Item No. 05

BEFORE THE NATIONAL GREEN TRIBUNAL
CENTRAL ZONE BENCH, BHOPAL
(Through Video Conferencing)

Original Application No. 15/2021(CZ)
(I.A. No. 06/2021)

Gaurav Raghuvanshi — Applicant (s)

Versus

Union of India & Ors. — Respondent(s)

Date of hearing: **01.10.2021**

CORAM: HON'BLE MR. JUSTICE SHEO KUMAR SINGH, JUDICIAL MEMBER
HON'BLE DR. ARUN KUMAR VERMA, EXPERT MEMBER

For Applicant(s) : Ms. Nimisha Nayak, Adv.

For Respondent(s) : Mr. Rohit Sharma, Adv.
Ms. Parul Bhdoria, Adv.
Mr. Yadvendra Yadav, Adv.
Mr. Sachin K. Verma, Adv.

ORDER

1. The issues raised are discharge of untreated effluents by Pharmaceutical Formulation unit situated in Sector-2, Pithampur, 'Symbiotech Pharmaceutical Company' where multiple kind of medicines are formulated and prayed to issue direction to the authorities to stop the untreated effluents discharging from the factory of 'Symbiotech Pharmaceutical Company' to Nallahs which are flowing into Angred River of Sagore Village carrying large amount of effluents from adjacent Industries which in turn spoil the water quality of River Angred which is tributary of River Chambal and River Chambal is tributary of River Yamuna which in turn is tributary of Ganga and joins Ganga at Prayagraj, (U.P.), causing unfavorable changes in physiochemical Parameters. Despite protests by people and representation/Complaint made by the Applicant neither the State Government nor State Pollution Control Board, nor the Central Government has taken any action and the polluting industry has been continuously violating the environmental norms by discharging toxic effluents. The print and electronic

media also highlighted the issue of discharge of untreated effluent by reporting and bring it to public domain but not action has been taken by the authorities.

2. The matter was taken up on 21.05.2021 and the Joint committee was constituted with direction to file the factual and action taken report in the following manner:-

> *"8. We deem it just and proper to call a report on the matter in issue in present application, from a Joint Committee consisting of:-*
>
> *(i) District Collector, District Dhar (M.P.)*
>
> *(ii) Central Pollution Control Board, E-5, Link Road No. 3, Ekant Park, Arera Colony, Bhopal*
>
> *(iii) Madhya Pradesh Pollution Control Board*
>
> *9. The Committee is directed to visit the place and submit the factual and action taken report within six weeks. The State PCB will be the nodal agency for coordination and logistic support.*
>
> *10. The report in the matter be filed by the Committee by email at ngtczbbho-mp@gov.in preferably in the form of searchable PDF/OCR Support PDF and not in the form of Image PDF."*

3. In compliance thereof Joint Committee submitted the report which is as follows :-

> *"1. The applicant has raised the issue of discharge of untreated effluents by Bulk Drug manufacturing Unit situated in phase-2, Pithampur, 'Symbiotec Pharmalab Pvt. Ltd.' where multiple kind of Bulk Drugs and APIs are manufactured and prayed to issue direction to the authorities to stop the untreated effluents discharging from the factory.*
>
> *2. To verify the above the committee visited M/s Symbiotec Phamralab Pvt. Ltd. which is located in plot No. 5-8, SEZ, Phase- 2, Sector-3, Industrial area Pithampur, District-Dhar on 11.06.2021. The industry is involved in manufacturing of API (Bulk drug). The technical details related to products, production capacity, water consumption, waste water quantity and treatment plant installed by the industry are submitted here in below:*

