 /- earlier imposed by the Board and already conveyed to the SPV, within 15 days, failing which the matter shall be referred to the Revenue Authorities for recovery of the same. However, the SPV has failed to deposit the environmental compensation.

11) The SPV also filed an appeal before Hon'ble NGT against the directions issued by the Board to stop discharge of 40 MLD CETP into Buddha Nallah or any other surface water body and against the Environmental Compensation imposed by the Board. However, Hon'ble NGT has not given stay on Environmental Compensation rather Hon'ble NGT in its last hearing in the case on 22.07.2025 has directed to place on record the full details relating to the calculation of environmental compensation and status of its recovery. A copy of order Hon'ble NGT dated 22.07.2025 is also enclosed herewith for kind perusal.

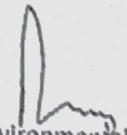
12) The SPV till date has failed to deposit the Environmental Compensation of Rs. 2,21,70,000/- despite of continuous efforts made by the Board, as detailed above.

In view of above, it is requested to direct the concerned Revenue Authority to recover the Environmental Compensation of 2,21,70,000/- from M/s Punjab Dyers Association (Focal Point Module), Ludhiana in accordance with law of Punjab Land Revenue Act or any other Act for the time being in force, please

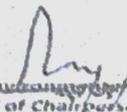
This issues with the approval of the Chairperson of the Board.

DA/As above

Endst. No.....


Senior Environmental Engineer
For & on behalf of Chairperson, PPCB
Dated.....

A copy of the above is forwarded to the Secretary to Govt. of Punjab, Department of Science, Technology and Environment, for kind information please.


Senior Environmental Engineer
For & on behalf of Chairperson, PPCB

Imposition of Environmental Compensation and status of its recovery: 15 MLD CETP, Bahadur ke Road, Ludhiana

Date of commissioning of CETP	Total Period for which EC has been Imposed	Detail of Orders vide which EC was imposed	Total Amount of EC imposed (in Rs.)	Amount of EC Recovered (in Rs.)
August, 2020	07.08.2020 to 06.05.2025	i. Order no. 335 dated 04.10.2022 for Rs. 77,62,500/- ii. Order no. 03 dated 08.01.2025 for Rs. 3,73,57,500/- iii. Order dated 421 dated 18.09.2025 for Rs. 69,00,000/-	5,20,20,000/-	Rs. 77,62,500/- has been recovered with the encashment of a bank guarantee lying with the Board.

Note:

1. The Environmental Compensation imposed by the Board has been calculated in accordance with the formula and methodology evolved by the Central Pollution Control Board.
2. The Punjab Dyers Association, Tajpur Road, Ludhiana has been requested in the hearings held on 06.05.2025 and 10.07.2025 to deposit the amount of Environmental Compensation with the Board.
3. Letter no. 5255 dated 08.09.2025 has been written to Deputy Commissioner Ludhiana for effecting the recovery of the amount of Environmental Compensation as arrears of Land revenue.
4. The Punjab Dyers Association has filed appeal no. 20 of 2025 before The Hon'ble National Green Tribunal against the orders passed by the Punjab Pollution Control Board of imposition of Environmental Compensation.
5. The orders mentioned above are collectively been enclosed as **Annexure-F**.



Punjab Pollution Control Board

Vatavaran Bhawan, Nabha Road, Patiala

Phone no.2215793

No. 21712Dated: 14/10/2022

To

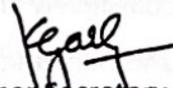
M/s Bahadur Ke Textile & Knitwear Association (BKTKA),
15 MLD CETP,
Bahadurke Road, Ludhiana.

Subject: Imposition of Environmental Compensation for violation of the provisions of Environmental Laws.

Please refer to the subject cited above.

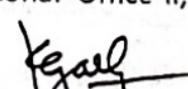
2) The Competent Authority of the Board after consideration of the matter has imposed Environmental Compensation amounting to Rs.77,62,500/- upon M/s Bahadur Ke Textile & Knitwear Association (BKTKA), 15 MLD CETP, Bahadurke Road, Ludhiana, for violation of environmental norms for the period from 25.9.2021 to 19.4.2022.

3) Please find enclosed herewith a copy of order no. 335 dated 4.10.2022 for compliance. You are requested to deposit the amount of Environmental Compensation with the office of the Board within 15 days from the date of receipt of the copy of order.

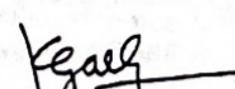
Endst. no. 21713-14Date 14/10/2022
o/c Member Secretary

A copy of the above alongwith order bearing no. 335 dated 4.10.2022 issued for imposition of Environmental Compensation upon M/s Bahadur Ke Textile & Knitwear Association (BKTKA), 15 MLD CETP, Bahadurke Road, Ludhiana is forwarded to the following for information and necessary action please.

1. The Chief Environmental Engineer, Punjab Pollution Control Board, Ludhiana.
2. The Senior Environmental Engineer, Punjab Pollution Control Board, Zonal Office-II, Ludhiana.

Endst. no. 21715Date 14/10/2022
o/c Member Secretary

A copy of the above alongwith order bearing no. 335 dated 4.10.2022 issued for imposition of Environmental Compensation upon M/s Bahadur Ke Textile & Knitwear Association (BKTKA), 15 MLD CETP, Bahadurke Road, Ludhiana is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-III, Ludhiana with a direction to ensure compliance of the order.


o/c Member Secretary



Dated. 04/10/2022

No. 335.....

Subject: Imposition of Environmental Compensation upon M/s Bahadur Ke Textile & Knitwear Association (BKTKA), 15 MLD CETP, Bahadurke Road, Ludhiana for violation of the provisions of Environmental Laws.

Order

In order to protect and improve the environment and for prevention of hazards to human beings, other living creatures, plants and property and maintaining or resorting the wholesomeness of water and to preserve the quality of air, the Parliament of India had enacted the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 and certain rules under the provisions of the Environment (Protection) Act, 1986 and all these laws are collectively and severally referred to as the Environmental Laws. For achieving the objectives and implementing of the provisions of the Environmental Laws aforementioned, the State Pollution Control Boards have been constituted in all the States of the Country including the State of Punjab.

2) The Ministry of Environment, Forest & Climate Change (MoEF&CC), Government of India has declared various clusters in the Country as Critically Polluted Areas (CPA), Severely Polluted Area (SPA) based on Cumulative Environmental Pollution Index (CEPI) score. Due to increased industrialization, activities of the Industrial units and some other identical reasons, Ludhiana city has been declared as Critically Polluted Area by the Central Pollution Control Board.

3) The SPV, namely Bahadurke Textile & Knitwear Association (BKTKA) has set up a Common Effluent Treatment Plant (CETP) of capacity 15 MLD at Bahadurke Road, Ludhiana for treatment of industrial effluent of textile and dyeing industries situated at Bahadurke Road, Dyeing Complex after availing the financial assistance and subsidy from the Central and the State Government. The Common Effluent Treatment Plant based on SBR Technology was commissioned in the month of July, 2020. The Punjab Pollution Control Board has granted

-1-

Adush

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consent to operate to the Common Effluent Treatment Plant under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, (valid upto 04.01.2023) and the Air (Prevention & Control of Pollution) Act, 1981, (valid upto 31.03.2023). Similarly, authorization under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 was granted (valid upto 04.10.2022) with certain conditions as mentioned therein.

4) The Punjab Pollution Control Board being regulatory authority has facilitated the installation and commissioning of 15 MLD CETP by M/s Bahadurke Textile & Knitwear Association (BKTKA), in view of the fact that the commissioning of the Common Effluent Treatment Plant will ultimately help in preventing, controlling and eradicating the pollution of water in Budha Nallah and River Sutlej. Since the inception of the 15 MLD CETP, the Board is pursuing M/s Bahadurke Textile & Knitwear Association (BKTKA) to comply with the provisions of various Environmental Laws. The officers of the Board are visiting and inspecting the CETP from time to time in order to ensure the compliance of Law. Apart from inspections, the Board has also issued notices and extended the opportunities of hearing to M/s Bahadurke Textile & Knitwear Association (BKTKA), to ensure the compliance of the provisions of Law in the operation of Common Effluent Treatment Plant of 15 MLD capacity.

5) M/s Bahadurke Textile & Knitwear Association (BKTKA) has applied for the renewal of consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 on 3.3.2021. However, in view of the fact that the analysis reports of the effluent samples collected from the CETP on monthly basis with effect from January, 2020 to January, 2021 and for the months of February and March 2021 were found to be beyond the permissible limits and also in view of the fact that the SPV had discharged the effluent into Budha Nallah on 29.3.2021, 30.3.2021 and 31.3.2021 and had not shut down the operation of CETP in-spite of repair work, a show cause notice for refusal of consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 and to show cause as to why environmental Compensation may not be imposed for continuous failure of samples was issued to the Chairman and Director of M/s Bahadurke Textile & Knitwear Association (BKTKA) vide letter no. 3863-3864 dated 13.5.2021 with an opportunity of hearing through video conference before the Chairman of the Board for 25.5.2021.



