

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, NEW DELHI

Appeal No. 14/2025

(I.A. No. 107/2025 & I.A. No. 106/2025)

M/s Sumit Knit Fab

.....Appellant

Versus

Punjab Pollution Control Board & Ors.

.....Respondent(s)

INDEX

Sr. No.	Particulars	Page No.
1.	Short reply by way of affidavit of Er. Kanwaldeep Kaur, Environmental Engineer, Regional Office-1, Ludhiana on behalf of respondent Punjab Pollution Control Board.	1-11
2.	Annexure-A A Copy of datasheet for collection of samples during the visit on 03.01.2019.	12
3.	Annexure-B. A copy of water analysis report dated 10.01.2019.	13

4.	Annexure-C A copy of letter no. 634-35 dated 28.01.2019 of Punjab Pollution Control Board.	14-15
5.	Annexure-D A copy of letter no. 636-37 dated 28.01.2019 of Punjab Pollution Control Board.	16-17
6.	Annexure-E A copy of letter no. 638-641 dated 28.01.2019 of Punjab Pollution Control Board.	18
7.	Annexure-F A copy of request letter of the appellant for restoration of the electric supply (received on 22.04.2019).	19-20
8.	Annexure-G A copy of consent to operate letter dated 13.05.2019 under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981.	21-22
9.	Annexure-H A copy of the consents renewed by the Board on 03.03.2020 under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981 both valid upto 12.05.2020.	23-28
10.	Annexure-I A copy of report of the committee of officers.	29-34
11.	Annexure-J A copy of letter no 2502-03 dated 29.04.2024 vide which directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 were issued for closure.	35-37
12.	Annexure-K A copy of letter no. 2504-05 dated 29.04.2024 vide which directions were issued to PSPCL Authorities for disconnection of electric supply.	38-39

	disconnection of electric supply.	
13.	Annexure-L A copy of order no. 471 dated 05.12.2024 passed by the Competent Authority of the Board for the imposition of Environmental Compensation upon the appellant.	40-45

Date: 20/5/2025

Place: Ludhiana

Submitted by



(Er. Kanwaldeep Kaur)
Environmental Engineer,
Punjab Pollution Control Board, Regional
Office-1, Ludhiana

(On behalf of Punjab Pollution Control
Board)

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, NEW DELHI

Appeal No. 14/2025

(I.A. No. 107/2025 & I.A. No. 106/2025)

M/s Sumit Knit Fab

.....Appellant

Versus

Punjab Pollution Control Board & Ors.

.....Respondent(s)

Short reply by way of affidavit of Er. Kanwaldeep Kaur, Environmental Engineer, Regional Office-1, Ludhiana on behalf of respondent Punjab Pollution Control Board.

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

RESPECTFULLY SHOWETH

1. That briefly submitted, the appellant M/s Sumit Knit Fab has filed an appeal under section 18(1) read with sections 14, 15, 16 & 17 of the National Green Tribunal Act, 2010 before this Hon'ble Tribunal thereby challenging the order dated 05.12.2024 passed by Punjab Pollution Control Board (PPCB) whereby Environment Compensation (EC) of Rs. 91,55,000/- has been imposed upon the appellant.



-2-

2. That the Counsel for the appellant has made submissions before this Hon'ble Tribunal that the current appeal has been filed on the same facts and grounds on which earlier order was passed by PPCB which is subject matter of challenge in Appeal No. 37/2024 (heard on 15.01.2025). It is relevant to mention here that the appellant has challenged the order dated 24.07.2024 passed by Punjab Pollution Control Board imposing Environmental Compensation of Rs. 6,42,25,000/- on the appellant for operating the unit from 2005-2019 without valid permissions.
3. That the Counsel for the appellant has made further submission that in response to the show-cause-notice, two replies were filed but have not been considered by the Board while passing the impugned order whereby Environment Compensation (EC) of Rs. 91,55,000/- has been imposed. It was alleged that there was no proper opportunity of hearing in the matter.
4. That after consideration of the matter the Hon'ble Tribunal was pleased to pass an order dated 19.02.2025 directing the respondent Punjab Pollution Control Board to file reply in the case and to produce the original record leading to the passing of the impugned order.
5. That the deponent is working as Environmental Engineer in Punjab Pollution Control Board and is posted in the Regional Office-1 of the Board at Ludhiana. The deponent is well conversant with the facts of the case and is competent and authorized to swear and file the present reply by way of affidavit on behalf of the respondent Punjab Pollution Control Board.
6. That keeping in view the facts and circumstances of the case as well as the contents of the application, a short reply by way of affidavit of the deponent is being filed before this Hon'ble Tribunal mentioning therein the relevant facts of the case. However, the deponent undertakes to file a detailed reply, if there is any direction of the Hon'ble Tribunal in this regard. The relevant facts of the case may kindly be read in the following paragraphs.



7. That briefly submitted the appellant namely M/s Sumit Knit Fab situated at B-3, Industrial Area-A (Extension), Ludhiana is a small-scale red category unit engaged in the process of dyeing and washing of garments. In the month of January 2019, a complaint regarding illegal operation of the appellant unit was received in the office of the Board at Ludhiana. To verify the facts of the complaint, the site of appellant unit was visited by officers of the Punjab Pollution Control Board on 03.01.2019 and it was observed that the appellant industry was operating without the consents to operate of the Board under the Water (Prevention and Control of Pollution) Act, 1974. Though the ETP was in existence but untreated effluent was being discharged into sewer and the ETP was found not in operational condition. The effluent samples were collected by the visiting officers during the visit on 03.01.2019 and as per analysis report, various parameters were found beyond the limits prescribed by the Board [BOD-122 against 30 mg/l, TSS- 129 against 100 mg/l, COD-384 against 250 mg/l]. The visiting officers have prepared datasheet for collection of samples during the visit on 03.01.2019 and the same was signed by the Sh. Rishi Jethi, proprietor of the appellant industry in token of its correctness. A copy of datasheet dated 03.01.2019 is enclosed as **Annexure-A** and the water analysis report dated 10.01.2019 is enclosed as **Annexure-B**.
8. That keeping in view the grave violations, the directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 and under section 31-A of the Air (Prevention & Control of Pollution) Act, 1981 were issued to the appellant industry vide letter no. 634-35 dated 28.01.2019 and letter no. 636-37 dated 28.01.2019 respectively. A copy of letter no. 634-35 dated 28.01.2019 is enclosed as **Annexure-C** and copy of letter no. 636-37 dated 28.01.2019 is enclosed as **Annexure-D**. Simultaneously, directions under the said Acts were issued vide letter no. 638-41 dated 28.01.2019 to the Punjab State Power Corporation Ltd (PSPCL) authorities for disconnection of electric supply of the unit. A copy of letter

-4-

no. 638-641 dated 28.01.2019 is enclosed as **Annexure-E**. In compliance to above directions, the electric connection of the industry was disconnected by the PSPCL authorities.

9. That in reply to the directions issued by the Board as explained herein above, the appellant has submitted a request (received on 22.04.2019) for restoration of the electric supply mentioning that the industry has now installed new ETP consisting of the components as mentioned in the request letter. A copy of request letter (received on 22.04.2019) is enclosed as **Annexure-F**.
10. That the request letter of the appellant (received on 22.04.2019) was considered and the industry was granted consent to operate under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981 on 13.05.2019, both valid upto 12.11.2019 and the electric connection of the appellant industry was restored on temporary basis. A copy of consent to operate letter dated 13.05.2019 under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981 is enclosed as **Annexure-G**.
11. That the consents to operate of the appellant industry were renewed by the Board under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981 on 03.03.2020 both valid upto 12.05.2020. A copy of the consents renewed by the Board is enclosed as **Annexure-H**.
12. That thereafter a complaint was received from the office of Monitoring Committee (constituted by the Hon'ble National Green Tribunal) vide letter no. CMC/2020/981 dated 20.08.2020 to the effect that the appellant industry is doing the business of dyeing since the year 2005. The complaint was verified and in accordance with the reply submitted by the Department of Excise, Environmental Compensation of Rs. 6,42,25,000/- was imposed on the appellant for operating the unit from 2005-2019 without the valid

permissions. The orders of the Board were challenged separately by the appellant before the Hon'ble National Green Tribunal by way of filing Appeal no. 37/2024. It is relevant to mention here that appeal no. 37/2024 has been decided by the Hon'ble National Green Tribunal by an order dated 01.04.2025. The order passed by the Board has been set aside, but it has been recorded in the order dated 01.04.2025 by the Hon'ble National Green Tribunal that this order will not preclude the respondent Punjab State Pollution Control Board from passing a fresh order after giving due opportunity of hearing to the appellant and in accordance with Law including compliance of Principles of Natural Justice and the observations mentioned in the Judgment dated 01.04.2025. It is relevant to mention here that the imposition of Environmental Compensation with effect from the year 2005 to the year 2019 is a separate matter and is being dealt separately in accordance with the mandate of the Order/Judgment dated 01.04.2025 of this Hon'ble Tribunal.

13. That reverting to the present case it is submitted that in the meanwhile Sh. SL Verma has filed another complaint against M/s Sumit Knit Fab through Sh. Sant Balbir Singh Seechewal MP pointing out the deficiencies. A committee of officers was constituted by competent authority of the Board to enquire the matter. The committee of officers has submitted the report. Some observations have been raised in the report as mentioned below:-
- i. There is no account of 2026 KL. Whereas, the effluent may either be directly disposed of after the ETP plant to MC sewer without evaporation to save cost of energy involved in evaporation.
 - ii. There is possibility of unmetered water source from where processing activities but is not accounted in records.
 - iii. RO is not functioning properly and efficiently and there are chances that the industry might be discharging its treated effluent without reusing in the process.