S. No.	Particulars	Information	
1	Name of industry /unit and location	M/s Symbiotic Pharmalab Pvt. Ltd., SEZ Phase- 2, Industrial Area Pithampur, District Dhar (M.P.)	
2	Date of Inspection/ Monitoring	11.06.2021	
3	Name of Representative of Industry	• Mr. Sushil Satwvani (Commercial Director). • Mr. Ram Prasad Verma (Site Head and Factory Manager) • Mr. Ramawtar Agrawal (DGM-EHS)	
4	Details of Consent & HWA issued by MPPCB	Consent No. AW 52926, Validity- 28.02.2022 Consent No. AWH 50748, Validity 31.10.2024	
5	Product Name and Quantity (As per consent issued by MPPCB)	**Product Name**	**Capacity**
		A1-Starting material. A2- Hormones A3- Steroids	250 MT/Year 150 MT/Year 100 MT/Year
6	Water Consumption	**As per Consent**	**Actual**
	Boiler Feed Cooling Water Domestic Purpose Manufacturing Process	120 KLD 240 KLD 40 KLD 300 KLD	120 KLD 190 KLD 37 KLD 190 KLD
7	Wastewater generation	**As per Consent**	**Actual**
	Industrial domestic	290 KLD 30 KLD	258 KLD 24 KLD
8	Pollution Control Measures		
a)	Details of ETP for treatment of effluent	Industry has installed ETP (Capacity: 500 KLD) and the ETP consist of Solvent stripper for high COD stream, collection tank, Pre electro-coagulation, Physico- chemical treatment, Two stage biological treatment, Post electro-coagulation, 03 stage RO, Multi effect Membrane Evaporator (MEME), Screw press and paddle dryer.	
b)	Detail of STP for treatment of domestic waste water	Industry has installed STP (Capacity 50 KLD) and the STP consist of Bar rack screen, Oil scopper, Aeration tank, Moving bed bio reactor, Lamella tube settler, Filter feed tank, Activated Carbon filter, Pressure Sand filter Treated water collection tank.	
c)	Source of Air Pollution	**Boiler (03 Nos.)**	

	and arrangements for control of air pollution	*10 ton/Hr.*	*Bag Filter (288 + 60 bags) & stack of 36 meter height*
		6.3 ton/Hr.	*Gas fired & Common stack of 36 meter height*
		2 ton/Hr.	
		DG Set (03 No.)	
		2000 KVA 1010 KVA x 2 Nos.	*Acoustic enclosures & Chimney of required height.*
		Scrubber (22 No.)	*Alkaline media*
9	*Detail of Reverse Osmosis plant (RO Plant)*		
	R.O. Plant	*03 stage RO*	
	Capacity	*400 KLD*	
10	*Detail of Softener plant*		
	Softener plant Capacity	*36 KL/Hr.*	

3. *The industry is located in Special Economic Zone (SEZ) Pithampur. The area of SEZ is surrounded with the boundary was from all the sides and controlled by department of Custom.* The plant and ETP was in operation during the visit on 11.06.2021.
4. *The industry has obtained Consent to Operate (CTO) and Hazardous waste authorization (HWA) from MPPCB which is valid up to 28.02.2022 and 31.10 2024 respectively.*
5. *The water is required mainly in the manufacturing of various products, Boiler feed, Cooling & Washing and Domestic purpose. The main source of water to the unit is the water supply from MPIDC, Pithampur.*
6. *The effluent is generated mainly from manufacturing process, vessel washing, floor washing & softener regeneration etc. The Water Balance Sheet submitted by the unit.*
7. *The industry has installed Effluent treatment Plant (Capacity- 500 KLD) for treatment of industrial effluent based on ZLD. The ETP consists of solvent stripper for high COD stream, collection tank, pre electro-*

coagulation, physicochemical treatment, two stage biological treatment, post electro-coagulation , 03 stage RO (400 KLD), Multi Effect Membrane Evaporator (MEME) – 25 KLD, screw press for sludge, paddle dryer.

8. *The industry has also installed Sewage Treatment Plant (Capacity-50 KLD) in the premises to treat domestic wastewater generated from canteen, wash basins, urinals etc. The treated wastewater from STP is discharged in to the aeration tank of ETP for further treatment along with industrial effluent. The MLSS in the aeration tanks was found adequate. The log books related to ETP, RO, MEME and dryer etc. found maintained.*

9. *The unit has installed flow meter at the inlet of ETP (Make : KROHEN), ETP outlet before RO (Make: Endress-Hauser) and Final outlet at RO permeate (Make : ABB); but there was no connectivity of flow meter to MPPCB and CPCB server was observed during the visit. The logbook record of installed flow meter and ETP for the month of May-2021 is placed.*

10. *The RO permeate is being used in cooling tower and for other ancillary purposes as per conditions given in the consent. While RO reject is directed to install MEME for sludge formation.*

11. *The sludge generated from PST, electro-coagulation and MEME is passed though screw-press and then dried in Paddle dryer. The daily sludge generation of the industry is around 2000 Kg which is sold to nearby Cement manufacturing units in Manawar viz. Ultratech & Jaypee Cement for co-processing. The housekeeping near sludge handling area was found proper. The* details of sludge generation is enclosed.