6) The personal hearing was held on 26.8.2021. Sh. Lalit Jain, Chairman, Sh. Rajnesh Gupta, Director and Sh. Shibu Mathews consultant appeared before the Chairman of the Board on behalf of the M/s Bahadurke Textile & Knitwear Association (BKTKA). The relevant facts are mentioned herein below:

- a) The representatives submitted a written reply mentioning therein certain facts relating to the operation of 15 MLD CETP and stated that they have collaborated with M/s Austro Water Technologies Pvt. Ltd. Tamil Nadu for technical assistance to achieve stringent Punjab Pollution Control Board parameters as well as to reduce sludge generation. The chemical trail requires 30 days for final results to be achieved. The representatives requested to consider their efforts for a progressive approach towards smooth operation and maintenance of 15 MLD CETP and pleaded for grant of consent to operate.
- b) After considering the relevant aspects of the case, the Competent Authority has decided that:
 - i. Short term consent be extended to the SPV for six months with the main condition that it shall complete the upgradation / improvement in the CETP within one month so as to achieve the effluent standards as per Detailed Project Report (DPR).
 - ii. The SPV shall carry out study in two of its units as demo for reduction in the TDS parameter at the outlet of CETP, so that the same may be replicated in the other units and the study should be completed, within one month.
 - iii. Environmental Engineer, Ludhiana shall visit the SPV immediately after one month and carryout sampling component wise and send the report/recommendations, thereafter.
- c) The proceedings of the hearing held on 26.8.2021 were conveyed to the Chairman and Director of SPV, M/s Bahadur e Textile & Knitwear Association (BKTKA) for compliance vide letter no. 6555-56 dated 22.9.2021.



- d) In compliance to the decisions of the hearing, the consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 was granted to the SPV on 18.10.2021 valid upto 31.3.2022.
- e) In compliance to the decision of hearing held on 26.8.2021, the CETP was visited by officers of the Board on 26.10.2021 and component-wise sampling was carried out. As per the analysis report, various parameters namely TDS = 4183 mg/l, BOD = 30 mg/l, Sulphide = 2.4 mg/l, Phenolic Compound = 2.2 mg/l, SAR = 38.4 mg/l and Bio-assay = 70% survival of fish in 100% effluent after 96 hrs were observed to be beyond the stringent standards at the outlet of CETP.
- 7) In view of the fact that the CETP is continuously not achieving the discharge standards prescribed by the Board at the final outlet of the CETP since its inspection and also for the months of July, August and September, 2021 and also not achieving the inlet designed parameters as per the DPR, a show cause notice for revocation of consent to operate granted under the Water (Prevention & Control of Pollution) Act, 1974 and for imposition of Environmental Compensation was issued to the SPV vide letter no.559 dated 24.1.2022 with an opportunity of personal hearing before the Chairman of the Board for 7.2.2022 through hybrid mode.
- 8) Sh. Lalit Jain, Chairman, Sh. Rajneesh Gupta and Sh. Subhash Saini, both Directors alongwith Sh. S.S. Matharu, consultant of SPV attended the hearing on 7.2.2022 and submitted written reply. The relevant facts are mentioned herein below:
- a) The representatives brought out some technical aspects of the 15 MLD CETP and stated that they have taken up the matter with Dr. Harvinder Singh Saini, Professor and Head, Deptt. of Microbiology to carry out microbiological studies of the wastewater. The study is under way to find out the suitable microbial consortia as per available temperature of the effluents for further reduction in the values of the BOD & COD and to optimize the treatment efficiency of CETP.
- b) After hearing the members of the SPV and officers of the Board, the Competent Authority has taken certain decisions for compliance by the CETP and also decided that another opportunity of personal hearing be given to SPV in the 2nd week of



March, 2022 with regard to violations observed under the provisions of Water (Prevention & Control of Pollution) Act, 1974.

- c) The proceedings of the hearing held on 7.2.2022 were conveyed to the Chairman and Director of M/s Bahadurke Textile & Knitwear Association (BKTKA) vide letter no. 1621-1622 dated 15.3.2022 for compliance.
- d) The matter was considered by the Competent Authority of the board and the SPV was given another opportunity of personal hearing for 19.04.2022.

9) Before the actual date of hearing on 19.4.2022, the CETP was visited by the officers of the Board on 11.4.2022. Observations of the visiting officers and other details noticed during the visit are mentioned herein below:

A) Observations of visiting officers

- a) The effluent was being discharged into the Buddha Nallah through the pipeline containing the treated effluent of the CETP 15 MLD.
- b) The effluent samples were collected from the pipeline leading to Buddha Nallah. The effluent from the pipeline was stopped immediately after the collection of effluent samples at that point. The colour of the sample was dark grey.
- c) No proper sampling arrangement has been made by the SPV at the final outlet leading to the Budha Nallah in-spite of the several requests made to the SPV to arrange the same.
- d) The CETP was in operation but no decanting was going on at site. The aeration in the SBR basins was going on and the effluent from the member industries was also coming at the inlet/Main Pumping Station of the CETP.
- e) The effluent samples were collected from the equalization tank of CETP and sent to M/s Sophisticated Analytical Instrument Laboratories, Thapar Technology Campus, Bhadson Road, Patiala for analysis.

B) Violations noticed

- a) The SPV has not submitted the compliance of the decisions taken during the hearing on 26.08.2021 with regard to carry out study in two of its units as demo for the reduction of its TDS parameter at the final outlet of CETP.

Adarsh



- b) SPV has not provided any proper sampling arrangement at the outlet situated inside the premises as well as at final outlet of the CETP before it's outfall into the Budha Nallah till date and also not installed OCEMS at that point.
- c) The SPV has not connected the flow meter installed at the inlet of the CETP with the online Supervisory Control and Data Acquisition (SCADA) system till date.
- d) The SPV has constructed a separate flash mixture for the chemical dosing in addition to the existing flash mixture but the same has not been made operational till date.
- e) The CETP is not achieving the effluent standards as per the inlet design parameters of the CETP as per the DPR.

10) The hearing conducted on 19.4.2022 was attended by Sh. Lalit Jain, Chairman, Sh. Rajneesh Gupta and Sh. Atul Malhotra both directors alongwith Sh. S.S. Matharu, consultant of SPV and submitted written reply. By referring to different technical aspects of the case, the representatives again sought time from the Board for carrying out improvement and upgradation of the CETP. The details thereof are given below:

- a) The representatives informed that an order has been placed with M/s. Krofta Engineering Works, New Delhi for installation of Diffused Air Flotation (DAF), which will remove the 80-90% of TSS, fibre and oil/grease from the trade effluent, thereby reducing organic load on the downstream components of the CETP. Installation and commissioning work of the DAF will be completed by 30.06.2022.
- b) After the installation of DAF, a study to be completed within 3 months will be conducted by the Thapar University/GNDU. The recommendations of the study will be considered for further improvement.
- c) An order for stream paddle drier has been placed with M/s Vapco Engineers Pvt. Ltd. for handling of sludge. The same will be installed and commissioned by 30.06.2022.
- d) SPV is in the process of commissioning the reaction tank for coagulation.
- e) Environmental Engineer, Ludhiana informed that the analysis results of the samples collected during the visit on 11.4.2022 were found to be beyond the permissible limits laid down by the Board.



- f) The SPV has installed OCEMS at the final outlet, but the probes of the same were found placed in a drum filled with effluent instead of collection tank of the treated effluent.
- g) After hearing the representatives of the SPV M/s BKTKA and the officers of the Board and also considering the relevant facts, it was observed by the Competent Authority that the SPV has also been extended opportunities of hearing earlier and also on 26.8.2021 and sufficient time was given to the SPV to carry out the study in its units as demo for reducing in the TDS parameter and upgradation/ improvement in its CETP, so as to achieve the effluent standards prescribed by Punjab Pollution Control Board, but the SPV has failed to conduct the said study till date. No upgradation has been carried out by the SPV and the CETP is also not achieving the standards prescribed by the Board.
- h) The Competent Authority of the Board has accordingly taken certain decisions during the hearing on 19.4.2022 to ensure that the SPV will remove the violations and upgrade the CETP by 30.6.2022 positively as per its undertaking given in the reply.
- i) It was further decided to impose an Environmental Compensation (EC) for the period from 25.09.2021 to 19.04.2022 for non-compliance and Environmental Engineer, Regional Office-3, Ludhiana was asked to calculate Environmental Compensation (EC) and submit details thereof.
- j) The proceedings of hearing held on 19.4.2022 were conveyed to the Chairman and Director of M/s Bahadurke Textile & Knitwear Association (BKTKA) by the Board vide letter no. 3484-85 dated 27.5.2022 for compliance of decisions mentioned therein.
- 11) It is pertinent to mention here that the Hon'ble Supreme Court of India has considered the concept of Polluter Pay's Principle in Indian Council for Enviro Legal Action and Others v/s Union of India and Others (1996) 3SCC 212, Vellore Citizens Welfare Forum v/s Union of India (1996) 5 SCC 647 and held that Polluter Pay's Principle is accepted principle and part of environmental law of the country even without specific statute.
- 12) To apply the Polluter Pay's Principle it is be ascertained as to in what manner the pollution has been caused. The Common Effluent Treatment Plant installed and