-6-

- iv. It is neither feasible not advisable to use treated effluent with such a high TDS of around 1300 ppm for boiler feed or for dyeing/washing process as it will affect the boiler infrastructure as well as affect the quality of product being manufactured by the industry.
 - v. The possibility of discharge of effluent through flexible pipe from ETP or RO plant can't be ruled out.
 - vi. The industry is not treating whole of the effluent through RO plant and about 2026 KL of effluent was found unaccounted. Hence, the quantities of RO reject will be much more as compare to 658 Kl. as recorded by the industry.
 - vii. The hazardous waste of cat. 33.1 were found scattered here & there and no record was maintained.
 - viii. The industry has not provided proper display board outside the hazardous waste storage room as only a computerized paper is pasted there.
 - ix. The industry has failed to submit any record of bills or documents to justify the regular and periodic maintenance of RO plant. Further, no bill regarding change of membrane or RO plant was produced.
 - x. The industry has not complied with the condition of consent for providing automatic dosing arrangement for optimum chemical / coagulants in its ETP instead of manual system.
 - xi. It has been apprehended that domestic effluent of the industry might be discharged into sewer through toilets.
 - xii. The report of the committee is enclosed as **Annexure-I**
14. That in view of above facts, the appellatant industry was issued notice u/s 33-A of the Water (Prevention and Control of Pollution) Act,1974 as well as show cause notice for revocation of consent to operate under the Water (Prevention and Control of Pollution) Act,1974 and revocation of

32

authorization under the Hazardous and other Waste (Management and Transboundary Movement) Rules, 2016 alongwith notice for imposition of Environmental Compensation with an opportunity of hearing before the Chairman of the Board on 25.04.2024. The hearing on 25.04.2024 before the Chairman of the Board was attended by Sh. Rishi Jethi, Proprietor of M/s Sumit Knit Fab, Ludhiana, who submitted a written reply. The reply was taken on record. He stated that he is sole proprietor of the industry and started the industry in the year of 2019 for washing and dyeing. Before starting the above said unit, got all Permissions/NOC from the Punjab Pollution Control Board as well as all the necessary concerned departments. The proprietor stated that Zero Liquid Discharge Plant has been installed which is working regularly as per norms. In response to the observations of the committee, he further stated that the unaccounted water is used in backwash of UF filter & UF reject water. There is no unmetered water source as only one tube well is installed inside the premises of industry which is metered and record is maintained. Both RO Plants are running and were running at the time of official visit. The visiting team inspected the plant for 4-5 hours. The industry is using total RO product water into process. The industry is involved in washing/dyeing of garments, in which up to 2000 TDS water can be used for process. They are not using RO product water in boiler. There is no such flexible pipe inside industry premises. The industry is treating whole water from ETP in UF and RO Plants. The unaccounted water as per PPCB team, come back into equalization tank from UF Reject and Back wash. The Record of hazardous waste category 33.1 is maintained and sludge is dried in sludge drying trays. Now, the industry has provided the proper display board outside the hazardous waste storage room. The industry has not conducted any major maintenance / membrane replacement. They are providing RO chemical purchase data for regular running of plants. Automatic dosing in dyeing/washing effluent treatment plant is not practically possible. The proprietor further stated that the ETP

-8-

is running satisfactorily as per testing report of various sample collected by PPCB on regular intervals.

The report submitted by the visiting team was deliberated and shortcomings and as well as non-compliances pointed out by team were brought to the notice of proprietor of industry. The proprietor could not explain low efficiency of RO plant and disposal of residue, if any generated from MEE. The proprietor also could not explain as to how the industry can recycle back High TDS RO plant permeate into its process. In nut shell, it was observed that observations of the visiting team are in order and industry is not operating its ZLD plant for which it was granted consent by the Board.

After hearing the proprietor of the industry, officers of the Board and perusing the report given by the committee of officers the Chairman of the Board has taken certain decisions, the relevant of which are mentioned below:

- a) The consent to operate granted to the industry under the Water (Prevention & Control of Pollution) Act, 1974 and authorization granted under the Hazardous and other Waste (Management & Transboundary Movement) Rules, 2016 be revoked.
 - b) The directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 be confirmed for closure of the industry and disconnection of electric connection.
 - c) All the D.G. sets existing in the premises of the industry be sealed.
15. That in compliance of the decisions of hearing dated 25.04.2024, the industry was issued directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 vide Board's letter no 2502-03 dated 29.04.2024 (**Annexure-J**) for its closure and directions were further issued to PSPCL Authorities vide Board's letter no. 2504-05 dated 29.04.2024 (**Annexure-K**) for disconnection of electric supply available with the industry. In compliance of above directions, the PSPCL Authorities had



disconnected the electric supply of the industry vide TDCO letter no. 104/11 dated 29.04.2024. The consent to operate granted to the industry under the Water (Prevention & Control of Pollution) Act, 1974 was also revoked by the Board.

16. That in order to verify the status, the industry was visited by the officer of the Board on 29.04.2024 and the electric connection of the industry was found disconnected in compliance to the directions issued by the Competent Authority of the Board. The D.G set available with the industry was sealed by the officer of the Board in the presence of the representative of the industry.
17. That it is clear from the latest report of the committee of officers that the ZLD system adopted by the industry suffers from various loopholes and major violations have been reported in the functioning of the ZLD system adopted by the industry. It is relevant to mention here that though the request of the industry for temporary restoration of the electric supply was considered by the Board for the period from 2019 to 2020 but considering the fact that the industry was operating the same faulty ZLD system during the said period of operation, the industry cannot escape liability from the imposition of Environmental Compensation for the period of violation from 26.04.2019 to 29.04.2024 on the basis of Polluter Pay's Principle.
18. That the above recorded facts confirm and establish the fact that the appellant has operated the unit without any proper operation of ETP and ZLD system. The discharge of untreated effluent into Buddha Nallah ultimately reaches river Sutlej thereby contaminating the river water which is being used by the public for drinking and bathing purpose. The activities carried out by the appellant unit were illegal in nature and had contributed towards damage to the environment.
19. 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)

A

2

-10-

35CC 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.

20. That facts mentioned and described herein above were sufficient for the imposition of Environmental Compensation by invoking the Principle of Polluter Pays and the industry has thus made itself liable for Environmental Compensation under the Polluter Pay's Principle for the period of violation from 26.04.2019 to 29.04.2024.
21. Thus, in view of the above recorded facts, the matter was considered for imposition of Environmental Compensation for the period of violation from 26.04.2019 to 29.04.2024 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 26.04.2019 to 29.04.2024 (1831 days) was calculated in accordance with the formula evolved by the Central Pollution Control Board. The calculation of Environmental Compensation amounting to Rs. 91,55,000/- is tabulated herein below:

EC	=	PI x N x R x S x LF
PI	=	80 (Since project proponent is violating Water Act, 1974 & Air Act, 1981 and is red category industry)
N	=	1831 (Days calculated w.e.f 26.04.2019 to 29.04.2024 (Date of disconnection of electric supply),
R	=	100 (Since industry is Small Scale Red Category Industry, hence, R factor has been taken as 100),
S	=	0.5 (Since scale is small)
LF	=	1.25 (Since the project proponent is located in city with population less than 1 million)
EC	=	80x1831 x 100 x 0.5 x1.25 = Rs. 91,55,000/-

A copy of order no. 471 dated 05.12.2024 issued by the Board for the imposition of Environmental Compensation upon the appellant is enclosed as **Annexure-L**.

It is, therefore, prayed that the appeal filed by the appellant may kindly be dismissed.

Date: 20/5/2025

Place: Ludhiana

Deponent



(Er. Kanwaldeep Kaur)
Environmental Engineer,
Punjab Pollution Control Board,
Regional Office-1, Ludhiana

(On behalf of Punjab Pollution Control
Board)

VERIFICATION:

Verified that the contents of paragraph 1 to 21 of the above short reply by way of affidavit of the deponent are true and correct to my knowledge as derived from the official record. No part of the above short reply affidavit is false and nothing material has been kept concealed or suppressed therein.

Date: 20/5/2025

Place: Ludhiana

Deponent



(Er. Kanwaldeep Kaur)
Environmental Engineer,
Punjab Pollution Control Board,
Regional Office-1, Ludhiana

(On behalf of Punjab Pollution Control
Board)

A

-12-

7



PUNJAB POLLUTION CONTROL BOARD
Regional Office-I, E-648-B, Phase-5, Focal Point, Ludhiana.
DETAILS OF BE SUPPLIED FOR THE COLLECTION OF SAMPLE
PART-A

1. Name & Address of the industry *M/s Sumit Knit FAB
B-3 Industrial Area-A
Ludhiana.*
2. Raw material used *Cotton & Poliated fabric*
3. i. Product *Semi Finished (Fabric)*
- ii. Processes involved *Raw fabric → washing → Dying (As per requirem
drawing → Finishing → tussler (Pressing)*
4. i. Give the name of the processes in operation at the time of sampling *All in operation*
- ii. The number of wastewater streams from different processes along with discharge of each. *Mixed stream leading to main sewer*
5. i. Quantity of industrial effluent discharge per hour (in liters)/m³/day. *No measuring device found*
- ii. Is the discharge of industrial effluent continuous on intermittent and it intermittent, date & time of its discharges *Un treated effluent into sewer*
- iii. Is the quantity and quality of industrial effluent from different streams uniform through out or not. *Non uniform*
- iv. Present method of disposal of industrial effluent. *Into sewer*
6. i. Working hours *Single shift (8 hours)*
- ii. Closed day *Sunday*
7. Number of outlets through which industrial effluent is discharged/carried outside the industry. *Only one*
8. Name of the occupants/representative of the industry with designation present at the time of sampling. *Sh. Rishi Jethi (owner)
98723-00533*
9. Process not working at the time of sampling & why? *Knitting & Finishing close*
10. Parameters to be analyzed. Parameters
11. Sample preserved for (tick)
 - i. Organic parameter (freezer below 4°C) *S1 → NH, TDS, BOD TSS*
 - ii. Metals (pH less than 2 with HNO₃) *S2 → COD*
 - iii. Cyanide (pH above 10 with NaOH) *S3 → oils & grease*
 - iv. Oil & grease (separate 1 LL. sample glass bottles & freeze) *S4 → Phenolic compounds*
 - v. Others *S5 → sulphides
S6 → Amm. N
S7 → SAR
S8 → T.C.O*

-13- *Fou* *Recep A/L* *2-11*

Punjab Pollution Control Board
 Zonal Laboratory, E-648-B, 2nd Floor, ਸੀ.ਸੀ.ਸਰਕਾਰ/ਸੂਚੀ.ਸਰਕਾਰ/ਸਟੇਸ਼ਨ
 Phase-5, Focal Point, Ludhiana. ਆ. ਵਾਤਾ. ਇੰਜੀ-1,2,3,4

Water Analysis Report

1. Laboratory Sample no.	E-823/Zonal Lab /2018
2. Name of Industry :	M/s Sumit Knit Fab, ਡਾਇਰੀ ਨੰ:..... B-3, Industrial Area-A, ਡਾਇਰੀ: 15/1/19 Ludhiana.
3. Name of Sample Collecting Officer :	Er. A.K.Kalsi, Senior Environmental Engineer, Er. Om Parkash, Environmental Engineer Er. Jatinder Kumar, Asstt. Environmental Engineer
4. Designation of Officer Authorizing Test:	Environmental Engineer, RO-III, Ludhiana
5. Type of Sample :	Grab
6. Date & Time of Sample Collection :	03.01.2019 02.15 pm
7. Date of Receiving/Commencement	03.01.2019
8. Date of Completion	07.01.2019
9. Point of Sample Collection	Final outlet leading to main sewer
10. Test Methods	As per relevant parts of IS:3025 & Methods of APHA

Results:

Sr. No.	Parameters	Final outlet leading to main sewer
1	pH	6.64 ✓
2	Total Suspended Solids (mg/l)	129 ✓
3	Total Dissolved Solids (mg/l)	1277
4	Chemical Oxygen Demand (mg/l)	384
5	Bio-chemical Oxygen Demand (mg/l)	122
6	Oil & Grease (mg/l)	8.0 ✓
7	Phenolic Compound (mg/l)	BDL
8	Ammonical Nitrogen (mg/l)	BDL
9	Sodium Absorption Ratio	4.97 ✓
10	Total Chrome (mg/l)	BDL
11	Sulphide (mg/l)	BDL

BDL means Below Method Detection Limit.

