



Gujarat Chamber of Commerce & Industry



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29th Sept, 2022

Chairman / Member Secretary

Central Pollution Control Board,
Parivesh Bhawan, East Arjun Nagar,
New Delhi-110032

| 28200

Sub: Views / Suggestions in connection with the Brainstorming Session scheduled on 21.09.2022 at 11:00 with the CETP operating agencies & industrial associations for strengthening the operation and improving the performance of Common Effluent Treatment Plants (CETPs) in the country

Respected Sir,

Greetings from the Gujarat Chamber of Commerce & Industry (GCCI).

Please find attached herewith views/suggestions in connection with the Brainstorming Session scheduled on 21.09.2022 at 11:00 with the CETP operating agencies & industrial associations for strengthening the operation and improving the performance of Common Effluent Treatment Plants (CETPs) in the country as asked.

Please be needful in the matter for better performance of CETPs.

With warm regards,

Dr. Yogendrakumar Trivedi

Secretary General

Copy for information and necessary action:

Chairman / Member Secretary

Gujarat Pollution Control Board.
Paryavaran Bhavan, Gandhinagar.



Gujarat Chamber of commerce and Industry (GCCI)

Views / Suggestions

Point No:1: Existing framework and functioning (O & M) of CETPs.

A. Vapi/Vatva:

Primary treatment is given by individual member. Primary treated effluent is conveyed to CETP through underground pipeline. Further secondary treatment is given by CETP. Regular monitoring is being carried out by CETP of member units for checking inlet effluent quality. This way inlet norms are controlled by CETP.

For high COD/ high TDS effluent, CETP has MEE and Spray dryer.

Point no. 2: Regulatory and monitoring infrastructure

A. As per Standard methods and experts view COD measurement always deviate 10 to 15% of true value and therefore CETPs should not be penalized strictly at just above 250 mg/l. The deviation may also be taken into account specially for CETPs dealing with chemical industries effluents.

B. New method of COD analysis has been adopted and being published by APH Standard Methods for chloride correction and the same may be followed by regulatory authorities.

C. Meeting TDS, TSS, BOD and refractory COD are challenges to CETPs in Gujarat being nature of effluents are predominantly from Chemical, Dye, Pharma and Pesticide sectors with heterogeneity and therefore realistic and techno-economically feasible norms may be fixed to the CETP rather than making them more stringent and impractical.

D. Well defined disciplinary policy has to be prepared and implemented for member units to deal with non-complying units

Point no 3: Primary effluent treatment Plant norms vis-a-vis CETP inlet norms.

- A. CETP should be given inlet norms as per technology adopted by CETP in line with MoEf and CC Notification dtd. 01.01.2016. No tailor-made fix inlet norms should be given to all CETP. SPCB should consult individual CETP operator and fix the inlet norms accordingly.

Point no 4: Advanced / new / relevant technologies for treatment

- A. Wherever there is new technology is being adopted and the results from that technology is beneficiary to the society with a sustainability factor, it should be shared to other CETPs.
- B. CETP technology provider shall be insisted to at least give six-month performance guarantee during which CETP must achieve desired norms. only after that CETP shall be handover to operators. Failing to which CPCB shall make such technology provider published on websites so other operator may keep in mind while replicating same technology.

Point No: 5 R & D requirements

- A. To reduce the TDS in effluent, spray dryers are being used. This generates large quantity of salts. Presently it is being disposed into TSDF site. If research is done in this area and these salts are utilized as resources in any industry, it will be beneficiary to industries as well as to Environment.

Point No 6: Any other challenges /issues to be addressed for the effective compliance of CETPs.

- A. Where the CETP is able to get untreated sewage, then it has to be permitted by SPCB to treat untreated sewage with industrial effluent for getting more efficiency in biological treatment. This will minimize the use of spray dryer coal and electrical power, which ultimately decrease global warming.
- B. As per EPA -1986, the State Government should provide notified land for the Common Environment facility. Our request is to provide land in notified area for common Environment facilities like CETP & TSDF site to avoid Public consultation, as several projects are held up because of



public agitation even though it is technically approved by SPCB & MOEF. Hon. Supreme court has directed in the same line to provide such facilities in their judgement given by them in year 2017.

- C. As per CPCB direction to SPCB, CETP& R-17 Category industries have to install OCEMS on their outlet from the vendors specified by CPCB and all have complied the same. Every fifteen /thirty-minute effluent discharge quality data is being transmitted to CPCB/SPCB E- platform and whenever there is discharge not complying the norms, there is an “alert” messages are being sent by CPCB to the concern CETP/industry.

Unfortunately, whenever there is a legal matter, CPCB/SPCB/NGO is showing results of the manual sampling instead of OCEMS. This data is arbitrary and not transparent practice.

When the manual sample data is not matching the OCEMS data, then we strongly advocate that appropriate weightage shall be given to OCEMS data, as there could be a mistake in manual samples data.

The OCEMS are being validated time and again and same is validated by only and only by SPCB.

Point No: 7 Suggesting the way forward

A. Deep Sea discharge:

As most of CETP of Gujarat State are meeting with deep sea discharge norms, we strongly request for deep sea discharge through pipe line for disposal of treated effluent of CETPs, as TDS norms are very difficult to meet without RO followed evaporation which leads to high air pollution and energy consumption. where ever possible deep-sea pipeline shall be insisted by CPCB so that TDS may be disposed off safely.

This will help in survival of thousands of Dyes and Dyes intermediate, chemicals, Pharmaceuticals, Pesticides, Textile Industries giving employment to crore of people and huge exchequer to state and central Government.



This will lead to reduction in Global warming through reduction in usage of huge amount of fossil fuel, electricity and chemicals. This will also reduce water pollution in River, water bodies and unnecessary litigation.

- B. As huge amount of power is consumed in CETP for treatment of effluent, we suggest lower tariff rate of power for CETPs. This will be helpful in adopting new advance technology for upgrading existing CETPs.
- C. Earlier Central Government was giving subsidy to CETPs. Now no subsidy is given by Central Government. We request to give subsidy by Central Government for new CETPs as well as for existing CETPs adopting new advanced technology. This will help to upgrade CETPs and will help in maintaining Environment and ecology.
- D. Government should give financial assistance to the CETP willing to treat and reuse sewage after treatment for industrial purposes. This will not only improve the quality of water bodies in which sewage is discharged, but also conserve the precious fresh water.
- E. EDC amount collected from CETP and its member units may be use for R&D work and for up gradation work of CETP of particular area.
- F. CPCB may held regular interaction meeting with CETP operators at regular interval.

As our Hon'ble Prime Minister's dream is to bring ease of doing business and also its our duty to reduce imports from our neighboring countries, above all points are of vital importance by which we can fulfil the dream of Hon'ble Prime Minister to create Atmanirbhar Bharat also any of above recommendations is not increasing the pollution but it is suggested for transparent compliance or both regulatory Authorities and Industries.