commissioned by M/s Bahadurke Textile & Knitwear Association (BKTKA) is treating the effluent of the member industries situated at Bahadurke Road, Dyeing Complex, Ludhiana. Since the inception and commissioning of the Common Effluent Treatment Plant in the month of July, 2020, the CETP is not achieving the standards prescribed by the Board and is violating the provisions of the Water (Prevention & Control of Pollution) Act, 1974. Sufficient time has been given to the SPV to upgrade and improve the functioning of the Common Effluent Treatment Plant, but the SPV has not bothered to carry out the upgradation of the CETP. The officers of the Board are carrying out the sampling of the CETP on monthly basis since July, 2020, but the analysis results are showing the parameters of pollutants beyond the limits prescribed by the Board. The sole purpose of the member industries and SPV M/s Bahadurke Textile & Knitwear Association (BKTKA) seems to earn money and profit without caring for the protection and preservation of environment. The CETP is discharging the treated trade effluent into Budha Nallah, which leads to River Sutlej, but the discharge of treated effluent is not meeting with the standards prescribed by the Board and thus the effluent so discharged is polluting the Water of Budha Nallah as well as River Sutlej, which is also used by the people for bathing and drinking purpose and thus the activities being carried out by the SPV M/s Bahadurke Textile & Knitwear Association (BKTKA) in violation of the directions of the Board and provisions of Law intentionally and deliberately in the critically polluted area of Ludhiana city are damaging the environment and polluting the river water. These facts are sufficient for the imposition of Environmental Compensation and the SPV has thus made itself liable for Environmental Compensation under the Polluter Pay's Principle for the period of violation from 25.9.2021 to 19.4.2022.

13) Thus, in view of the above recorded facts, the matter was considered for imposition of Environmental Compensation for the period of violation from 25.9.2021 to 19.4.2022 in accordance with the formula and methodology evolved by the Central Pollution Control Board and the amount of Environmental Compensation for the period of 207 days from 25.9.2021 to 19.4.2022 was calculated and worked out to be Rs. 77,62,500/- as per the following details:



EC	=	$PI \times N \times R \times S \times LF$
PI	=	Pollution Index = 80 (score having water pollution / Air pollution / Hazardous Waste generation)
N	=	Number of days = 207 (25.9.2021 to 19.4.2022)
R	=	A factor in Rupees = 250
S	=	Factor based on scale of the industry = 1.5
LF	=	Population Factor = 1.25
EC	=	$80 \times 207 \times 250 \times 1.5 \times 1.25 = \text{Rs. } 77,62,500/-$ (Rs. Seventy Seven lakh sixty two thousand five hundred only)

14) Therefore, M/s Bahadurke Textile & Knitwear Association (BKTKA), 15 MLD CETP is hereby directed to deposit an amount of Rs. 77,62,500/- (Rs. Seventy-seven lakh sixty-two thousand, five hundred only) as Environmental compensation with the office of the Punjab Pollution Control Board within 15 days, from the date of receipt of this order, failing which, the Board will be constrained to initiate necessary action for recovery of the amount of Environmental Compensation by adopting coercive measures.

15) Take notice that no further intimation or reminder will be issued by the Board in this regard. Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana is directed to ensure compliance of directions issued in the case. A copy of this order be supplied to all the concerned for compliance.

Adarsh Pal Vig
(Dr. Adarsh Pal Vig)
Chairman



ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਰੋਕਥਾਮ ਬੋਰਡ
PUNJAB POLLUTION CONTROL BOARD



Misc. No. 5238

Zonal Office-II, E-648-B, Back Side CICU Office, Phase-5, Focal Point, Ludhiana
E-mail: seezo2ldhppcb@yahoo.com

Ph No. 0161-2670141

No. PPCB/SEE/ZO-2/LDH/2025/.....

Registered

Dated

To

The Chairman,
Bahadur Ke Textile & Knitwear Association (SPV),
C/o M/s Adinath Dyeing & Finishing Mills,
Bahadurke Road, Dyeing Complex, Ludhiana.

2
ਸ਼ਾਨਮਯੋਗ ਸਹਾਇਕ ਕਲਰਕ/ਫਿਨਿਸ਼ਿੰਗ ਵਾਤਾ ਵਿੱਚ
ਨਵੀਂ ਡਾਕ ਜੂ. ਵਾਤਾ ਵਿੱਚ
ਵਾਤਾ ਵਿੱਚ
ਡਾਇਰੀ ਨੰ. 98... ਮਿਤੀ 15/1/25
15/1/25

Subject: Imposition of Environmental Compensation upon CETP of 15 MLD capacity installed at Bahadurke Road, Ludhiana for violation of the provisions of Environmental Laws- order thereof.

Please find enclosed order no. 03 dated 08.01.2025 passed by the Competent Authority of the Punjab Pollution Control Board, whereby, the Environmental Compensation amounting to Rs. 3,73,57,500/- (Rs. Three Crore Seventy Three Lacs Fifty Seven Thousand five hundred only) has been imposed upon the Special Purpose Vehicle (SPV) i.e. Punjab Dyers Association (15 MLD CETP). It is requested to deposit the Environmental Compensation, within 15 days, from the date of receipt of this order.

DA/as above

Sd/L
Environmental Engineer

Endst. No. 149.....

Dated 10/01/25

A copy of the above alongwith order no. 03 dated 08.01.2025 is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana for information and necessary action. He is requested to get the copy of the above said order received by the project proponent.

DA/as above

Kishu
10.01.25
Environmental Engineer



ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਕੰਟਰੋਲ ਬੋਰਡ

PUNJAB POLLUTION CONTROL BOARD

ਗੰਨੇਅਰ ਸਹਾ/ਸਸ ਕਲਰਕ/ਡੀ.ਈ.ਓ/ਸਹਾ ਵਾਤਾ ਵਿੱਚ

ਨਵੀ ਡਾਕ ਜ਼. ਵਾਤਾ ਵਿੱਚ

Dated. 08/11/25

No. 03

ਵਾਤਾ ਵਿੱਚ

ਵਾਇਰੀ ਨ. ਵਿ. ਡੀ.

Subject: Imposition of Environmental Compensation upon CETP of 15 MLD capacity installed at Bahadurke Road, Ludhiana for violation of the provisions of Environmental Laws.

Order

Whereas, the Punjab Pollution Control Board being the statutory regulatory authority is implementing the provisions of the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 and the rules made three under in the State of Punjab. The main objective of the Board is maintaining or restoring the wholesomeness of water, the preservation of the quality of air and the protection and improvement of the environment.

2) And whereas, the Ministry of Environment, Forest & Climate Change (MoEF&CC), Government of India has declared various clusters in the Country as Critically Polluted Areas (CPA), Severely Polluted Area (SPA) based on Cumulative Environmental Pollution Index (CEPI) score. Due to increased industrialization, activities of the Industrial units and some other identical reasons, Ludhiana city has been declared as Critically Polluted Area by the Central Pollution Control Board.

3) And whereas, the Bahadur Ke Textile & Knitwear Association (BKTKA) has setup a Common Effluent Treatment Plant (CETP) of capacity 15 MLD for treatment of waste water from the cluster of textiles dyeing industries located at Bahadurke Road, Ludhiana.

4) And whereas, the SPV was granted Environmental Clearance by the Ministry of Environment, Forest and Climate Change vide letter no. F.No.10-119/2011-IA.III dated 08.12.2014 for establishment of Common Effluent Treatment Plant of capacity 15 MLD for treatment of trade effluent of cluster of dyeing industries of Bahadurke Road, Ludhiana subject to the specific condition that "the project proponent shall maintain Zero Liquid Discharge (ZLD).

5) And whereas, in a follow-up meeting dated 03.03.2016 of the Appraisal Committee on CETPs, proposal of CETP from BKTKA to initiate the CETP on conventional treatment system in Phase-I was approved and it was decided that project proponent may adopt ZLD in the Phase-II for which they will apply to the MoEF&CC at a later stage as an up-gradation case.