Sample Analysed By

Signature
9/1/19
Asstt. Scientific Officer,
(Incharge, Zonal Lab)

Dated 10/1/2019

Ends. No. 2166

A copy of the above is forwarded to the following for information and necessary action please along with data sheet.

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

Signature
9/1/19
Asstt. Scientific Officer

-14-

4

Restoration/Directions



PUNJAB POLLUTION CONTROL BOARD

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

Tele Fax:- 0161-2672280 Website:- www.ppcb.gov.in email:- ppcbzo1ldh@gmail.com

No. Speed post/Regd. Dated
 To M/s Sumit Knit Fab, 155
 B-3, Industrial Area-A, 20/11/19
 Ludhiana 20/11/19

Sub: **Directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988.**

Whereas, it is mandatory on the part of industry to obtain the 'consent to operate' of the Board to operate an outlet as required under the provisions of the Water (Prevention & Control of Pollution) Act, 1974 for discharge of effluent from its industrial premises.

And whereas, it is also mandatory on the part of the industry to provide adequate & appropriate effluent treatment facilities to bring down the concentration of various pollutants in its effluent within the permissible limits prescribed by the Board.

And whereas, the Hon'ble Supreme Court of India, New Delhi, while considering CWP No. 375 of 2012 titled as Paryavaran Suraksha Samiti and Others Versus Union of India and Ors has passed its order dated 22.02.2017 that:

1. All the industries are required to setup ETP/CETP/STP and make them functional within the prescribed time limit of 3 months.
2. The State Pollution Control Board's are required to carry out inspection to ensure the compliance of the directions of the Hon'ble Supreme Court of India.
3. The industrial units, which have not been able to make their ETPs fully operational within the notice period shall be restrained from any further industrial activity.
4. The Punjab Pollution Control Board should initiate the Civil/Criminal action against the defaulting industries.

And whereas, the industry is operating its outlet in violations of the provisions of Water (Prevention & Control of Pollution) Act, 1974, Thus, causing pollution in intentionally & deliberately.

And whereas, the Punjab Pollution Control Board in compliance to the above said orders passed by Hon'ble Supreme Court of India, New Delhi, has given Public notice through a common advertisement in various newspapers on 17.03.2017 and subsequently final notice on 18.05.2017 to apprise the industries about the order passed by the Apex Court of India. A time of 3 months was given through the said notice to make the effluent treatment plant fully functional i.e. by 21.05.2017.

And whereas, in compliance to the aforesaid orders, the Industry was visited by the officer of the Board on 03.01.2019 and following observation were made:-

1. The industry has installed 6 no. washing cum dyeing machines, 6 no. Tubuler, 2 no. hydro machines, 1 no. Ozone machine & 2 no. tanks for simple washing of fabrics, 2 no. knitting machine (not in operation) and 2 no. raising machine not in operation.
2. The industry was in operation during visit and untreated effluent was being discharged into sewer. During visit, the untreated effluent sample was collected from the final out leading to sewer and the effluent sample was sent to Zonal Lab, Ludhiana for analysis.
3. The representative of the industry told that earlier they are doing fabric processing by raising and tubular only. Thereafter the process of washing and dyeing was added and the ETP was provided for the treatment of the effluent generated from washing and dyeing process.
4. The representative of the industry told that they have restarted the unit after Diwali.
5. The industry has installed 1 no. wood fired boiler of capacity 600 kg/hr equipped with stack of height about 35ft from ground level without sampling arrangement.
6. The industry has installed ETP but the physical condition shows that it has not been operated since long.
7. The industry has installed 1 no. DG set of capacity 62 KVA which is without canopy.

10

-15-

8. No sludge of ETP was found stored inside the premises.
9. The industry could not show the record of consent to operate of the Board under Water (Prevention & Control of Pollution) Act, 1974 & Air (Prevention & Control of Pollution) Act, 1981.
10. The representative of the industry was advised to make the ETP of operation immediately and apply for consent to operate of the Board as required under Water (Prevention & Control of Pollution) Act, 1974 & Air (Prevention & Control of Pollution) Act, 1981.

And whereas, the matter was considered by the Competent Authority the Board and decided to issue directions for closure of the unit as the industry has failed to comply with the provisions of Water (Prevention & Control of Pollution) Act, 1974 and causing water pollution in the vicinity.

Now, therefore, the Chairman of the Board, in exercise of the power conferred upon it, u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 amended in 1988, having been fully satisfied that it is a fit case to order the closure of the industry and hereby directs as under:-

1. That the industry will dismantle and remove all outlets and stop forthwith discharging its trade effluent into Sewer or drain or through any other mode.
2. That the industry will not restart any process unless all necessary water pollution control measures are taken and concentration of various pollutants in its treated trade effluent conforms to the effluent standards laid down by the Board for such discharges.
3. That the industry will not restart discharging effluent until it obtains the consent of the Board u/s 25/26 of the Water (Prevention & control of Pollution) Act, 1974 amended in 1988.
4. That Punjab State Power Corporation Limited (PSPCL) authorities is directed to disconnect the supply of electricity available to the industry.

In case of failure to comply with the above said directions, you are liable for action u/s 41 of the Water (Prevention and Control of Pollution) Act 1974 amended in 1988.

Endst. No.

635

A copy of the above is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-1, Ludhiana for information and submit compliance of the directions within 07 days.

Sd/
Senior Environmental Engineer
For & on behalf of Chairman
Dated 28/7/78

25/11/78
Senior Environmental Engineer
For & on behalf of Chairman

23

- 16 -

Restoration/Directio

 PUNJAB POLLUTION CONTROL BOARD Zonal Office-1, E-648-B, Phase-V, Focal Point, Ludhiana Tele Fax:- 0161-2672280 Website:- www.ppcb.gov.in email:- ppcbzo1ldh@gmail.com		
---	--	--

No.	Speed post/Regd.	Dated
To		ਸੀਨੀ.ਸਹਾ./ਚੁਨੀ.ਸਹਾ./ਸਟੇਸ਼ਨ ਵਾਤਾ.ਦਿੱਲੀ-1,2,3,4
	M/s Sumit Knit Fab, B-3, Industrial Area-A, Ludhiana	ਨਵੀਂ ਡਾਕ 15y ਭਾਇਰੀ ਨੰ: 211/19 ਮਿਤੀ: 21/1/19 ਵਾਤਾ. ਦਿੱਲੀ.
Sub:-	Directions u/s 31-A of Air (Prevention & Control of Pollution) Act, 1981 as amended in 1987.	

Whereas, it is mandatory on the part of the industry to obtain the consent to establish/operate of the Board to operate its industrial plant u/s 21 of Air (Prevention & Control of Pollution) Act 1981 for discharging of emissions from its industrial premises.

And whereas, it is mandatory on the part of industry to provide adequate and appropriate pollution control devices to bring down the concentration of various pollutants in its emission including noise level within the permissible limits prescribed by the Board.

And whereas, the Hon'ble Supreme Court of India, New Delhi, while considering CWP No. 375 of 2012 titled as Paryavaran Suraksha Samiti and Others Versus Union of India and Ors has passed its order dated 22.02.2017 that:

1. All the industries are required to setup ETP/CETP/STP and make them functional within the prescribed time limit of 3 months.
2. The State Pollution Control Board's are required to carry out inspection to ensure the compliance of the directions of the Hon'ble Supreme Court of India.
3. The industrial units, which have not been able to make their ETPs fully operational within the notice period shall be restrained from any further industrial activity.
4. The Punjab Pollution Control Board should initiate the Civil/Criminal action against the defaulting industries.

And whereas, the industry is operating its outlet in violations of the provisions of Water (Prevention & Control of Pollution) Act, 1974, Thus, causing pollution in intentionally & deliberately.

And whereas, the Punjab Pollution Control Board in compliance to the above said orders passed by Hon'ble Supreme Court of India, New Delhi, has given Public notice through a common advertisement in various newspapers on 17.03.2017 and subsequently final notice on 18.05.2017 to apprise the industries about the order passed by the Apex Court of India. A time of 3 months was given through the said notice to make the effluent treatment plant fully functional i.e. by 21.05.2017.

And whereas, in compliance to the aforesaid orders, the Industry was visited by the officer of the Board on 03.01.2019 and following observation were made:-

1. The industry has installed 6 no. washing cum dyeing machines, 6 no. Tubuler, 2 no. hydro machines, 1 no. Ozone machine & 2 no. tanks for simple washing of fabrics, 2 no. knitting machine (not in operation) and 2 no. raising machine not in operation.
2. The industry was in operation during visit and untreated effluent was being discharged into sewer. During visit, the untreated effluent sample was collected from the final out leading to sewer and the effluent sample was sent to Zonal Lab, Ludhiana for analysis.
3. The representative of the industry told that earlier they are doing fabric processing by raising and tubular only. Thereafter the process of washing and dyeing was added and the ETP was provided for the treatment of the effluent generated from washing and dyeing process.
4. The representative of the industry told that they have restarted the unit after Diwali.

5. The industry has installed 1 no. wood fired boiler of capacity 600 kg/hr equipped with stack of height about 35ft from ground level without sampling arrangement.
6. The industry has installed ETP but the physical condition shows that it has not been operated since long.
7. The industry has installed 1 no. DG set of capacity 62 KVA which is without canopy.
8. No sludge of ETP was found stored inside the premises.
9. The industry could not show the record of consent to operate of the Board under Water (Prevention & Control of Pollution) Act, 1974 & Air (Prevention & Control of Pollution) Act, 1981.
10. The representative of the industry was advised to make the ETP of operation immediately and apply for consent to operate of the Board as required under Water (Prevention & Control of Pollution) Act, 1974 & Air (Prevention & Control of Pollution) Act, 1981.

And whereas, the matter was considered by the Competent Authority of the Board and decided to issue directions for closure of the unit as the industry has failed to comply with the provisions of Air (Prevention & Control of Pollution) Act, 1981 and causing air pollution in the vicinity.

Now, therefore, the Chairman of Punjab Pollution Control Board, in exercise of the powers conferred upon it, u/s 31-A of the Air (Prevention & Control of Pollution) Act, 1981 as amended in 1987, having been fully satisfied that it is a fit case to order the closure of the industry and hereby, directs as under:-

1. That the industry shall stop operating all outlets & stop forthwith discharging any emissions from its industrial premises into atmosphere.
2. That the industry shall not restart any process/plant unless all necessary air pollution control measures including noise are taken and concentration of various pollutants conforms to the emissions/noise level standards laid down by the Board.
3. That the industry shall not restart discharging pollutants until it obtains the consent to operate of the Board u/s 21 of Air (Prevention & Control of Pollution) Act, 1981 as amended in 1987.
4. PSPCL, authority is directed to disconnect the electric connection of the industry with immediate effect.

In case of failure to comply with the above said directions, you are liable for action u/s 37 of the Air (Prevention & Control of Pollution) Act 1981 as amended in 1987.

Endst. No. 637

A copy of the above is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-1, Ludhiana for information and submit the compliance of the directions within 7 days.

