

Northern India Textile Mills' Association

PHD House, Sector 31 A, Chandigarh-160 031

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Jul 4, 2019

Capt. Amarinder Singh,
The Hon'ble Chief Minister,
Govt. of Punjab,
Punjab Civil Secretariat, 2nd Floor,
Sector – 01,
Chandigarh.

Subject: New Treated Effluent Discharge Standards prescribed by Punjab Pollution Control Board for Large Dyeing Units operating in Ludhiana City.

Respected Sir,

We, Northern India Textile Mills' Association (NITMA) is an association of Textile Mills located in Northern India and was established in the year 1958. It is registered under Societies Act XX1 of 1860 and is a non-profit body solely engaged in helping promote the interests of Indian Textile Industry not only in the northern part as the name suggests but also in central and western states of the country.

NITMA is serving the interest of textile units for more that five decades. Many of the large, medium and small textile industries located in northern India re associated with NITMA with the combined turnover above Rs. 50,000 Crores and represents approx 20% of textile production capacity.

We wish to seek your kind intervention in the captioned water management related issue concerning the industry in the state of Punjab.

The Punjab Pollution Control Board (PPCB) has issued a notification dated 26th April, 2019 asking all the 14 large Dyeing Units located in Ludhiana to achieve by end Dec'19 the treated effluent discharge parameters which are much more stringent than that prescribed by the Ministry of Environment, Forests & Climate Change(MoEF&CC) for Textile industry as described below:-

Parameter	MoEF&CCNorms	New PPCB Norms
BOD	30 mg/l	10 mg/l
COD	250 mg/l	50 mg/l
TSS	100 mg/l	20 mg/l
Sodium Absorption Ratio	26	7

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This action of PPCB appears to have been triggered out of the recent judgement dated 30th April'2019 of National Green Tribunal (NGT) directing the MoEF& CC to prescribe stringent effluent discharge standards for Sewerage Treatment Plants (STP's) in the Metro as well as Non-Metro cities with an aim to avoid contamination of rivers in the country.

We have all appreciation for the efforts of Govt. to improve the cleanliness level of "BudhaNallah" which is the principal carrier of sewage water in the Ludhiana City feeding the Municipal Corporation run STP's and later merging with the River Sutlej. The three Common Effluent Treatment Plants (CETP's) being set up for the small and medium scale dyeing units of Ludhiana shall certainly ensure proper treatment of Dyeing effluent of this segment which is currently getting mixed in the Sewage water. We are given to understand that these CETP's shall be commissioned over the next 3 to 9 months period.

However, the large Dyeing Units operating in the city fully understanding their responsibility towards environment have already invested heavily in setting up Effluent Treatment Plants at their respective Mill locations. All these Units are consistently operating these ETP's and meeting the treated effluent discharge parameters prescribed by the MoEF&CC.

The current action of the PPCB to prescribe the effluent discharge parameters applicable to STP's for Textile Dyeing Industry is not justified for the reason that the nature of textile dyeing effluent is quite different compared to the sewage water and the newly prescribed parameters are not technically possible to be achieved in the ETP's.

It is therefore, requested to keep the effluent discharge parameters for Textile Dyeing Industry at par with the MoEF& CC levels for the following reasons :-

- a) The new parameters directed by Hon'ble NGT in the judgment dated 30th April'2019 are meant for sewage water treated at STP's and not for the ETP's of Textile Dyeing Industry.
- b) One of the major reasons of the current problem i.e. mixing of untreated effluent of small and medium scale dyeing units in the sewage water shall get addressed with the treatment of this effluent in the new CETP's being set up.
- c) The content of treated effluent of textile dyeing plants is only about 15-20% of the total sewage water generated in the city.
- d) The BOD & COD levels prescribed by MoEF& CC are already quite stringent and continued compliance to the same would not cause deterioration to the overall quality of water fed to the STP's.
- e) It would not be justified to differentiate the large Textile dyeing plants asking them to achieve parameters that are not technically possible to be achieved in the ETP's simply because they are using "BudhhaNaala" as a carrier of the good quality treated effluent.
- f) It would not be desirable to put the textile dyeing units of Ludhiana to disadvantage compared to their competitors located elsewhere.

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- g) The alternative of installing RO and MEE (Zero Liquid Discharge) is not workable for two reasons – first, due to an un-affordable cost of effluent treatment and second, the non-availability of required space in the existing plants.
- h) All the large scale dyeing units are already religiously operating their ETPs and maintaining the discharge parameters laid down by MoEF& CC. PPCB is already monitoring the functioning of these ETP's online.
- i) Any undue pressure to achieve stricter norms which are not technically feasible in the ETPs, and fixing a tight timeline for the same would simply lead to closure of these units and cause a serious setback to the Punjab Govt.'s efforts to increase the pace of industrialization in the State which has greatly suffered over the years.
- j) While the large scale textile dyeing units shall continue their hunt for a viable technology to improve the effluent treatment process, it would be desirable to maintain status quo till the achievement of stricter effluent discharge norms is demonstrated and validated by the three CETP's being set up in the city.

It is therefore, most humbly requested that the subject notification dated 26th May'2019 asking the large scale dyeing industry to achieve prescribed new standards by end Dec'19 be kept in abeyance for the time being.

Thank You.

With kind regards

G. Balasubramanian
Secretary General