- 6) And whereas, based on above the SPV was granted Consent to Operate (CTO) was granted Consent to Operate (CTO) vide no. CTOW/ Varied/ LDH3/ 2020/ 11846013 dated 10.09.2020 having validity upto 31.03.2021 for 1st phase of conventional treatment.
- 7) As such, the SPV was bound to upgrade the CETP based on ZLD Technology and to achieve the stringent parameters as mentioned in the DPR submitted to the MoEF&CC, Govt. of India, while obtaining grant-in-aid as well the standards for textile industries and CETPs as notified by the MoEF&CC, Govt. of India on 01.01.2016.
- 8) And whereas, the SPV is violating the provisions of Water (Prevention and Control of Pollution) Act, 1974 since its inception on 25.09.2021, by way of not upgrading the CETP to ZLD Technology and by not achieving the standards as per the DPR submitted by it while obtaining grant-in-aid as well as the standards for textile industries and CETPs as notified by the MoEF&CC, Govt. of India on 01.01.2016.
- 9) And whereas, the SPV has been continuously persuaded by the Board for upgrading the CETP by adopting ZLD technology and to achieve the prescribed standards. Accordingly, the SPV has been afforded personal hearing before the Chairman of the Board many times, i.e. on 11.09.2020, 26.08.2021, 27.02.2022, 19.04.2022, 16.06.2023 and on 09.08.2024, but the SPV has failed to submit any proposal for upgrading the CETP to ZLD technology and also has failed to achieve the standards as per the DPR submitted by it to the MoEF&CC and the standards as prescribed by the MoEF&CC vide notification dated 01.01.2016.
- 10) And whereas, on account of various violations of the provisions of Water (Prevention and Control of Pollution) Act, 1974, Environmental Compensation of Rs. 77,62,500/- vide order no. 335 dated 04.10.2022 for the period of 25.09.2021 to 19.04.2022, which was got en-cashed from bank guarantee of Rs. 2,40,00,000/- already submitted by the SPV with the Board.
- 11) And whereas, in compliance of directions of the Central Monitoring Committee (CMC), CPCB carried out inspection and monitoring of CETP of 15 MLD capacity on 22.04.2024 and following observations were made:
1. During the visit on 22.04.2024, the CETP was found operational with the flow rate of 11.26 MLD. The CETP receives effluent through dedicated underground pipeline and the treatment is based on Sequential Batch Reactor (SBR) technology. It was informed that the CETP is discharging the treated effluent into Buddha Nallah (which meets River Sutlej) through underground pipeline from the CETP. However, as per EC issued by MoEF&CC on 08.12.2014, the CETP is required to establish a Zero Liquid Discharge system.
 2. The consent under the Air Act, 1981 is valid upto 31.03.2025 for the operation of 15 MLD CETP. However, the consent under the Water Act, 1974 was valid till 04.01.2023 and the



Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 was valid till 04.10.2022 for which the CETP has applied for renewal to PPCB.

3. During visit, it was informed to the team that 36 Dyeing/Printing/washing units had obtained membership from CETP and connected to the CETP.
 4. Grab samples were collected from the CETP during monitoring. The analysis results of sample collected from CETP outlet reveals that BOD: 243 mg/l (Standard: 30 mg/l), COD: 587 mg/l (Standard: 250 mg/l), Chloride: 1904 mg/l (Standard: 1000 mg/l) and Sulphide: 16 mg/l (Standard: 2 mg/l) exceeds the notified effluent discharge standards for CETP. Remaining monitored parameters were found within the prescribed standards.
 5. Further, the grab samples were collected from the Sequential Batch Reactor (SBR) tank for MLSS & MLVSS. The sample analysis results reveals that the concentration of MLSS: 2639 mg/l (Designed value: 4840 mg/l) and concentration MLVSS: 1179 mg/l (Designed value: 3872 mg/l) are less than the designed values, which indicates the poor operation of the SBR.
 6. The CETP has installed Online Continuous Effluent Monitoring System (OCEMS) at the final outlet of treated effluent for the parameters pH, TSS, COD, BOD with connectivity to PPCB & CPCB servers. During the visit, the OCEMS was found operational and variation in OCEMS reading compared with the monitored results was also reported which indicates the improper working / validation / calibration of OCEMS system.
 7. During the visit, it was observed that the CETP has provided sludge storage facility and obtained membership from M/s Re-sustainability Limited (M/s Ramky Enviro Engineers Limited) for disposal of sludge. The CETP had disposed 602.685 MT Sludge during the period of 02.04.2023 to 31.03.2024, through TSDF.
- 12) And whereas, the SPV was violating the provisions of the Water (Prevention & Control of Pollution) Act, 1974.
- 13) And whereas, in light of deficiencies as observed by CPCB team of officers in operation of the CETPs of Ludhiana installed for dyeing units during its visit on 22.04.2024, the Central Pollution Control Board issued directions u/s 18/1(b) of the Water (Prevention & Control of Pollution) Act, 1974 to the Punjab Pollution Control Board vide letter no. CPCB/IPC-VII/CETP-Ludhiana/3471 dated 12.08.2024 to take appropriate action in the matter including imposition of Environmental Compensation and to ensure that the CETP is operated ensuring:
- a) Operation/ augmentation of the treatment system, appropriately, so as to meet the prescribed discharge standards and to comply with the disposal condition mentioned in the Environmental Clearance by MoEF&CC dated 03.05.2013 and 08.12.2014 in the



aforesaid 40 MLD, 50 MLD & 15 MLD CETPs. Further, to stop discharging of treated effluent into Buddha Nallah from 50 MLD, 40 MLD & 15 MLD CETPs.

- b) With valid consent under the Water Act, 1974/ Authorization under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 form PPCB and comply with all the conditions mentioned thereof.
- c) Undertaking regular calibration, maintenance and validation of the OCEMS analysers as per standard operating procedures/recommendations of the suppliers, so as to ensure generation of continuous & reliable data.

Vide the said directions dated 12.08.2024, the Punjab Pollution Control Board was further directed by Central Pollution Control Board as under:

- a. To prescribe disposal condition to respective CETPs in accordance with the Environmental Clearance by MoEF&CC dated 03.05.2013 & 08.12.2014.
- b. To prescribe inlet standards for CETP in accordance to the CETP notification dated 01.01.2016.
- c. To regularly undertake verification of member industries of the CETP for ensuring proper operation of PETP/ETP by individual member industry.

14) And whereas, notice to issue directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988 was issued to the SPV with an opportunity of personal hearing before Chairman of the Board on 13.09.2024 postponed to 18.09.2024. Sh. Lalit Jain, Director of the SPV (CETP of 15 MLD) alongwith Sh. I.K. Kapila, Advocate, Hon'ble Supreme Court of India attended the hearing and submitted a written reply which was taken on record. The representatives stated that although the EC was obtained by the SPV for ZLD based treatment but later on the project was conceived on the SBR based secondary level treatment. The representatives further contended that other two CETPs of 40 MLD & 50 MLD capacity were duly sanctioned without any condition / requirement for ZLD level treatment. Regarding the submission of Bank Guarantee as per decision of personal hearing afforded to the SPV by Chairman of the Board on 16.06.2023, the representatives informed that the SPV has challenged the said decision by way of filing appeal before the Appellate Authority and the decision is pending. The representatives disagreed with the technical observations as reported by the CPCB and did not find the same acceptable to the SPV and insisted not to penalize the SPV on the basis of the said report. The representatives further informed that the SPV has applied for obtaining the consent to operate under the Water (Prevention & Control of Pollution) Act, 1974 with the Board. During hearing, it was observed by the Competent Authority that the SPV has been constantly pursued by the Board to submit proposal for upgradation of the CETP to ZLD technology in consonance with the EC conditions and thus not to discharge its effluent into the Buddha Nallah. However, the SPV has not taken any step in



this direction. The Ludhiana city has been declared as critically polluted area due to various reasons and one of the reasons is the activities of the industrial units in violation of the environmental norms. Though the Board has imposed EC and performance Bank Guarantee but the SPV is still violating the provisions of the Water (Prevention and Control of Pollution) Act, 1974. The representatives of the SPV could not give any satisfactory reply to the observations raised during the hearing. After detailed deliberations and hearing the representatives of SPV, officers of the Board and taking into consideration various factors including the seriousness of the issue, the Chairman of the Board observed that the objective to restrain the discharge of effluent into Budha Nallah cannot be achieved except with the issuance of directions. It is a fit case to invoke the provisions of section 33-A of the Water (Prevention and Control of Pollution) Act, 1974 for issuance of suitable directions to the SPV operating the CETP of 15 MLD capacity at Bahadurke Road, Ludhiana. Hence, the Chairman of the Board in exercise of the powers conferred u/s 33-A of the Water (Prevention and Control of Pollution) Act, 1974 decided to issue the following directions to the SPV of CETP of 15 MLD capacity:

1. The SPV shall ensure that the operation / augmentation of treatment system of CETP is appropriately made, so as to meet with the prescribed discharge standards and to comply with the disposal conditions mentioned in the Environmental Clearance granted by the Ministry of Environment, Forest and Climate Change dated 08.12.2014.
2. The SPV shall immediately stop the discharge of effluent from the CETP of 15 MLD capacity into Buddha Nallah or any other surface water body.

Apart from the issuance of directions u/s 33-A of the Water (Prevention and Control of Pollution) Act, 1974 to the SPV of 15 MLD CETP as mentioned above it was also decided to impose the Environmental Compensation since the start of CETP considering continued violations being committed by the SPV by way of discharging its effluent into the Budha Nallah in violation of the conditions of Environmental Clearance granted by the Ministry of Environment, Forest and Climate Change by adjusting the period / amount of the EC already imposed by the Board and deposited by the SPV.

15) Accordingly, directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 was issued to the SPV vide Board's letter no. 5802-03 dated 25.09.2024.

16) It is pertinent to mention here that the Hon'ble Supreme Court of India has considered the concept of Polluter Pays Principle in Indian Council for Enviro Legal Action and Others v/s Union of India and Others (1996) 3SCC 212, Vellore Citizens Welfare Forum v/s Union of India (1996) 5 SCC 647 and held that Polluter Pay's Principle is accepted principle and part of environmental law of the country even without specific statute.