Sd
Senior Environmental Engineer
For & on behalf of Chairman

Dated 28-7-8

25/11/9
Senior Environmental Engineer
For & on behalf of Chairman
25-11

- 18 -



PUNJAB POLLUTION CONTROL BOARD

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

Tele Fax:- 0161-2672280

Website:- www.ppcb.gov.in

email:- ppcbzo1dh@gmail.com

No.
To

Speed Post

Dated

1. The Chief Engineer (Operation),
Punjab State Power Corporation Ltd.,
Ludhiana.

ਸੀ. ਐਂ. ਓ. / ਮੁੱਖੀ, ਪ੍ਰਦਾ. ਕਮਿਸ਼ਨ
ਪੰਜਾ. ਰਾਜ, ਲੁਧਿਆਣਾ-141004

2. The Superintending Engineer (Distribution),
Punjab State Power Corporation Ltd.,
Ludhiana.

ਡਾਇਰੀ ਨੰ. 153
ਮਿਤੀ: 30/1/19

ਡਾ. ਹਿੰਸੇ
5/1

Subject: Directions u/s 33-A of Water (Prevention & Control of Pollution) Act, 1974 & u/s 31-A of Air (Prevention & Control of Pollution) Act, 1981 to M/s Sumit Knit Fab, B-3, Industrial Area-A, Ludhiana

The Competent Authority of Board has decided to issue direction u/s 33-A of Water (Prevention & Control of Pollution) Act, 1974 & Air (Prevention & Control of Pollution) Act, 1981 for disconnection of electric connection available to the industry/premises with immediate effect. You are, therefore, directed to comply with the following direction:-

"That the authorities concerned shall disconnect the supply of electricity available to the subject cited industry/ premises with immediate effect."

Endst No.

640

Senior Environmental Engineer
For & on behalf of Chairman
Dated 28-1-19

A copy of the above is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-1, Ludhiana for information and submitting compliance report, within 07 days.

Senior Environmental Engineer
For & on behalf of Chairman
Dated 25-1-19

Endst No.

A copy of the above is forwarded to M/s Sumit Knit Fab, B-3, Industrial Area-A, Ludhiana for information.

Senior Environmental Engineer
For & on behalf of Chairman

-19-

113

H.R.
2022/4/19

to

The Environmental Engineer,
Panjab Pollution Control Board,
Regional Office, Ludhiana.

Sub:- Directions u/s 31-A of Air Act, 1981 & Directions u/s 33-A u/s Water Act, 1974. *& restoration of Electric Connection.*

Respected Sir,

Parawise clarification is as under:

1. That the industry has already applied for consent to operate to Regional Office as desired.
2. That the PSPCI. disconnected the power load on 13.02.19 vide no. 51443 (copy attached).
3. That the industry has now installed new ETP consisting of
 - a. 3 No. collections Tank (Batch Treatment).
 - b. Chemical Dosing Tanks with reaction channel.
 - c. Primary Tube Settler
 - d. Biological Tank
 - e. Secondary Tube Settler
 - f. Pre-filtration Tank
 - g. Sand Filter & Carbon Filter
 - h. Parameter Display panel /
 - i. Flow Meter /

-20-

115

*Summit Knit Fab*

4. That the industry has provided port hole with ladder to collect air emission samples.

5. That the industry has installed canopy at DG set as desired.

Now the industry has resubmitted the consents and has also complied with the discrepancies. It is requested to kindly restore the electric connection and issue us the consents.

Hope my request will be considered.

Thanking you.

Yours faithfully,

-21-

197

File



PUNJAB POLLUTION CONTROL BOARD

Zonal Office-1, Ludhiana

Website:- www.ppcb.gov.in

Dispatch No : Registered/Speed Post Date:

Industry Registration ID: R19LDH3616701 Application No : 9836666

Rishi Jethi
3-B, Indl. Area A Extn., Ghore Wali Road,
Ludhiana, Punjab-141010

Grant of 'Consent to Operate' an outlet u/s 25/26 of Water (Prevention & Control of Pollution) Act, 1974 for discharge of effluent.

With reference to your application for obtaining 'Consent to Operate' an outlet for discharge of the effluent u/s 25/26 of Water (Prevention & Control of Pollution) Act, 1974, you are, hereby, authorized to operate an industrial unit for discharge of the effluent(s) arising out of your premises subject to the Terms and Conditions as mentioned in this Certificate.

Particulars of Consent to Operate under Water Act, 1974 granted to the industry

Consent to Operate Certificate No.	CTOW/Fresh/LDHI/2019/9836666
Date of issue :	13/05/2019
Date of expiry :	12/11/2019
Certificate Type :	Fresh

Particulars of the Industry

Name & Designation of the Applicant	RISHI JETHI, (Proprietor)
Address of Industrial premises	Sumit knit fab, 3-b, indl. area a extn., ghore wali road,, Ludhiana east, Ludhiana i-141010
Capital Investment of the Industry	84.61 lakhs
Category of Industry	Red
Type of Industry	1040-Yarn / Textile processing involving any effluent/emission generating processes including bleaching, dyeing, printing and coloring
Scale of the Industry	Small
Office District	Ludhiana i
Consent Fee Details	Rs. 7200/- vide R no. 14/4779 dated 01.02.2019 as NOC Regularization fee Rs. 36000/- vide R no. 12/4779 dated 01.02.2019 under Water Act, 1974. Rs. 36000/- vide R no. 13/4779 dated 01.02.2019 under Air Act, 1981. Adequate up to 30.06.2023

"This is computer generated document from OCMMS by PPCB"

Sumit knit fab, 3-b, indl. area a extn., ghore wali road,, Ludhiana east, Ludhiana i, 1410

Page

198

-22-

Raw Materials(Name with quantity per day)	GARMENT FOR WASHING/DYEING @3000Numbers/Day DETERGENT/SOAP @15Kgs/day DYES & CHEMICALS @10Kgs/day
Products (Name with quantity per day)	WASHING/DYEING OF GARMENTS @3000Numbers
By-Products, if any,(Name with quantity per day)	Nil
Details of the machinery and processes	As per application form
Details of the Effluent Treatment Plant	Trade Effluent @75.0 KLD Domestic Effluent @0.7 KLD
Mode of Disposal	INTO SEWER AFTER ETP INTO SEWER AFTER SEPTIC TANK
Standards to be achieved under Water(Prevention & Control of Pollution) Act, 1974	As prescribed by the Board



13/05/2019

(Ravinder Bhatti)
Environmental Engineer

For & on behalf

of

(Punjab Pollution Control Board)

Endst. No.:

2572

Dated:

13-5-2

A copy of the above is forwarded to the following for information and necessary action please:
The Environmental Engineer, Pb. Pollution Control Board, Regional Office-1, Ludhiana.



13/05/2019

(Ravinder Bhatti)
Environmental Engineer

For & on behalf

of

(Punjab Pollution Control Board)

"This is computer generated document from OCMMS by PPCB"

Sumit knit fab, 3-b, indl. area u extn., ghore wali road, Ludhiana east, Ludhiana

-23-

191

PUNJAB POLLUTION CONTROL BOARD
Zonal office-1, Ludhiana
Website:- www.ppcb.gov.in

File

Dispatch No : _____ Registered/Speed Post _____ Date: _____
 Registration ID: R19LDH3616701 Application No : 9835498

RISHI JETHI
3-B. Indl. Area A Extn., Ghore Wali Road,
Ludhiana, Punjab-141010

Grant of 'Consent to Operate' u/s 21 of Air (Prevention & Control of Pollution) Act, 1981 for discharge of emissions arising out of premises.

With reference to your application for obtaining 'Consent to Operate' u/s 21 of Air (Prevention & Control of Pollution) Act, 1981, you are hereby, authorized to operate an industrial unit for discharge of the emission(s) arising out of your premises subject to the Terms and Conditions as mentioned in this Certificate.

Particulars of Consent to Operate under Air Act, 1981 granted to the industry

Consent to Operate Certificate No.	CTOA/Fresh/LDH1/2019/9835498
Date of issue :	13/05/2019
Date of expiry :	12/11/2019
Certificate Type :	Fresh

Particulars of the Industry

Name & Designation of the Applicant	RISHI JETHI, (Proprietor)
Address of Industrial premises	Sumit knit fab, 3-b, incl. area a extn., ghore wali road., Ludhiana east, Ludhiana i-141010
Capital Investment of the Industry	84.61 lakhs
Category of Industry	Red
Type of Industry	1040-Yarn / Textile processing involving any effluent/emission generating processes including bleaching, dyeing, printing and coloring
Scale of the Industry	Small
Office District	Ludhiana i
Consent Fee Details	Rs. 36000/- vide R no. 13/4779 dated 01.02.2019 under Air Act, 1981.

"This is computer generated document from OCMMS by PPCB"

Sumit knit fab, 3-b, incl. area a extn., ghore wali road., Ludhiana east, Ludhiana i, 141010

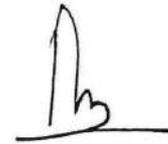
Page.

192

-24-

1

Raw Materials (Name with Quantity per day)	Garment for Washing/Dyeing @ 3000 nos./day, Detergent/Soap @ 15 Kgs/day, Dyes & Chemical @ 10 Kgs/day
Products (Name with Quantity per day)	Washing/Dyeing of garments @ 3000 No./day
By-products, if any, (Name with Quantity per day)	Nil
Details of the machinery and process	As per application form
Quantity of fuel required (in TPD) and capacity of boilers/ Furnace/Thermo heater etc.	Wood @ 1.2 Kg/day for baby boiler HSD @ 20 ltr/day for DG set
Type of Air Pollution Control Devices to be installed	NR
Stack height provided with each boiler/thermo heater/Furnace etc.	15 meter above roof level for baby boiler 3 meter above roof level for DG set
Sources of emissions and type of pollutants	1 no wood fired baby boiler 1 no DG set 62 KVA Capacity
Standards to be achieved under Air(Prevention & Control of Pollution) Act, 1981	As prescribed by the Board



13/05/2019

(Ravinder Bhatti)
Environmental Engineer

For & on behalf

of

(Punjab Pollution Control Board)

Endst. No.:

2574

Dated: 13/5/20

A copy of the above is forwarded to the following for information and necessary action please:
The Environmental Engineer, Pb. Pollution Control Board, Regional Office-1, Ludhiana.



13/05/2019

(Ravinder Bhatti)
Environmental Engineer

For & on behalf

of

(Punjab Pollution Control Board)

"This is computer generated document from OCMMS by PPCB"

Sunil kaur fab, 3-b, indl. area a estn., ghore wali road, Ludhiana east, Ludhiana

- 25 -

316



PUNJAB POLLUTION CONTROL BOARD

Zonal Office-I, E-648-B, Focal Point, Phase-5, Ludhiana

Website:- www.ppcb.gov.in

File #
J

Dispatch No :

Registered/Speed Post

Date

Registration ID: R19LDH3616701

Application No : 11669161

Rishi Jethi
3-b, Indl. Area A Extn., Ghore Wali Road,
Ludhiana, Punjab-141010

Renewal of consent to operate granted vide no. CTOW/Fresh/LDH1/2019/9836666 dated 13.05.2019 valid upto 12.11.2019 under Water (Prevention & Control of Pollution) Act, 1974.