12. *The industry has also provided in-house laboratory facility for the analysis of operating parameters of ETP. The analysis record for the month of May-2021 is enclosed.*

13. *The industry has installed 01 online PTZ 360 degree movable nights vision camera near ETP area to ensure the ZLD status from the industry and was found*

operational during the visit. The industry has given connectivity of this online camera to the servers of CPCB/MPPCB. The credential for PTZ camera are :

User ID : symbiotic
Password : InDp#5678

14. *The ETP was found operational during the visit of the Committee dated 11.06.2021 and the unit is maintaining ZLD status. The zero liquid discharge observed during inspection. No bypass drain form the unit was observed to discharge untreated effluents outside from the premises. The site location map and Google map of sampling locations is enclosed. The site photographs taken during inspection are enclosed.*

15. *To verify the operational status of the installed ETP, the inspection team had collected the garb samples of untreated and treated wastewater from the Inlet & Outlet of ETP before RO and after RO (i.e. permeate of RO) respectively. The samples were analyzed by Regional Laboratory, MPPCB Indore and the analysis reports are enclosed.*

The analysis report of the samples collected reveals that all the consented parameters of ETP final outlet i.e. RO Permeate are found well within the prescribed limits as pH = 7.17, TSS = 04 mg/L, TDS = 676 mg/L, BOD = 2.2 mg/L, and COD = 23.72mg/L.

16. *The team also visited River Angred near village – Sagore to verify the discharge of pollutions into the river. However, the River was found completely dry and in fact the above river is non-perennial and flow is observed mainly during rains.*

17. *During inspection to check the quality of groundwater and verify any pollution in groundwater, grab samples of ground water were collected from 03 tube wells in the vicinity of the industrial area. The samples were collected and preserved as per standard methods and analysed by MPPCB, Indore Laboratory. The details of the samples collected are given in the Table-1.*

***Table 1 : Details of Ground Water Samples collected from* surrounding area, Pithampur.**

S.N.	Samples details	Location	Depth (in feet)	Co-ordinates
1.	Tube well near Sitlamata Mandir, Village Chhoti Sagore, Pithampur	Near Angred river	250	Lat. 22°36' 14.98" N Lon. 75°36' 08.28"E
2.	Tube well in front of M/s Dabur India Ltd. Pithamur	Near Kheda Pithampur	180	Lat. 22°37' 39.87" N Lon. 75°37' 20.77"E
3.	Hand pump water near Primary School, Bardari, Pithampur	Village Bardari	200	Lat. 22°36' 52.81" N Lon. 75°39' 08.79"E

The analysis results of the above tube wells are enclosed. The analysis reports are conforming to the permissible limits notified in BIS 10550 : 2012.

18. *At the boundary wall of the unit a natural storm water drain was observed which was found completely dry at the time of visit. Also, a low lying area near the boundary wall of the industry was observed. The low lying area was found filled with stagnant water. Sample was taken from the low lying area and analysed for physicochemical parameters to verify and discharge from the industry.*

    The parameters found to be pH=7.41, TSS=18mg/L, TDS = 1861 mg/L, BOD= 22 mg/L and COD =183.92 mg/L. The analysis report is enclosed. Any discharge, into this low lying area/pond has to be separately investigated, in reference to cluster of industries falling in the catchment area of this pond.

19. *On the basis of inspection and above observations it has been found that the said industry M/s Symbiotee Pharmalab Pvt. Ltd. has provided arrangements for treatment of wastewater, Industry is maintaining Zero Liquid Discharge. During inspection the water pollution problem was not observed due to the above industry.*

Recommendation of the Committee :

The inspection team recommends following arrangements

to strengthen the pollution control systems in the visited industry:

i. *As per ZLD norms, the industry shall be directed to provide connectivity of installed flow meters at the intel and outlet of the ETP to CPCB and MPPCB servers.*

ii. *Industry may be directed to install one standby Multi Effect Evaporator of the adequate capacity with ATFD.*

iii. *Industry should install 02 more PTZ Night vision 360 deg. Cameras with connectivity to CPCB/MPPCB in following locations:*

1. *In existing plot, near old ETP to capture the working of ETP and MEME.*
2. *In new plot, to capture the working of screw sludge press and paddle dryer.*

4. Learned counsels for the applicant as well as respondents have argued that the recommendations as submitted by the committee must be observed by the respondents. Accordingly the **Original Application No. 15/2021** is **disposed of** with a direction that the recommendations submitted by the joint committee must be observed and complied with within three months. In-case of any discrepancies or non-compliance the State Pollution Control Board shall proceed in accordance with law.

Sheo Kumar Singh, JM

Arun Kumar Verma, EM

01st October, 2021
O.A. No. 15/2021(CZ)
(I.A. No. 06/2021)
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