17) It is mentioned that from period 07.08.2020 (i.e. date of commissioning of CETP) to 18.09.2024 (date of hearing), the amount of Environmental Compensation (EC) was calculated as Rs. 4,51,20,000/- as per following details:

EC	=	PI x N x R x S x LF
PI	=	Violation under Water Act, 1974 by red category unit = 32
N	=	Number of days = 1504 (07.08.2020 to 18.09.2024)
R	=	A factor in Rupees = 500 (Large Scale red category project)
S	=	Large Scale project = 1.5
LF	=	Municipal Corporation i.e. Ludhiana having population between one million to five million = 1.25
EC	=	32 x 1504 x 500 x 1.5 x 1.25 = Rs. 4,51,20,000/- (Rs. Four Crore Fifty One Lac Twenty thousand only)

18) Thus, in view of the above recorded facts, the matter was considered for imposition of Environmental Compensation for the period of violation from 07.08.2020 to 18.09.2024 in accordance with the formula and methodology evolved by the Central Pollution Control Board and adopted by the Punjab Pollution Control Board. The amount of Environmental Compensation for the period of violation from 07.08.2020 to 18.09.2024 (1504 days) was calculated as Rs. 4,51,20,000/- (Rs. Four Crore Fifty One Lac Twenty thousand only).

19) And whereas, the Environmental Compensation of Rs. 77,62,500/- (Seventy Seven Lac Sixty Two Thousand Five Hundred Only) has already been imposed on the SPV, as per details given in the order above.

20) Hence, the amount of Rs. 3,73,57,500/- (i.e. amount after subtracting from total amount of EC calculated and EC imposed) is hereby imposed on the SPV. Therefore, the SPV is directed to deposit an amount of Rs. 3,73,57,500/- (Rs. Three Crore Seventy Three Lac Fifty Seven Thousand Five Hundred only) as Environmental compensation with the office of the Punjab Pollution Control Board within 15 days, from the date of receipt of this order, failing which, the Board shall be constrained to initiate necessary action for recovery of the amount of Environmental Compensation by adopting coercive measures, thereafter.

21) Take notice that no further intimation or reminder will be issued by the Board in this regard. Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana is directed to ensure compliance of directions issued in the case. A copy of this order be supplied to all the concerned for compliance.

Adarsh Pal Vig
(Prof. (Dr.) Adarsh Pal Vig)
Chairman



ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਕੰਟਰੋਲ ਬੋਰਡ
PUNJAB POLLUTION CONTROL BOARD



Zonal Office-II, E-648-B, Back Side CICU Office, Phase-5, Focal Point, Ludhiana
E-mail: seezo2ldhppcb@yahoo.com

Ph No. 0161-2670141

No. PPCB/SEE/ZO-2/LDH/2025/.....
To 1824-25 Registered

Dated ...19/09/2025

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

Subject: Imposition of Environmental Compensation upon CETP of 15 MLD capacity installed at Bahadur ke Road, Dyeing Complex, Ludhiana for violation the provisions of Water (Prevention & Control of Pollution) Act, 1974.

Please find enclosed order no. 421 dated 18.09.2025 passed by the Competent Authority of the Punjab Pollution Control Board, whereby, the Environmental Compensation amounting to Rs. 69,00,000 /- (Rs. Sixty Nine Lacs) has been imposed upon the Special Purpose Vehicle (SPV) i.e. CETP of 15 MLD capacity for violation the provisions of Water (Prevention & Control of Pollution) Act, 1974 for the period from (19.09.2024 to 06.05.2025), for information and compliance. It is requested to deposit the Environmental Compensation, immediately after receipt of this order.

DA/as above

Environmental Engineer (CETP)

Endst. No. 1826

Dated...19/09/2025

A copy of the above along with order no. 421 dated 18.09.2025 is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana for information and necessary action. He is requested to get the copy of the above said order received by the SPV.

DA/as above

Environmental Engineer (CETP)



ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਕੰਟਰੋਲ ਬੋਰਡ
PUNJAB POLLUTION CONTROL BOARD

No. 421

Dated. 18/9/25

Subject: Imposition of Environmental Compensation upon CETP of 15 MLD capacity installed at Bahadur ke Road, Dyeing Complex, Ludhiana for violation of the provisions of Water (Prevention and Control of Pollution) Act, 1974

Order

The Punjab Pollution Control Board being the statutory regulatory authority is implementing the provisions of the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 and the rules made there under in the State of Punjab. The main objective of the Board is maintaining or restoring the wholesomeness of water, the preservation of the quality of air and the protection and improvement of the environment.

2) The Government of India, Ministry of Environment, Forest & Climate Change (MoEF&CC) has declared various clusters in the Country as Critically Polluted Areas (CPA), Severely Polluted Area (SPA) based on Cumulative Environmental Pollution Index (CEPI) score. Due to increased industrialization, activities of the Industrial units and some other identical reasons, Ludhiana city has been declared as Critically Polluted Area by the Central Pollution Control Board.

3) The Bahadur ke Textile & Knitwear Association (BKTKA) has setup a Common Effluent Treatment Plant (CETP) of capacity 15 MLD for treatment of waste water from the Cluster of textiles dyeing industries located at Bahadur ke Road, Ludhiana.

4) The SPV was granted Environmental Clearance by the Ministry of Environment, Forest and climate Change vide letter no. F. No.10-119/2011-IA.III dated 08.12.2014 for establishment of Common Effluent Treatment Plant of capacity 15 MLD for treatment of trade effluent of cluster of dyeing industries of Bahadu ke Road, Ludhiana subject to the specific condition that "the project proponent shall maintain Zero Liquid Discharge (ZLD).

5) In a follow-up meeting dated 03.03.20216 of the Appraisal Committee on CETPs proposal of CETP from BKTKA to initiate the CETP on conventional treatment

ਵਾਤਾਵਰਣ ਭਵਨ, ਨਾਭਾ ਰੋਡ, ਪਟਿਆਲਾ-147001

Vatavaran Bhawan, Nabha Road, Patiala -147001

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system in Phase-II for which they will apply to the MoEF&CC at a later stage as an up-gradation case. Accordingly the SPV was granted Consent to Operate (CTO) was granted Consent to Operate (CTO) vide no. CTOW/Varied/LDH3/2020/11846013 dated 10.09.2020 having validity upto 31.03.2021 for 1st phase of conventional treatment.

6) As such, the SPV was bound to upgrade the CETP based on ZLD technology and to achieve the stringent parameters as mentioned in the DPR submitted to the MoEF&CC, Govt. of India, while obtaining grant-in-aid as well the standards for textile industries and CETPs as notified by the MoEF&CC, Govt. of India on 01.01.2016.

7) The SPV is violating the provisions of Water (Prevention and Control of Pollution) Act, 1974 since its inception on 25.09.2021, by way of not upgrading the CETP to ZLD Technology and by not achieving the standards as per the DPR submitted by it while obtaining grant-in-aid as well the standards for textile industries and CETPs as notified by the MoEF&CC, Govt. of India on 01.01.2016.

8) The SPV has been continuously persuaded by the Board for upgrading the CETP by adopting ZLD technology and to achieve the prescribed standards. Accordingly, the SPV has been afforded personal hearing before the chairman of the Board many time, i.e. on 11.09.2020, 26.08.2021, 27.02.2022, 19.04.2022, 16.06.2023 and on 09.08.2024, but the SPV has failed to submitted any proposal for upgrading the CETP to ZLD technology and also has failed to achieve the standards as per DPR submitted by it to the MoEF & CC and the standards as prescribed by the MoEF & CC vide notification dated 01.01.20216.

9) On account of various violations of the provisions of Water (Prevention and Control of Pollution) Act, 1974, environmental Compensation of Rs. 77,52,500/- vide order no 335 dated 04.10.2022 for the period of 25.09.2021 to 19.04.2022, which was got en-cashed from bank guarantee of Rs. 2,40,00,000/- already submitted by the SPV with the Board. The balance amount of EC amounting to Rs. 3,73,57,500/- (i.e. amount after subtracting from total amount of EC of Rs. 4,51,20,000/- and EC en-cashed from bank guarantee of Rs. 77,62,500/-) was imposed on the SPV vide Board's order no. 03 dated 08.01.2025



10) Thereafter, a third party monitoring of the CETP was carried out through Shri Ram Institute for Industrial Research and found that the industry was not using meeting with the prescribed standards with respect to BOD (119 mg/l), COD (484 mg/l), Oil & Grease (35 mg/l), TSS (140 mg/l), TDS & FDS (5344 mg/l) and SAR (32.3 mg/l). Accordingly, the Board has issued notice u/s 33-A of the Water Act, 1974 for non-compliances including that for non-adopting ZLD and noncompliance of environmental norms with opportunity of personal hearing before the Chairman of the Board on 07.01.2025.