Particulars of Consent to Operate under Water Act, 1974 granted to the industry

Consent to Operate Certificate No.	CTOW/Renewal/LDH1/2020/11669161
Date of issue :	03/03/2020
Date of expiry :	12/05/2020
Certificate Type :	Renewal
Previous CTO No. & Validity :	CTOW/Fresh/LDH1/2019/9836666 From: 13/05/2019 To: 12/11/2019

Particulars of the Industry

Name & Designation of the Applicant	Rishi Jethi. (Proprietor)
Address of Industrial premises	Sumit Knit Fab, 3-b, Indl. Area A Extn., Ghore Wali Road., Ludhiana East, Ludhiana 1-141010
Capital Investment of the Industry	97.32 lakhs
Category of Industry	Red
Type of Industry	1040-Yarn / Textile processing involving any effluent/emission generating processes including bleaching, dyeing, printing and coloring
Scale of the Industry	Small
District	Ludhiana I

This is computer generated document from OCMMS by PPCB

Sumit Knit Fab, 3-b, Indl. Area A Extn., Ghore Wali Road., Ludhiana East, Ludhiana 1, 141010

Page 1

317

-26-

Specific Conditions:

- i. The industry shall install & commission the ZLD as per undertaking given by it.
- ii. The industry shall apply for revised consent to operate after commissioning of the ZLD within a week.
- iii. The industry shall be bound to comply with the directions of the competent authority regarding installation/up gradation of existing treatment facility time to time.

All the other contents and conditions of consent will remain same as mentioned in original consent no. TOW/Fresh/LDH1/2019/9836666 dated 13.05.2019 valid upto 12.11.2019 granted under Water (Prevention & Control of Pollution) Act, 1974.



03/03/2020

(Om Parkash)
Environmental Engineer

For & on behalf

of

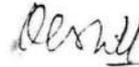
(Punjab Pollution Control Board)

Endst. No.: 786

Dated: 4/3/20

A copy of the above is forwarded to the following for information and necessary action please:

Environmental Engineer, Punjab Pollution Control Board, Regional Office-I, Ludhiana. He is requested to ensure the compliance of the consent conditions.



03/03/2020

(Om Parkash)
Environmental Engineer

For & on behalf

of

(Punjab Pollution Control Board)



-22-

H10

PUNJAB POLLUTION CONTROL BOARD

Zonal Office-I, E-648-B, Focal Point, Phase-5, Ludhiana

Website:- www.ppcb.gov.in

Dispatch No :

Registered/Speed Post

Date: 22/11/2019

Registration ID: R19LDH3616701

Application No: 11669148

Rishi Jethi
3-b, Indl. Area A Extn., Ghore Wali Road,
Ludhiana, Punjab-141010

Renewal of consent to operate granted vide no. CTOA/Fresh/LDH1/2019/9835498 dated 13.2019 valid upto 12.11.2019 under Air (Prevention & Control of Pollution) Act, 1981.

Particulars of Consent to Operate under Air Act, 1981 granted to the industry

Consent to Operate Certificate No.	CTOA/Renewal/LDH1/2020/11669148
Date of issue :	03/03/2020
Date of expiry :	12/05/2020
Certificate Type :	Renewal
Previous CTO No. & Validity :	CTOA/Fresh/LDH1/2019/9835498 From: 13/05/2019 To: 12/11/2019

Particulars of the Industry

Name & Designation of the Applicant	Rishi Jethi, (Proprietor)
Address of Industrial premises	Sumit Knit Fab, 3-b, Indl. Area A Extn., Ghore Wali i Ludhiana East, Ludhiana I-141010
Capital Investment of the Industry	97.32 lakhs
Category of Industry	Red
Type of Industry	1040-Yarn / Textile processing involy effluent/emission generating proces,uding bleaching, dyeing, printing and coloring
Scale of the Industry	Small
Office District	Ludhiana I

This is computer generated document from OCMMS by PPC

Sumit Knit Fab, 3-b, Indl. Area A Extn., Ghore Wali, Ludhiana East, Ludhiana I, 141010

Page 1

012

-28-

Specific Conditions:

1. The industry shall not use any fuel except wood @ 1.2 Ton/day in its baby boiler for burning purpose.
 2. The industry shall get the stack emission monitoring of boiler within one month from the Board lab
- All the other contents and conditions of consent will remain same as mentioned in original consent no. CTOA/Fresh/LDH1/2019/9835498 dated 13.05.2019 valid upto 12.11.2019 granted under Air (Prevention & Control of Pollution) Act, 1981.

Om Parkash

03/03/2020

(Om Parkash)
Environmental Engineer

For & on behalf

of

(Punjab Pollution Control Board)

Dated: 4/3/20

Endst. No.: 798

A copy of the above is forwarded to the following for information and necessary action please:
Environmental Engineer, Punjab Pollution Control Board, Regional Office-1, Ludhiana. He is requested to collect the emission sample of the industry within one month.

Om Parkash

03/03/2020

(Om Parkash)
Environmental Engineer

For & on behalf

of

(Punjab Pollution Control B

-29-

Visit of M/s Sumit Knit Fab, B-3, Industrial Area-A, Ludhiana**BACKGROUND**Constitution of Committee

Sh. S.L. Verma had made a complaint against the subject cited industry for violating the provision of the Environmental laws. The Competent Authority constituted team of the following officers to verify the contents of the complaint and to report in the matter:

1. Er. R.K Ratra, SEE, PPCB, Zonal Office, Jalandhar
2. Er. Arun Kumar Kakkar, Retd SEE, PPCB, Zonal Office, Jalandhar
3. Sh. Sandeep Gupta, Scientific Officer, PPCB, Zonal Lab, Jalandhar

It was also decided that one AEE outside the Ludhiana Area of Jurisdiction may also be included in the team. Accordingly, Er. Jaspal Singh, AEE, Regional office Sangrur was associated in the team.

Consents Status

The industry was granted consents under Water Act vide no. CTOA/Renewal/LDH1/2021/16446028 on 25.08.2021 and under Air Act vide no. CTOA/Renewal/LDH1/2021/16446028 on 25.08.2021 both valid upto 30.06.2025. These consents were granted with following special conditions:

1. The industry shall properly operate its ETP followed by ZLD system and shall not discharge any trade effluent (treated or untreated) into sewer.
2. The consent is subject to review in light of any report received from Excise and Taxation Department and Municipal Corporation, Ludhiana regarding commissioning of the unit and Board will be at liberty to take suitable action against the industry.
3. The industry will provide proper arrangements to dry its ETP sludge before packing in bags for storage, such arrangements must include to avoid rain water into it i.e in drying area.
4. The industry will submit report form ETP supplier for the optimum quantity of chemical/ coagulants used for treatment in its ETP as well as operational manual of the same.
5. The industry will provide the automatic dosing arrangement for optimum chemical/coagulants in its ETP instead of manual system.
6. The industry shall submit monthly data on power consumption in the industry, production, power consumption in ETP, sludge produced, fresh water consumption trade effluent generation and coagulants used/ consumed.
7. The industry shall submit monthly data on consumption of power for operation of APCD, chemicals consumption in APCD if any, ash produced and its disposal.

[Handwritten signature]

[Handwritten signature]
[Handwritten signature]

-30-

8. The industry will make the agreement with the brick kilns for disposal of its boiler ash for use in brick making.
9. These special conditions shall be complied with by the industry within one month.

Authorization Status

The industry was granted authorization under HWM Rules vide no. HWM/renew/LDH₁/2023/16731343 on 23.01.2023 valid upto 30.06.2027 for Schedule 5.1 @0.35KL/ Annum, Schedule 33.1 @1600 no./annum and for 35.3 @3 T/annum respectively.

Report/Observations of the Team:

The team constituted by the Board inspected the industry on 02.02.2024 surprisingly and observed as under:

1. The industry was in operation and only washing process was being done during the visit. Sh. Moti Lal, Supervisor was available during the visit. Despite request made through Sh. Moti Lal, the owner of the industry, Sh. Rishi Jethi did not turn up and associated with the team during the visit.
2. The industry has installed garment washing machines, garment finishing/polishing machine, tumblers and 02 dip dyeing tubs. It has also provided wood fired boiler. However, the representative failed to intimate the capacity of the boiler. Perusal of the record revealed that the consent to the industry is granted for wood fired baby boiler.
3. The industry has installed effluent treatment system comprising of conventional physio-chemical treatment [Equalization-cum-chemical mixing and reaction tank along with chemical dosing tanks, primary tube settler, aeration tank, secondary tube settler, filtration unit (Sand and Activated Carbon Filter)] followed by tertiary treatment [Ultra-filtration, 2 Stage RO (reverse osmosis) and evaporator]. In addition, sludge drying bed, sludge filter press is also provided. During the visit ETP as well as RO plant were in operation. At the time of entry, evaporator was not in operation.
4. The industry has provided following meters and readings of the same during visit were:

I. At Submersible pump:	No display observed
II. At outlet of ETP (Conventional Treatment):	59339.465 KL
III. At RO-I and RO-II permeate leading to re-use feed tank:	570.5 KL
IV. At RO Reject Outlet leading to evaporator:	2042.603 KL
5. The industry has maintained the day-to-day record of the above said flow meters and as per record the details for the period from 01/01/2023 to 01/02/2024 is as under:

Fresh Water Intake:

Water Reading as on 01.01.23:	2369 KL
Reading as on 01.02.24:	4032 KL
Total Consumption:	1663 KL




Hulkabikas



- 31 -

ETP Outlet:

Outlet reading as on 01.01.23: 48664 KL
 Outlet reading as on 01.02.24: 59320 KL
 Total Discharge ETP Outlet: 10656 KL

RO Permeate:

Outlet reading as on 01.01.23: 450 KL
 Outlet reading as on 21.12.23: 7864 KL (Meter Changed)
7414 KL

New Reading as on 22.12.23: 0 KL (after replacement of meter)

Reading as on 01.02.24: 558 KL
 Total RO permeate: 7972 KL

RO Reject:

Outlet reading as on 01.01.23: 1384 KL
 Outlet reading as on 01.02.24: 2042 KL
 Total RO Reject: 658 KL

Summary of fresh water consumption, effluent treated, RO permeate and RO reject during the period 01.01.2023 to 01.02.2024 is worked out and tabulated below:

Fresh Water Intake	ETP Outlet Discharge	RO Processing			Difference between ETP discharge and RO processing
		Permeate	Reject	Total	
1663 KL	10656 KL	7972 KL (75%)	658 KL (6%)	8630 KL (80%)	2026 KL (20%)

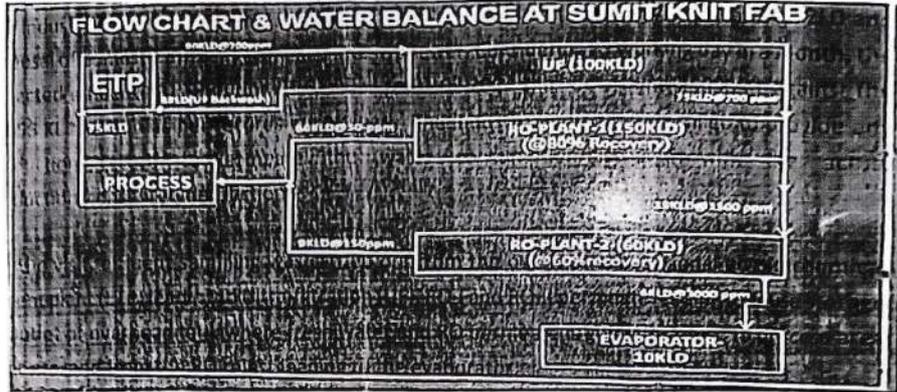
From the perusal of above, it is revealed that

- A) Total effluent received after the conventional treatment at RO plant was 10656 KL. Whereas, the effluent processed through RO plant was 8630 KL. There is no account of 2026 KL of effluent. This effluent may either be directly disposed off after the ETP plant to MC sewer without evaporation to save the cost of energy involved in evaporation.
- B) Further, the data analysis revealed that during said period, total RO permeate generated in 7972 KL and fresh water intake was 1663 KL. Therefore, maximum water available for processing activities including boiler intake was $7972+1663=9635$ KL. However, the effluent discharge from ETP during this period was 10656 KL i.e. 1021 KL more than the water available. Interestingly, the fresh water was also to be used for boiler feed and domestic purposes. Further, there will be evaporation losses during washing, dyeing and drying process. Thus, there is possibility of unmetered water source from where the water is taken for processing activities but is not accounted in records.

Qd *Ci* *Aulakar*
[Signature] *[Signature]* *[Signature]*

- 32 -

c) As per the flow chart exhibited at site, 92% RO permeate was expected against 75% permeate received as per records maintained. Then, rest of the 25% should be the RO reject. Whereas, as per the records, only 6% RO reject was there. It means, rest of the effluent was directly discharged without RO treatment/evaporation.



D) The industry is granted consent for treatment and reuse effluent at the @75 KLD through ZLD and disposal of domestic effluent @0.7 KLD into MC sewer. Considering 25 working day in a month, the expected effluent at ETP during 01.01.2023 to 01.02.2024 shall be around 25000 KL against the 10656 KL received as per records maintained. The industry representative failed to provide any production record to compare the water consumption/discharge with the actual production/consented production.

6. During the visit, effluent sampling was carried out from the outlet of conventional physio-chemical treatment plant (ETP) leading to Ultra-filtration (UF), RO-I and RO-II permeate leading to reuse storage tank, Outlet of overhead tank where fresh water and RO permeate is going for reuse to process area & boiler etc. and from the RO reject leading to the evaporator.

As per analysis report received from Head Office Lab, Patiala the parameters are reproduced as below:

Parameters (mg/l except pH & SAR)	Outlet of ETP leading to UF Feed	RO-I & RO-II permeate leading to reuse storage tank	Outlet of overhead tank where Fresh Water+ RO Permeate leading to reuse	RO Reject leading to Evaporator
pH	7.8	8.2	8.3	8.2
TSS	18	BDL	11	44
TDS	1640	1501	1267	5894
COD	52	19	14	-

Handwritten signatures and initials: A.C. Alankar

-33-

BOD	8	BDL	BDL	
SAR	16.8	14.6	11.5	
Ammn. Nitrogen	4.3	BDL	BDL	
Phenolic Compound	BDL	BDL	BDL	
Sulphide	BDL	BDL	BDL	
Total Chrome	BDL	BDL	BDL	
O & G	BDL	BDL	BDL	

From the perusal of the analysis report, it is observed that

- (A) TDS of treated effluent after conventional ETP is 1640 mg/l and TDS of final RO permeate is 1501 mg/l. Thus, the efficiency of RO plant to treat TDS parameter stands at 8.5% only, reflecting that RO is not functioning properly and efficiently and there are chances industry might be discharging its treated effluent without reusing in the process.
- (B) Further, TDS of fresh water+ RO permeate which is stated to be reused for boiler, washing/dyeing process is 1267 ppm. As per the flow chart displayed at site, the ZLD plant is design for RO permeate of 50 ppm TDS. Even, TDS of fresh water checked during visit was around 500 mg/l. It is neither feasible nor advisable to use treated effluent with such a high TDS of around 1300 ppm for boiler feed or for dyeing/washing process as it will affect the boiler infrastructure as well as affect the quality of product being manufactured by the industry.
7. During visit, no bypass was found. However, considering the position explained above, possibility of discharge of effluent through flexible pipe from ETP or RO plant can't be ruled out.
8. The evaporator was not in operation when the team entered the industry. To check its operational status and efficiency, the representative was requested to operate the evaporator. He informed that to operate the evaporator at full capacity, he has to close the supply of steam from other processes. Thereafter, he diverted the steam from the processing area and started the evaporator. During 01 hour and 30 minutes, 300 ltr of RO reject was evaporated. Hence, the evaporator has operational capacity of about 200 lt/hr. As per the record maintained by the industry, total RO reject generated from 01.01.2023 to 01.02.2024 was 658 KL, which is equivalent to 2 KLD of RO reject. Hence, in case, this evaporator would be operated for 10 hrs, it can evaporate about 2000 ltr of RO reject. For that industry has to divert whole of the steam of boiler to the evaporator by stopping other processes. However, the records also suggest that, the industry is not treating whole of the effluent through RO plant and about 2026 KL of effluent was found unaccounted. Hence, the quantities of RO reject will be much more as compare to 658 KL as recorded by the industry. Thus, the industry is required to provide a dedicated boiler for evaporator in addition to the existing boiler against the expected quantities of RO reject/consented discharge.

Adil Kulkarni

-34-

9. Hazardous waste storage arrangements of the Industry were examined and observed that
- A) The industry was granted authorization for category no. 5.1, 33.1 and 35.3 of hazardous waste. However, the hazardous waste of category no. 5.1 and 33.1 were not found stored in the dedicated room provided for hazardous waste.
 - B) The hazardous waste of category no. 33.1 (discarded containers) were found scattered here & there and no record was maintained.
 - C) The hazardous waste of category 35.3 (ETP Sludge) was lying stored in hazardous waste storage room with danger sign marked on the bag. 14 no. bags of ETP sludge of appx 20 kg each were lying in the Room. Whereas, 20 bags were found stored outside the sludge storage room, near ETP area. As per record maintained by the industry, 27 bags are stored, but it was not matching with the actual sludge stored at site as detailed above. Some quantity of ETP sludge was also found lying in MS Pan for drying in working shed exposed to the workers of factory. This drying pan was in rusted condition, having big holes in the side walls.
 - D) The industry has not provided proper display board outside the hazardous waste storage room as only a computerized paper is pasted there.
10. Representative of industry informed that the effluent treatment plant was installed in year 2019 and second phase was completed in 2020. However, he failed to submit any record of bills or documents to justify the regular and periodic maintenance of RO plant. Further, no bill regarding change of membrane or RO plant was produced by the representative during visit.
11. The industry has not complied with the condition of consent for providing automatic dosing arrangement for optimum chemical/coagulants in its ETP instead of manual system.

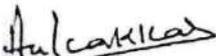
Conclusions:

- > The analysis results as well as records maintained by industry reflects that the ZLD system is not providing desirable results.
- > The capacity of evaporator is not adequate.
- > The hazardous waste storage arrangements are not satisfactory.

Note: Photographs taken during the visit are attached as Annexure-I



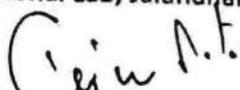
(Nishpal Singh)
SE RO, Sangrur



(Anil Kumar Kakkar)
d SEE, PPCB



(Sandeep Gupta)
SO, Zonal Lab, Jalandhar



(R.K. Ratra)
SEE, ZO, Jalandhar

-35-



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

No. 2502-

Speed post/Regd.

Date 20/11/2024

To

M's Sumit Knit Fab,
B-3, Industrial Area-A, Extension,
Ludhiana.

Sub: Directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 for closure of the industry.

Whereas, it is mandatory on the part of industry to obtain consent to operate of the Board to operate an outlet u/s 25/26 of the Water (Prevention & Control of Pollution) Act, 1974 for discharge of effluent from its industrial premises.

And whereas, it is also mandatory on the part of industry to install proper and adequate pollution control devices/ facilities so that the concentration of various pollutants discharged by it conforms to the effluent standards prescribed by the Board.

And whereas, the industry is a small scale red category unit engaged in the process of dyeing and washing of the garments.

And whereas, a complaint was earlier received against the unit through Head Office, Patiala regarding illegal operation of the unit. To verify the facts the site of unit was visited by Senior Officers of the Board on 03.01.2019 and it was found that the industry was operating without consent of the Board. The industry had installed the ETP but untreated effluent was being discharged into sewer. The ETP was found not in operational condition. The effluent samples were collected and as per analysis report, various parameters were found beyond the prescribed limits of the Board [BOD-122 against 30 mg/l, TSS- 129 against 100 mg/l, COD-384 against 250 mg/l].

And whereas, due to above violation, the direction u/s 33-A & 31-A were issued to the PSPCL vide letter no. 538-641 dated 02.08.2019 for electric disconnection of unit. In compliance, the electric connection was disconnected by the PSPCL authorities.

And whereas, the industry had applied 'Consent to Operate' and for restoration of electric connection of the unit.

And whereas, in light of 'Consent to Operate' applied by the unit, the short time 'Consent to Operate' was granted under Water Act, 1974 vide no. CTOW/Fresh/LDH1/2019/9836666 dated 13.05.2019 valid upto 12.11.2019 for trade effluent discharge @ 75 KLD into sewer after treatment through ETP & Air Act, 1981 vide no. CTOA/Fresh/LDH1/2019/9835498 dated 13.05.2019 valid upto 12.11.2019 & electric connection of the industry was also restored temporarily upto 12.11.2019 for six months to adjudge the adequacy of installed ETP by the industry.

And whereas, the industry on 05.11.2019 again applied for renewal of 'Consent to Operate' alongwith restoration of electric connection for further period.

And whereas, the industry was granted consent under Water Act, 1974 & Air Act, 1981 both valid upto 12.05.2020 & electric connection of the industry was also restored upto 12.05.2020.

And whereas, the electric connection was disconnected by PSPCL vide TDCO no. 171/85668 dated 21.05.2020 due to expiry of temporarily restoration period.

And whereas, the industry again applied for renewal in validity of consent under Water (Prevention & Control of Pollution) Act, 1974 and Air (Prevention & Control of Pollution) Act, 1981 alongwith restoration of electric connection.

And whereas, the industry was visited by officer of the Board on 01.06.2020 and observed that the industry had now installed UF & RO plant and is recycling approx. 50 % of water after UF-RO and is discharging about 35 KLD of waste water into sewer. The electric connection of the industry is lying disconnected from the Pole. (TDCO no. 65668 dated 12.05.2020).

And whereas, in light of the UF & RO system installed by the industry the 'Consent to Operate' under Water Act, 1974 & Air Act, 1981 was granted to the industry on 24.07.2020 upto 23.01.2021 for recycling of 50 % UF and RO water and Discharge remain 35 KLD into sewer as one RO was pending due to Covid/curfew. The electric connection of the unit was also restored temporarily upto 23.01.2021.