11) The SPV of 15 MLD during a hearing held on 07.01.2025 before the Competent Authority of the Board had disclosed that the CETP approached the MoEF&CC, Government of India for annulling the condition in the Environmental Clearance that the Project Proponent shall maintain zero discharge and to allow the CETP to discharge treated effluent as per MoEF&CC standards. The case was considered by the EAC-II of the MoEF&CC in its meeting held on 17.12.2024 but the case was deferred to seek Clarification from the policy section of the MoEF&CC with regard to the amendment in the conditions of earlier granted Environmental Clearance since as of now the CETP of textile/dyeing units are not covered under the ambit of EIA notification in light of the notification dated 19.12.2024. With respect to the allowing of discharge of treated water into Buddha Nallah, the committee of MoEF&CC during the above meeting held on 17.12.2024 observed that the instant project lies in CPA-Ludhiana and in CEPI score, the component of water is higher, accordingly technicality for giving such relaxation for discharge of treated water may be obtained from Central Pollution Control Board by the project proponent. The SPV requested to provide 15 days' time for filing addendum to their reply after considering the outcome to their application for amendment in EC and considering the results of CPCB that have re-monitored the CETP in December 2024.

12) Accordingly, another opportunity of personal hearing was given before the Chairman of the Board on 22.01.2025. However, no one on behalf of the SPV attended the hearing but submitted a written reply. After hearing, the officers of the Board and considering the material facts of the case, the Chairman of the Board decided as under:



1. *The SPV shall comply with the directions issued by the Board u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 vide no. 5802 dated 25.09.2024.*
2. *The SPV shall comply with the conditions of Environmental Clearance, conditions stipulated by MoEF&CC while allowing grant-in-aid and to ensure compliance of environmental norms.*
3. *The SPV, within 15 days, shall deposit the Environmental Compensation already imposed on it by the Board from time to time.*
4. *Complaint be filed in the Competent Court of Law against the SPV (15 MLD CETP), its directors and persons responsible for operation of the CETP and other governing activities related to CETP for not complying with the environmental norms.*
5. *Environmental Compensation be imposed on the SPV for continued violation w.e.f. 19.09.2024 till date of this hearing. Environmental Engineer, Regional Office-3, Ludhiana shall calculate the Environmental Compensation to be imposed on the SPV and place the matter for approval of Competent Authority, within 15 days.*
6. *Environmental Engineer, Regional Office-3, Ludhiana shall submit the compliance of the decisions of the personal hearing immediately after 15 days along with latest status and further recommendations in the matter.*

13) The SPV had neither submitted compliance of the above decisions not provided any follow up with respect to the application pending with MoEF&CC for annulling the condition of ZLD earlier prescribed in the environmental clearance.

14) In compliance to the orders passed by the Hon'ble NGT in O.A No. 225 of 2022, a team of officers from the CPCB visited CETP of 15 MLD on 24.12.2025 & 25.12.2025 and carried out effluent sampling of CETP of 15 MLD so as to submit the compliance report before the Hon'ble NGT.

15) After carrying out visit to the four CETPs, the CPCB had submitted compliance report before the Hon'ble NGT, which is now sent to the PPCB to ensure compliance of the directions already issued by the CPCB u/s 18(1)(b) of the Water (Prevention & Control of Pollution) Act, 1974 and by PPCB u/s 33-A of the Water



(Prevention & Control of Pollution) Act, 1974 to stop discharge of the CETP 50 MLD, CETP 40 MLD & CETP 15 MLD into Buddha Darya and to send the action taken report in the matter. The compliance report submitted by the CPCB before the Hon'ble NGT has been examined and major observations of the CPCB with respect to CETP 15 MLD are as under

:-

- a. *The CETP is discharging treated effluent into Buddha Nallah through a dedicated underground pipeline at around 5 Km from the CETP. However, as per the Environmental Clearance (EC) issued by MoEF&CC to the CETP dated 08/12/2024, the CETP is required to establish a Zero Liquid Discharge (ZLD) system.*
- b. *Concentration of various parameters are COD: 330 mg/l (Standard: 250mg/l), BOD:123 mg/l (Standard: 30 mg/l), FDS : 3492 mg/l(Standard: 2100 mg/l), Sulphide :6.0 mg/l (Standard:2 mg/l) and Chloride : 1948 mg/l (Standard: 1000 mg/l), which is beyond the permissible limits of prescribed standards of MoEF&CC.*
- c. *Concentration of various parameters are COD:330 mg/l(Standard:50 mg/l), TSS:52 mg/l(Standard: 20 mg/l), BOD:123 (Standard:10 mg/l), TDS:3776 mg/l(Standard:2100 mg/l), Sulphide:6.0 mg/l (Standard: 0.1 mg/l and Phenolic Compounds: 0.97 mg/l (Standard: Nil mg/l), which is beyond the stringent parameters as prescribed by the Board.*
- d. *The overall performance of CETP with regard to removal efficiency of COD, BOD, TSS, FDS, Chloride and Sulphide based on the analysed concentration of respective parameters was found to be 21.2%, 38.5%, 83.6%, 3.2%, 0% and 16.7% respectively which needs improvement to achieve the prescribed standards.*
- e. *The biomass concentrations in the SBR basin in terms of MLSS and MLVSS were found as 2175 mg/l and 807 mg/l respectively, with MLVSS/MLSS ratio as 0.37, which is too low to operate biological treatment system efficiently, as indicated from very low COD and BOD removal efficiency. The recommended ML.VSS/MLSS ratio is 0.6 to 0.8.*



f. *The Online Continuous Effluent monitoring system (OCEMS) installed at inlet and final outlet of CETP for measuring pH, TSS, COD and BOD, which was last calibrated on May 12, 2024 and significant variation was observed in the analysis value and the OCEMS value on the day of inspection. A wide variation was observed in the analysis value and the OCEMS value on the day of inspection. The OCEMS values for TSS, COD and BOD were found to be 69% to 84% lower in comparison to analysis values, which indicate improper calibration of OCEMS.*

16) As per monitoring conducted by CPCB in the month of April 2024 and December 2024, various parameters at the inlet of CETP were also found much beyond the design parameters as mentioned by the SPV at the time of submission of DPR for obtaining grant in aid from the Central and State Government. Similar trend was observed in the earlier monitoring carried out by the Board and other agencies.

17) The SPV applied for obtaining consents under the Water (Prevention & Control of Pollution) Act, 1974 and Air (Prevention & Control of Pollution) Act, 1981 through OCMMS portal.

18) Accordingly, the SPV was issued notice to issue directions u/s 33-A of the Water Act, 1974 as amended in 1988 and show cause notice for refusal of consent to operate under the Water Act, 1974 and Air Act, 1981 vide Board's letter no. 2811-12 dated 21.04.2025 with an opportunity of personal hearing before Chairman of the Board on 06.05.2025, wherein it was decided as under:-

1. *In compliance to the instructions dated 09.03.2025 issued by CPCB, in continuation of its earlier directions dated 12.08.2024 issued to the PPCB u/s 18 (1) (b) of the Water (Prevention & Control of Pollution) Act, 1974, SPV shall:-*

(a) *Comply with the directions issued by the Board u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 vide no. 5802-03 dated 25.09.2024 for stoppage of the discharge of effluent from CETP.*



- (b) *into Buddha Nallah and to comply with the environmental norms alongwith other directions mentioned therein.*
- (c) *Implement Zero Liquid Discharge treatment proposal immediately and shall submit a comprehensive Action Taken Report (ATR) to the Board in this regard, within one month.*
- (d) *Comply with the other observations / finding of the CPCB as mentioned in their communication dated 09.03.2025 and as mentioned in the relevant paragraphs of these proceedings.*
- (e) *Comply with the conditions stipulated by MoEF&CC while allowing grant-in-aid to the SPV and to ensure compliance of environmental norms and environmental standards.*
2. *The operational capacity of the CETP is curtailed by 20 percent of the total installed capacity in view of non-compliance of the environmental standards. The SPV shall make in-house mechanism to ensure that the CETP shall not be operated beyond 80% of its installed capacity and issue requisite instructions to its member units in this regard and submit Action Taken Report immediately.*
3. *No new NOC or NOC for expansion or varied consent to operate for increase in the discharge of the trade effluent shall be granted to the member units connected with the CETP except in the cases of scattered industrial units operating in non-CETP governed areas*
/ Non-designated areas of city to whom Board has issued directions for shifting to CETP areas.
4. *The SPV shall ensure that the designed DPR parameters are achieved at the inlet of the CETP so as to improve the efficiency of CETP and achieve the design as well as prescribed standards at the outlet. For that,*



- (a) *The SPV shall ensure that no member unit discharges the effluent from its outlets into the CETP of 15 MLD capacity, which is not meeting with inlet design standards of the CETP. The SPV shall further prepare and place mechanism for identification of such member units.*
 - (b) *The SPV shall issue directions to the member units to impart suitable pre-treatment to the effluent so as to ensure that the effluent discharged by the member units in the dedicated conveyance system of the CETP complies with the designed inlet parameters proposed in the DPR.*
 - (c) *SPV and member units shall explore the possibility of segregating high TDS streams at industry level and provide pre-treatment to bring the parameters at the outlet of the industry within the designed DPR parameters prescribed at the inlet of CETP.*
 - (d) *In case of non-compliance of DPR inlet standards by the member units, the SPV shall take necessary punitive actions against the member units and inform the Board, accordingly.*
5. *The SPV shall deposit the environmental compensation of Rs. 3,73,57,500/- earlier imposed by the Board and already conveyed to the SPV, within 15 days, failing which the matter shall be referred to the Revenue Authorities for recovery of the same.*
6. *Environmental Compensation shall be imposed on the SPV for non-compliance of environmental norms for a further period from 19.09.2024 to 06.05.2025.*
7. *The SPV shall immediately make arrangements for installation of advance mechanism for decolorization of treated effluent of CETP and submit Action Taken Report, within 15 days.*



8. The decision on the consent application submitted by the SPV under the Water Act, 1974 and the Air Act, 1981 shall be taken after the compliance by the SPV with respect to decision as above.