And whereas, the industry on 27.12.2020 had again applied for extension in the validity of Consent to operate under the Water Act, 1974 and Air Act, 1981. alongwith restoration of electric connection.

And whereas, a complaint was also received from office of Monitoring Committee constituted by Hon'ble NGT letter no. CMC/2020/981 dated 20.08.2020 for detailed enquiry in the matter and to submit action taken report within 21 days.

-36-

And whereas, a team of the officers of the Board was also constituted by the Competent authority for inspection of unit. The industry was visited by team of officers of the Board on 28.10.2020 and it was observed as under:

1. The industry has installed 6 no. washing machines, 2 no. tub dyeing machines, 5 no. electric dryer, 2 no. knitting machines and 3 no. tuning machines.
2. The industry has installed ETP followed by RO system for treatment of trade effluent.
3. The representative of the industry informed during visit that earlier they were doing knitting, raising, tabling and fuse, printing, etc. since 2004 alongwith boiler. Tub dyeing is used as per demand & in case of fault during washing, cold dyeing is also done in washing milling machines.
4. During visit, Sh. Rishi Jethi, Proprietor could not produce the old records, bills & any justification regarding bills dated 14.08.2007 and 18.08.2007 for sweater O/D washing (Over Dyeing washing) attached with the complaint.

And whereas, the complainant had attached the copy of documents related to sale tax department regarding sale & purchase of the unit and permission of MCL. Therefore, the letter was issued to MCL vide letter no. 163 dated 11.01.2021 and to Assistant Excise and Taxation Commissioner, Excise and Taxation Department, Ludhiana vide letter no. 165 dated 11.01.2021 to intimate the date & year from which the industry is doing dyeing/washing process.

And whereas, the industry was also issued SCN to submit its reply vide Board letter no. 713-14 dated 18.02.2021 on the points of complaint.

And whereas, the industry has submitted the reply of SON but report was awaited from Assistant Excise & MCL. Hence in view of ZLD system installed by the industry short time 'Consent to Operate' under the Water Act, 1974 & Air Act, 1981 dated 03.03.2021 upto 02.09.2021 for Zero Liquid Discharge and electric connection of the unit was also restored upto this period 02.09.2021 with special conditions that-

- a) The industry shall get the EMF meters installed at source of water supply as well as on recirculation system, within 15 days.
- b) The industry shall submit the copies of balance sheets alongwith copies of electricity bills from date of commissioning of the unit.

And whereas, a new complaint has been received from Sh. Sunil Verma, Prop of M/s Megaline Enterprises, D-282, Focal Point, Phase-8, Ludhiana. The complainant is also engaged in the same work and business as the industry in question.

And whereas, without complete report of Excise & Sale Tax Department and without complete bill of all dyeing/ washing machinery, the exact date of start of Dyeing/washing unit by the industry cannot be adjudged.

And whereas, the industry was granted consent to operate under the Water Act, 1974 valid upto 30.6.2025 for Zero Liquid Discharge (ZLD).

And whereas, the industry was granted authorization under the Hazardous and other Waste Rules, 2016 valid upto 30.06.2027 for hazardous waste of category 5.1, 33.1 & 35.3.

And whereas, Sh. SL Verma has filed a complaint against M/s Sumit knit fab through Sh. Sant Balbir Singh Sicheval MP and a committee is constituted by competent authority of the Board to enquiry in the matter. The committee has submitted the report and raised some observation as per below:-

1. There is no account of 2023 KL. Whereas, the effluent may either be directly disposed off after the ETP plant to MC sewer without evaporation to save cost of energy involved in evaporation.
2. There is possibility of unmetered water source from where the water is taken for processing activities but is not accounted in records.
3. RO is not functioning properly and efficiently and there are chances that the industry might be discharging its treated effluent without reusing in the process.
4. It is neither feasible nor advisable to use treated effluent with such a high TDS of around 1300 ppm for boiler feed or for dyeing/washing process as it will affect the boiler infrastructure as well as affect the quality of product being manufactured by the industry.
5. The possibility of discharge of effluent through flexible pipe from ETP or RO plant can't be ruled out.
6. The industry is not treating whole of the effluent through RO plant and about 2026 KL of effluent was found unaccounted. Hence, the quantities of RO reject will be much more as compare to 658 KL as recorded by the industry.
7. The hazardous waste of cat. 33.1 were found scattered here & there and no record was maintained.
8. The industry has not provided proper display board outside the hazardous waste storage room as only a computerized paper is pasted there.
9. The industry has failed to submit any record of bills or documents to justify the regular and periodic maintenance of RO plant. Further, no bill regarding change of membrane or RO plant was produced.
10. The industry has not complied with the condition of consent for providing automatic dosing arrangement for optimum chemical / coagulants in its ETP instead of manual system.

-32-

It has been apprehended that domestic effluent of the industry might be discharged into sewer through toilets.

And whereas, the industry is not complying with the conditions of consent to operate granted to industry under Water Act, 1974, and authorization granted under the Hazardous and other Waste Rules, 2016.

And whereas, the industry was issued notice u/s 33-A of the Water Act, 1974 as well as show cause notice for revocation of consent to operate under the Water Act, 1974 and revocation of authorization under the Hazardous and other Waste Rules, 2016 alongwith notice for imposition of EC with hearing before Chairman of the Board on 25.04.2024, wherein it was decided as under:

1. The consent to operate granted to the industry under the Water (Prevention & Control of Pollution) Act, 1974 and authorization granted under the Hazardous and other Waste (Management & Transboundary Movement) Rules, 2016 be revoked.
2. The directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 be confirmed for closure of the industry and disconnection of electric connection.
3. All the D.G. sets existing in the premises of the industry be sealed.
4. A reminder be issued to MCL in continuation to letter no. 163 dated 11.01.2021 and to Assistant Excise and Taxation Commissioner, Excise and Taxation Department, Ludhiana in continuation to letter no. 165 dated 11.01.2021 to intimate the date & year from which the industry is doing dyeing/washing process.
5. The amount of Environmental Compensation be calculated after receipt of reply from MCL and Excise and Taxation Department, Ludhiana.
6. The Environmental Engineer, Regional Office-1, Ludhiana shall verify the year wise installation / addition of machinery by the industry and pursue the matter with MCL and Excise and Taxation Department for early response.

And whereas, the proceedings of personal hearing held before the Chairman of the Board on 25.04.2024 has been conveyed to the industry.

And whereas, the consent to operate granted to the industry under the Water (Prevention & Control of Pollution) Act, 1974 has been revoked.

Now, therefore, the Chairman of the Board, in exercise of the powers conferred upon it, u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 as amended in 1988, having been fully satisfied that it is a fit case to order the closure of the industry and hereby directs as under:-

1. That the industry will dismantle and remove all outlets and stop forthwith discharging its trade effluent into sewer or drain or through any other mode.
2. That the industry will not restart any process unless all necessary water pollution control measures are taken and concentration of various pollutants in its treated trade effluent conforms to the effluent standards laid down by the Board for such discharges.
3. That the industry will not restart discharging effluent until it obtains the consent of the Board u/s 25/26 of the Water (Prevention & control of Pollution) Act, 1974 as amended in 1988.
4. That Punjab State Power Corporation Limited (PSPCL) authority is directed to disconnect the supply of electricity available to the industry.

In case of failure to comply with the above said directions, you are liable for action u/s 41 of the Water (Prevention and Control of Pollution) Act 1974 as amended in 1988.

Luiz 29/4
Senior Environmental Engineer
For & On behalf of Chairman of the Board

Endst. No.

A copy of the above is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-1, Ludhiana for information and to submit compliance of the directions. It is requested to seal all the D.G. sets existing in the premises of the industry.

Senior Environmental Engineer
For & On behalf of Chairman of the Board

-38-

	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
---	---

No. 2504
To

Regd./Speed Post

Date 29/4/24

1. The Chief Engineer (Operation),
Punjab State Power Corporation Ltd.,
Ludhiana.
2. The Superintending Engineer (Distribution),
Punjab State Power Corporation Ltd.,
Ludhiana.

Subject: Directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974- M/s Sumit Knit Fab, B-3, Industrial Area-A, Extension, Ludhiana.

The Competent Authority of Board has decided to issue directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 for disconnection of electric connection available to the industry/ premises, with immediate effect. You are, therefore, directed to comply with the following:-

"That the authorities concerned shall disconnect the supply of electricity available to the subject cited industry/premises with immediate effect."

In case of failure to comply with the above said directions, you are liable for action u/s 41 of the Water (Prevention & Control of Pollution) Act, 1974.


 Senior Environmental Engineer
 For & On behalf of Chairman of the Board
 Dated 29/4/24

Endst No.

A copy of the above is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-1, Ludhiana for information and to submit compliance report, within 03 days. It is requested to seal all the D.G. sets existing in the premises of the industry.


 Senior Environmental Engineer
 For & On behalf of Chairman of the Board
 Dated

Endst No.

A copy of the above is forwarded to M/s Sumit Knit Fab, B-3, Industrial Area-A, Extension, Ludhiana for information.


 Senior Environmental Engineer
 For & On behalf of Chairman of the Board

-39-



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

No. 2505

Regd./Speed Post

Date 29/4/24

To

1. The Chief Engineer (Operation),
Punjab State Power Corporation Ltd.,
Ludhiana.
2. The Superintending Engineer (Distribution),
Punjab State Power Corporation Ltd.,
Ludhiana.

Subject: Directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974- M/s Sumit Knit Fab, B-3, Industrial Area-A, Extension, Ludhiana.

The Competent Authority of Board has decided to issue directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 for disconnection of electric connection available to the industry/ premises, with immediate effect. You are, therefore, directed to comply with the following:-

"That the authorities concerned shall disconnect the supply of electricity available to the subject cited industry/premises with immediate effect."

In case of failure to comply with the above said directions, you are liable for action u/s 41 of the Water (Prevention & Control of Pollution) Act, 1974.

June 29/14
Senior Environmental Engineer
For & On behalf of Chairman of the Board

Endst No.

A copy of the above is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office-1, Ludhiana for information and to submit compliance report, within 03 days. It is requested to seal all the D.G. sets existing in the premises of the industry.

Senior Environmental Engineer
For & On behalf of Chairman of the Board
Dated

Endst No.

A copy of the above is forwarded to M/s Sumit Knit Fab, B-3, Industrial Area-A, Extension, Ludhiana for information.

Senior Environmental Engineer
For & On behalf of Chairman of the Board



No. 471.....