9. Environmental Engineer, Regional Office-3, Ludhiana shall submit the compliance of the decisions of the personal hearing as per time schedule along with latest status and further recommendations in the matter including that to decide the consent applications. He shall also calculate the environmental compensation for a further period from 19.09.2024 to 06.05.2025 and place the matter for getting the same verified from the EC Verification Committee.

The proceedings of the hearing were conveyed to the CETP vide letter no. 3287-88 dated 15.05.2025 for compliance.

19) The present order is being passed in compliance to the decisions taken during the hearing held on 06.05.2025 for imposition of environmental compensation. It is pertinent to mention here that the Hon'ble Supreme Court of India has considered the concept of Polluter Pay's Principle in Indian Council for Enviro Legal Action and Others v/s Union of India and Others (1996) 3SCC 212, Vellore Citizens Welfare Forum v/s Union of India (1996) 5 SCC 647 and held that Polluter Pay's Principle is accepted principle and part of environmental law of the country even without specific statute. The Principle of sustainable development and precaution are also held to be the accepted principles and part of environmental laws.

20) The CETP is operating without the valid consent of the Board under the Water (Prevention & Control of Pollution) Act, 1974 and is not complying with the directions issued by the Board as explained herein above and the industry is also not cooperating with the officers of the Board. These facts are sufficient for the imposition of Environmental Compensation by invoking the Principles of Polluter Pays, sustainable developments and precaution. The industry has, thus, made itself liable for Environmental Compensation for the period of violation from 19.09.2024 to 06.05.2025.



21) Thus, in view of the above recorded facts, the matter was considered for imposition of Environmental Compensation for the period of violation from 19.09.2024 to 06.05.2025 in accordance with the formula and methodology evolved by the Central Pollution Control Board and adopted by the Punjab Pollution Control Board. The amount of Environmental Compensation for the period of violation from 19.09.2024 to 06.05.2025 (230 days) was calculated to be Rs. 69,00,000/- as per the following details:

Particulars	Values	
EC	PI x N x R x S x LF	
PI	32	Being violation of only Water Act, 1974
N	230	from 19.09.2024 to date of hearing i.e. 06.05.2025
R	500	Since unit is large scale unit
S	1.5	For large scale unit
LF	1.25	As population of Municipal Corporation, Ludhiana falls between 1 to 5 Million.
EC	32x 230 x 500x 1.5 x 1.25 = 69,00,000/-	

22) Therefore, the industry CETP of 15 MLD capacity installed at Bahadur ke Road, Dyeing Complex, Ludhiana is hereby directed through its Director to deposit an amount of Rs. 69,00,000/- as Environmental compensation for the period of violation from 19.09.2024 to 06.05.2025 with the office of the Punjab Pollution Control Board within 15 days, from the date of receipt of this order, failing which, the Board shall be constrained to initiate necessary action for recovery of the amount of Environmental Compensation by adopting coercive measures, thereafter.

23) Take notice that no further intimation or reminder will be issued by the Board in this regard. Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana is directed to ensure compliance of directions issued in the case. A copy of this order be supplied to all the concerned for compliance.

24) The decision to impose the EC for the period of Violation from 19.09.2024 to 06.05.2025 upon 15 MLD (Calculated to be Rs. 69,00,000/- by the EC Verification Committee) was taken by the then Chairman of the Board after hearing the Project



Proponent on 06.05.2025, the proceedings of which were conveyed vide letter dated 15.05.2025.

The orders are being issued after the approval of the Competent Authority of the Board.

A handwritten signature in blue ink, appearing to be 'G. S. Chahal'.

Member Secretary

5257



Punjab Pollution Control Board

Zonal Office-2, E-648-B, Phase-V,
Focal Point, Ludhiana

Website:- www.ppcb.gov.in

E-mail: seezo2ldhppcb@yahoo.com

No. 5255

Date 08/09/25

To

**The Deputy Commissioner,
Ludhiana**

Subject: Recovery of Environmental Compensation imposed on M/s Bahadurke Textile Knitwear & Association, Bahadurke Road, Ludhiana for the violations of the provisions of Water Act, 1974 with respect to 15 MLD CETP established for Bahadurke Dyeing Cluster, Ludhiana.

The Bahadurke Textile Knitwear & Association, Bahadurke Road, Ludhiana, a Special Purpose Vehicle (SPV) is responsible for the establishment, up-gradation, operation and maintenance of 15 MLD CETP for treatment of waste water from the cluster of textiles dyeing industries located at Bahadurke Road, Ludhiana and has been operational since January, 2018.

2) The SPV was granted Environmental Clearance by the Ministry of Environment, Forest and Climate Change vide letter no. F.No.10-119/2011-IA.III dated 08.12.2014 for establishment of Common Effluent Treatment Plant of capacity 15 MLD for treatment of trade effluent of cluster of dyeing industries of Bahadurke Road, Ludhiana with certain conditions as mentioned therein including establishment of CETP on ZLD based Technology and no discharge in Budha Nallah.

3) The Ministry of Environment, Forest and Climate Change (MoEF&CC) released Grant-in-Aid to the SPV for Special Purpose Vehicle (SPV) for setting up of 15 MLD CETP at Bahadurke Road, Ludhiana. The said grant was released based on the Detailed Project Report (DPR) submitted by the SPV, which was based on achieving stringent environmental standards in first phase and adoption of ZLD based treatment system in 2nd phase.

4) The Punjab Pollution Control Board has been issuing notices to the SPV for the various non-compliance including non-adoption of ZLD and non-achievement of standards. The SPV has also been regularly directed by the Board for upgrading the CETP to ZLD treatment technology and for achieving the prescribed standards. However, the SPV has neither adopted ZLD treatment technology nor achieved desired standards. Due to non-adoption of ZLD by the SPV and also due to non-achievement of prescribed standards, the Punjab Pollution Control Board has imposed Environmental Compensation on the SPV.

7) On account of various violations of the provisions of Water (Prevention and Control of Pollution) Act, 1974, as detailed above, from the period of 07.08.2020 (i.e. date of commissioning of CETP) to 18.09.2024 (date of hearing), the amount of

Environmental Compensation (EC) was imposed as Rs. 4,51,20,000/- in accordance with the formula and methodology evolved by the Central Pollution Control Board. The Environmental Compensation amounting to Rs. 77,62,500/- imposed vide order no. 335 dated 04.10.2022 for the period of 25.09.2021 to 19.04.2022, was got en-cashed from bank guarantee of Rs. 2,40,00,000/- already submitted by the SPV with the Board. The balance amount of EC amounting to Rs. 3,73,57,500/- (i.e. amount after subtracting from total amount of EC of Rs. 4,51,20,000/- and EC encashed from Bank Guarantee of Rs. 77,62,500/-) was imposed on the SPV vide Board's order no. 03 dated 08.01.2025 (Copy enclosed).

8) Lastly, the SPV was afforded an opportunity of personal hearing before issuing directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 for closure, with an opportunity of personal hearing before the Chairperson of the Board on 10.07.2025, wherein it was decided that the SPV shall deposit the environmental compensation of Rs. 3,73,57,500/- earlier imposed by the Board and already conveyed to the SPV, within 15 days, failing which the matter shall be referred to the Revenue Authorities for recovery of the same.

9) The SPV has also filed an appeal before Hon'ble NGT against the above said directions issued by the Board to stop discharge of 15 MLD CETP into Budha Nallah or any other surface water body and against the Environmental Compensation imposed by the Board. The Hon'ble NGT in its last hearing held on 22.07.2025 in the matter has directed to place on record the full details relating to the calculation of environmental compensation and status of its recovery. A copy of order passed by the Hon'ble NGT dated 22.07.2025 is also enclosed herewith for kind perusal.

10) The SPV, till date, has failed to deposit the Environmental Compensation amounting to **Rs. 3,73,57,500/-** despite of continuous persuasion of the Board, as detailed above.

11) In view of above, it is requested to direct the concerned Revenue Authority to recover the Environmental Compensation of **Rs. 3,73,57,500/-** from M/s Bahadurke Textile Knitwear & Association, Bahadurke Road, Ludhiana, in accordance with law of Punjab Land Revenue Act or any other Act for the time being in force, please.

This issues with the approval of competent authority.

DA/As above

[Signature]
 Senior Environmental Engineer
 For & on behalf of Chairperson, PPCB
 CA

Endst. No. 5056

Dated. 08/09/2025

A copy of the above is forwarded to the Secretary to Govt. of Punjab, Department of Science, Technology and Environment, for kind information please.

[Signature]
 Senior Environmental Engineer
 For & on behalf of Chairperson, PPCB
 CA



No. 31908.....

Dated. 12-9-2015.....

To

The Director
Indian Institute of Technology,
Ropar.

Subject: Letter of award (LoA) for Source Apportionment and Comprehensive Investigation of Pollution in Buddha Dariya.

This is reference to your proposal dated 29.08.2015 on the subject cited above. In an endeavor to enable rejuvenation of Buddha Dariya, the Government of Punjab through Punjab Development Commission, Chandigarh and Punjab Pollution Control Board, Patiala is pleased to award the study to Indian Institute of Technology (IIT), Ropar titled "**Source Apportionment and Comprehensive Investigation of Pollution in Buddha Dariya**". The study aims to provide scientific foundation for River Rejuvenation efforts in the State and will enable regulators, industries, and local bodies to implement targeted interventions, strengthen compliance monitoring, and restore the ecological and socio-economic value of Buddha Dariya and the downstream River Sutlej.

The objectives, scope of work, key deliverables, timelines of the study etc. along with term & conditions are delineated below:

1. Objective:

- Identifying and quantifying pollution sources (domestic sewage, industrial effluent, dairy waste, municipal solid waste, and unauthorized discharges).
- Assessing the performance of existing treatment infrastructure (CETPs, STPs, CBG plants, ETPs, re-processors).
- Developing a data-backed source apportionment of the pollution levels in Buddha Dariya across major authorized and unauthorized sources.
- Providing high-level short-term and long-term interventions for the rejuvenation of Buddha Dariya.

2. Methodology/Scope of Work:

A. Field Assessment and Mapping

- Geo-tag mapping of identified, organized, and unorganized discharge sources, dairies, and municipal solid waste dumps on maps for future referencing.

B. Water Quality Monitoring

- Strategic Sampling: Stretch of Buddha Dariya, Upstream, midstream, downstream, River Sutlej, major feeder drains, Harike-Pattan (50 sampling locations). Day and night sampling to capture diurnal variations (Oct-Dec 2015 season). Minimum of three samples for every location.

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- Parameters: pH, DO, BOD, COD, TDS, TSS, nutrients, heavy metals, microbial contaminants, industry-specific pollutants.
- Validation of OCEMS data with water sampling data.
- Sewage Network Sampling: ~50 samples in the city of Ludhiana to identify unauthorized discharge into sewage (50% during night/early morning).
- CETPs/STPs/CBG/Dairy Complexes: Performance evaluation through inlet–outlet sampling (component sampling wherever required).

C. Inflow Characterization

- Sector-wise estimation of pollution and sources of pollutants with % values ascribed (domestic, industrial, dairy, solid waste, leachate, and other misc. sources, etc.).
- Load estimation for each CETP/STP and other major sources.
- Identification of possible non-compliant/illegal discharges and their contribution

D. Evaluation of Treatment Infrastructure

- CETPs (dyeing, electroplating, dairy): technical performance review, inlet–outlet quality, compliance gaps, bottlenecks.
- STPs: design vs. actual load, bypass issues, sludge management.
- CBG and re-processors: compliance and efficiency.

E. Recommendations and Action Plan

- **Short-term:** For example, Plugging unauthorized discharges, operational corrections in CETPs/STPs, night-time enforcement.
- **Medium-term:** For example, Infrastructure upgradation / augmentation, automation, OCEMS strengthening, alternate disposal/reuse of treated effluent, stricter sludge handling.
- **Long-term (if any):** River ecology restoration, treated water reuse strategies, comprehensive enforcement and monitoring roadmap.
- Recommendations to be supported, by indicative costs, feasibility analysis and timelines for short, medium & long-term action plans.

3. Key Deliverables

- Source Apportionment Report – Quantification of pollution by source.
- Treatment Infrastructure Audit Report – Performance evaluation and compliance gaps
- Evidence Compendium – Photographs, lab reports (for those analyses not conducted outside the IIT Lab), sampling logs, OCEMS validation.



- Action-Oriented Recommendations – High level: Immediate, medium, and long-term interventions with broad cost implications.
- Technical Note for Court Submission – Concise, finding-based note for Hon'ble Court and regulators.

4. Schedule / timelines

Period of the study will be 07 months and it is to be completed by 31st March 2026 as per the following timelines for various tasks:

Activity	Months			
	2	2	2	2
	1–2 (by 31 Oct 2025)	3–4 (by 31 Dec 2025)	4–5 (by 31 Jan 2026)	6–7 (by 31 Mar 2026)
Sampling of CETPs for dyeing clusters (15, 40, 50 MLD); Preliminary infrastructure audit		Report 1 – Preliminary Findings, Operational bottleneck, infrastructure gaps, recommendations, and timelines		
Field assessment (geo tag mapping of drain outlets) on Buddha Dariya patch; Assessment of CETPs (electroplating, dairy), STPs, CBG plants			Report 2 – Infrastructure Gaps, Operational bottleneck analysis recommendations, and timelines	
Source apportionment analysis based on Oct–Dec 2025 sampling; pollutant tracking, trend analysis				Report 3 – Interim Source Apportionment
Consolidation of findings; Final analysis of sources; Detailed recommendations with costing and implementation roadmap	Final Report – Comprehensive Source Apportionment & Action Plan			

5. Support to be provided by the Govt

- The Government will ensure full support for the study. The stakeholder departments of the Government, Special Purpose Vehicles (SPVs) of CETPs, industries and other concerned agencies shall provide information / data available with them as required for the study by the IIT.



- The Government will facilitate to provide access to IIT personnel in the premises where study will be conducted (CETPs, STPs, CBG plant, Industries etc.).

6. Monitoring

The project will be monitored by the Punjab Pollution Control Board under the supervision of Chief Environmental Engineer, Ludhiana

7. Award Price

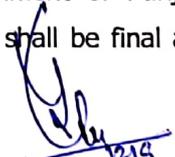
The total award price for study for the entire scope of work as detailed at point 2 above shall be for Rs. 1,44,38,600/- + GST @ applicable rates. Tax deduction at source shall be applicable as per rules.

8. Method of payment

- The complete payment shall be paid alongwith work order.
- Expenditure of the study shall be met from Environmental Compensation funds, in compliance of Hon'ble NGT orders dated 21.10.2022 passed in M.A. No. 74/2022 in O.A. No. 976/2019.
- The numbers of samples may varyup to max 10%.
- The study ambit can be extended with the mutual acceptance of the Government and IIT.
- The payment shall be made to IIT, Ropar's designated Bank Account with PAN details.

9. Difference of opinion / Disputes

Any difference of opinion or dispute which may arise during the study period shall be placed for resolution before the Administrative Secretary to Government of Punjab, Department of Science, Technology and Environment whose decision shall be final and binding upon the parties.


o/c Member Secretary

Endst. No. 31909

Dated 12-9-2025

A copy of the above is forwarded to the Chief Secretary to the Government of Punjab, Chandigarh for his kind information, please.


o/c Member Secretary

Endst. No. 31910-23Dated 12-9-2025

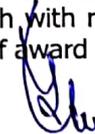
A copy of the above is forwarded to the following for information with request to extend full support for the conduct of study:

- 1) The Additional Chief Secretary, Department of Local Government, Punjab, Chandigarh
- 2) The Principal Secretary to Government of Punjab, Department of Water Resources, Punjab, Chandigarh
- 3) The Principal Secretary to Government of Punjab, Department of Department of New & Renewable Energy Sources, Chandigarh
- 4) The Secretary to Government of Punjab, Department of Science, Technology and Environment, Chandigarh
- 5) The Secretary to Government of Punjab, Department of Rural Development and Panchayats, Chandigarh
- 6) The Secretary to Government of Punjab, Department of Water Supply and Sanitation, Chandigarh
- 7) The Secretary to Government of Punjab, Department of Agricultural and Farmers' Welfare, Chandigarh
- 8) The Administrative Secretary to Government of Punjab, Department of Soil and Water Conservation, Chandigarh.
- 9) The Vice Chairperson, Punjab Development Commission, Chandigarh
- 10) The Chairperson, Punjab Pollution Control Board, Patiala
- 11) The Chief Executive Officer, Punjab Water Supply and Sewerage Board, Chandigarh
- 12) The Chief Executive Officer, Punjab Energy Development Authority, Punjab
- 13) The Deputy Commissioner, Ludhiana
- 14) The Commissioner, Municipal Corporation, Ludhiana.


o/c Member Secretary

Dated 12-9-2025Endst. No. 31924

A copy of the above is forwarded to the Director, Directorate of Environment and Climate Change, MIGSPA Complex, Sector-26, Chandigarh with request to release the funds for study report as explained and described in the letter of award above.


o/c Member Secretary