-40-

ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਕੰਟਰੋਲ ਬੋਰਡ
PUNJAB POLLUTION CONTROL BOARD

Dated. 5/12/2024

Subject: Imposition of Environmental Compensation upon M/s Sumit Knit Fab, B-3, Industrial Area-A, Extension, 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 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) 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 industry is a small scale red category unit engaged in the process of dyeing and washing of the garments.
- 4) Earlier, a compliant was received against the unit regarding illegal operation of the unit. To verify the facts the site of unit was visited by Senior Officers of the Board on 03.01.2019 and it was found that the industry was operating without consent of the Board. The industry had installed the ETP but untreated effluent was being discharged into sewer. The ETP was found not in operational condition. The effluent samples were collected and as per analysis report, various parameters were found beyond the prescribed limits of the Board [BOD-122 against 30 mg/l, TSS- 129 against 100 mg/l, COD-384 against 250 mg/l].
- 5) Due to above violation, the direction u/s 33-A of the Water Act, 1974 & 31-A of the Air Act, 1981 were issued to the PSPCL vide Board's letter no. 638-641 dated 02.08.2019 for disconnection of the electric connection available with the industry. In compliance of above, the electric connection was disconnected by the PSPCL authorities. Thereafter, the industry had applied 'Consent to Operate' and for restoration of electric connection of the unit.

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@ppcb.org.in | mspcb@gmail.com |

6) In light of 'Consent to Operate' applied by the unit, the short time 'Consent to Operate' was granted under Water Act, 1974 vide no. CTOW/Fresh/LDH1/2019/9836666 dated 13.05.2019 valid upto 12.11.2019 for trade effluent discharge @ 75 KLD into sewer after treatment through ETP & Air Act, 1981 vide no. CTOA/Fresh/LDH1/2019/9835498 dated 13.05.2019 valid upto 12.11.2019 & electric connection of the industry was also restored temporarily upto 12.11.2019 for six months to adjudge the adequacy of installed ETP by the industry.

7) The industry had again applied for renewal of 'Consent to Operate' of the Board on 05.11.2019 alongwith restoration of electric connection for further period. The industry was granted consent under Water Act, 1974 & Air Act, 1981 both valid upto 12.05.2020 & electric connection of the industry was also restored upto 12.05.2020.

8) The electric connection of the industry was disconnected by PSPCL Authorities vide TDCO no. 171/65668 dated 21.05.2020 due to expiry of temporarily restoration period.

9) The industry had again applied for renewal in validity of consent under Water (Prevention & Control of Pollution) Act, 1974 and Air (Prevention & Control of Pollution) Act, 1981 alongwith restoration of electric connection.

10) The industry was visited by officer of the Board on 01.06.2020 and it was observed that the industry had installed UF & RO plant and is recycling approx. 50 % of water after UF-RO and is discharging about 35 KLD of waste water into sewer. The electric connection of the industry is lying disconnected from the Pole.

11) In light of the UF & RO system installed by the industry the 'Consent to Operate' under Water Act, 1974 & Air Act, 1981 was granted to the industry on 24.07.2020, both valid upto 23.01.2021 for recycling of 50 % UF and RO water and discharge remain 35 KLD into sewer as one RO was pending due to Covid/curfew. The electric connection of the unit was also restored temporarily upto 23.01.2021.

12) The industry had again applied for extension in the validity of Consent to operate under the Water Act, 1974 and Air Act, 1981 alongwith restoration of electric connection on 27.12.2020.

13) Meanwhile, a compliant was also received from office of Monitoring Committee constituted by Hon'ble NGT letter no. CMC/2020/981 dated 20.08.2020 for detailed enquiry in the matter and to submit action taken report within 21 days.

14) A team of the officers of the Board was also constituted by the Competent Authority for inspection of unit. The industry was visited by team of officers of the Board on 28.10.2020 and it was observed as under:

1. The industry has installed 6 no. washing machines, 2 no. tub dyeing machines, 5 no. electric dryer, 2 no. knitting machines and 3 no. tuning machines.



2. The industry has installed ETP followed by RO system for treatment of trade effluent.
3. The representative of the industry informed during visit that earlier they were doing knitting, raising, tabling and fuse, printing, etc. since 2004 alongwith boiler. Tub dyeing is used as per demand & in case of fault during washing, cold dyeing is also done in washing milling machines.

15) The complainant had attached the copy of documents related to sale tax department regarding sale & purchase of the unit and permission of Municipal Corporation, Ludhiana. Therefore, the letter was issued to MCL vide letter no. 163 dated 11.01.2021 and to Assistant Excise and Taxation Commissioner, Excise and Taxation Department, Ludhiana vide letter no. 165 dated 11.01.2021 to intimate the date & year from which the industry is doing dyeing/washing process.

16) The industry was also issued show cause notice to submit its reply vide Board letter no. 713-14 dated 18.02.2021 on the points of compliant. The industry has submitted the reply of show cause notice issued to it, but report was awaited from Assistant Excise & MCL. Hence in view of ZLD system installed by the industry short time 'Consent to Operate' under the Water Act, 1974 & Air Act, 1981 dated 03.03.2021 valid upto 02.09.2021 for Zero Liquid Discharge and electric connection of the unit was also restored upto this period 02.09.2021 with special conditions that:-

- a) The industry shall get the EMF meters installed at source of water supply as well as on recirculation system, within 15 days.
- b) The industry shall submit the copies of balance sheets alongwith copies of electricity bills from date of commissioning of the unit.

17) Thereafter, the industry was granted consent to operate under the Water Act, 1974 valid upto 30.6.2025 for Zero Liquid Discharge (ZLD). The industry was granted authorization under the Hazardous and other Waste Rules, 2016, valid upto 30.06.2027 for hazardous waste of category 5.1, 33.1 & 35.3.

18) Sh. SL Verma has filed a complaint against M/s Sumit knit fab through Sh. Sant Balbir Singh Sichewal MP and a committee is constituted by competent authority of the Board to enquiry in the matter. The committee has submitted the report and raised some observation as per below:-

1. There is no account of 2026 KL. Whereas, the effluent may either be directly disposed off after the ETP plant to MC sewer without evaporation to save cost of energy involved in evaporation.
2. There is possibility of unmetered water source from where the water is taken for processing activities but is not accounted in records.
3. RO is not functioning properly and efficiently and there are chances that the industry might be discharging its treated effluent without reusing in the process.

is neither feasible nor advisable to use treated effluent with such a high TDS of around 200 ppm for boiler feed or for dyeing/washing process as it will affect the boiler structure as well as affect the quality of product being manufactured by the industry. The possibility of discharge of effluent through flexible pipe from ETP or RO plant can't be ruled out.

6. The industry is not treating whole of the effluent through RO plant and about 2026 KL of effluent was found unaccounted. Hence, the quantities of RO reject will be much more as compare to 658 KL as recorded by the industry.
7. The hazardous waste of cat. 33.1 were found scattered here & there and no record was maintained.
8. The industry has not provided proper display board outside the hazardous waste storage room as only a computerized paper is pasted there.
9. The industry has failed to submit any record of bills or documents to justify the regular and periodic maintenance of RO plant. Further, no bill regarding change of membrane or RO plant was produced.
10. The industry has not complied with the condition of consent for providing automatic dosing arrangement for optimum chemical / coagulants in its ETP instead of manual system.
11. It has been apprehended that domestic effluent of the industry might be discharged into sewer through toilets.

19) In view of above, the industry was issued notice u/s 33-A of the Water Act, 1974 as well as show cause notice for revocation of consent to operate under the Water Act, 1974 and revocation of authorization under the Hazardous and other Waste Rules, 2016 alongwith notice for imposition of EC with hearing before Chairman of the Board on 25.04.2024, wherein some of the decisions that:-

1. The consent to operate granted to the industry under the Water (Prevention & Control of Pollution) Act, 1974 and authorization granted under the Hazardous and other Waste (Management & Transboundary Movement) Rules, 2016 be revoked.
2. The directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 be confirmed for closure of the industry and disconnection of electric connection.
3. All the D.G. sets existing in the premises of the industry be sealed.
4. A reminder be issued to MCL in continuation to letter no. 163 dated 11.01.2021 and to Assistant Excise and Taxation Commissioner, Excise and Taxation Department, Ludhiana in continuation to letter no. 165 dated 11.01.2021 to intimate the date & year from which the industry is doing dyeing/washing process.
5. The amount of Environmental Compensation be calculated after receipt of reply from MCL and Excise and Taxation Department, Ludhiana.

-44-



6. The Environmental Engineer, Regional Office-1, Ludhiana shall verify the year wise installation / addition of machinery by the industry and pursue the matter with MCL and Excise and Taxation Department for early response.

20) The Excise and Taxation Department, Ludhiana has submitted its report that the unit has made purchases from the firms dealing in dyes and chemicals in the year 2005 and is carrying out the dyeing process. The unit is in the business of dyeing of Garments since, 2005.

21) In compliance of decisions of hearing dated 25.04.2024, the industry was issued directions u/s 33-A of the Water (Prevention & Control of Pollution) Act, 1974 vide Board's letter no. 2502-03 dated 29-04-2024 to its closure and to PSPCL Authorities vide Board's letter no. 2504-05 dated 29-04-2024 for disconnection of electric supply available with the industry. In compliance of above directions, the PSPCL Authorities was disconnect the electric supply of the industry vide TDCO letter no. 104/11 dated 29.04.2024. The consent to operate granted to the industry under the Water (Prevention & Control of Pollution) Act, 1974 was also revoked by the Board..

22) To verify the same, the industry was visited by officer of the Board on 29.04.2024 and it was observed that the electric connection of the industry found disconnected in compliance to the directions issued by the Competent Authority. The process got stopped during the visit & after shutting down the D.G set. The D.G set was sealed by the officer of the Board in the presence of the industry.

23) It is clear from the latest report of the committee that the ZLD system adopted by the industry suffers from various loopholes and major violations have been reported in the functioning of the ZLD system adopted by the industry by the committee. It is also hereby mentioned that though the request of the industry for temporary restoration of the electric supply was considered from the period from 2019 to 2020 however as the industry was operating the same ZLD system in that period also, as such it would be technically as well as legally appropriate to impose EC on the unit from 26.04.2019 to 29.04.2024 on account of violations.

24) 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.

25) Above facts are sufficient for the imposition of Environmental Compensation by invoking the Principle of Polluter Pays and the industry thus made itself liable for Environmental Compensation under the Polluter Pay's Principle for the period of violation from 26.04.2019 to 29.04.2024.

-45-

26) Thus, in view of the above recorded facts, the matter was considered for imposition of Environmental Compensation for the period of violation from 26.04.2019 to 29.04.2024 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 26.04.2019 to 29.04.2024 (1831 days) was calculated to be Rs. 91,55,000/- as per following details:

EC	=	PI x N x R x S x LF
PI	=	80 (Since industry is violating Water Act, 1974 & Air Act, 1981 and is Red category industry)
N	=	1831 (Days calculated w.e.f 26.04.2019 to 29.04.2024 (Date of disconnection of electric supply))
R	=	100 (Since industry is small scale Red category industry, hence, R factor has been taken as 100)
S	=	0.5 (Since scale is small)
LF	=	1.25 (Since the project proponent is located in city with population less than 1 million)
EC	=	80 x 1831 x 100 x 0.5 x 1.25 = Rs. 91,55,000/-

27) Therefore, the industry is hereby directed to deposit an amount of Rs. 91,55,000/- as Environmental compensation for the period of violation from 26.04.2019 to 29.04.2024 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.

28) 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