WHEREAS, Calcutta Leather Complex Tanners’ Association (hereinafter referred to as CLCTA) is responsible for operation and maintenance of the CETP, Effluent Transportation network, CCRU situated at the Calcutta Leather Complex, Bantala, P.O.- Bhojerhat, Dist.- South 24 Parganas, Pin – 743 502.

AND WHEREAS, regular inspection of the leather complex is carried out by the officials of the West Bengal Pollution Control Board (hereinafter referred to as the Board). It was observed during inspection on 28.11.2017 that overflow of waste water generated from the tanneries was taking place at various locations causing contamination of the storm water canal within the complex. Moreover, leakage in discharge line of the pump at EPS 2 was causing continuous mixing of wastewater into the storm water canal instead of final treatment in the CETP. Highly obnoxious smell was felt in the areas and the storm water canal has become almost a pool of untreated effluent where such contamination was taking place.

AND WHEREAS, the online monitoring system installed by CLCTA for the CETP was not functioning. Out of the four modules, only three (3) modules were in operation on the day of inspection. As per theoretical calculation, total effluent generation load from 326 tanneries which were granted Consent to Operate is 19.99 MLD. It is quite clear that a major portion of effluent generated from the tanneries does not reach the CETP due to such occurrences.

Consent to Operate of the CETP is valid upto 30/09/2021.

Hazardous Waste handling status :

- Has submitted Annual Return for 2016-17.
- The unit is disposing CETP sludge to the CHWTSDF regularly and manifest copies are being submitted.
- Inspection has been conducted on 10/11/2017. During the inspection, CETP sludge was found stored below the filter press. There are dedicated sludge storage pits but these are not being used.
- Spillage of waste was observed beyond the filter press shed and on the adjoining road.

Analysis report of Effluent collected from common outlet of CETP for the period from January, 2017 to November, 2017

<table>
<thead>
<tr>
<th>Sl. No.</th>
<th>Month</th>
<th>Results</th>
<th>Permissible standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>November, 2017</td>
<td>Complied</td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td>October, 2017</td>
<td>Non-complied in respect of Sulphide (1.22 mg/L)</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td>September, 2017</td>
<td>Complied</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td>August, 2017</td>
<td>Complied</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td>July, 2017</td>
<td>Non-complied in respect of Sulphide (60.46 mg/L)</td>
<td>1 mg/L</td>
</tr>
<tr>
<td>6.</td>
<td>June, 2017</td>
<td>Non-complied in respect of S²⁻ (66.15 mg/L)</td>
<td></td>
</tr>
<tr>
<td>7.</td>
<td>May, 2017</td>
<td>Non-complied in respect of S²⁻ (52.97 mg/L)</td>
<td></td>
</tr>
<tr>
<td>8.</td>
<td>April, 2017</td>
<td>Non-complied in respect of S²⁻ (11.26 mg/L)</td>
<td></td>
</tr>
<tr>
<td>9.</td>
<td>March, 2017</td>
<td>Non-complied in respect of S²⁻ (28.51 mg/L)</td>
<td></td>
</tr>
<tr>
<td>10.</td>
<td>February, 2017</td>
<td>Non-complied in respect of S²⁻ (9.69 mg/L)</td>
<td></td>
</tr>
</tbody>
</table>
AND WHEREAS, a hearing of CLCTA was arranged on 08/02/2018 by the Board for the above mentioned non-compliances.

AND WHEREAS, the representatives of M/s. Calcutta Leather Complex Tanners’ Association appeared in the hearing and submitted the following:-

- At present all the four modules are operating properly. Various works for environmental upgradation of the Leather Complex is being undertaken.
- New blowers for the aeration tanks have been purchased and installed in order to improve their efficiency and to comply with the effluent discharge standard.
- CLCTA has resolved the problem at EPS 2 and no discharge of effluent to storm water canal from this EPS is taking place any more. They will construct additional well at all EPSs to avoid overflow of effluent into storm water canal.
- Cleaning of effluent transportation line will be started shortly and they will submit the detailed programme to the Board.
- They agreed to pay all statutory charges/fees to the Board. Annual Return for 2016-17 as per HW Rules has been submitted.
- General Secretary, CLCTA assured that overall improvement of CETP area including EPSs will be done within 1st week of May,2018.

Representatives of CLCTA also informed that few tanneries are reportedly carrying out excess production by installing additional equipments resulting in generation of additional quantity of effluent. They requested the Board to look into this aspect.

NOW THEREFORE, considering the submission, Calcutta Leather Complex Tanners’ Association is hereby directed as follows:

1. CLCTA shall always operate the CETP efficiently so as to meet the effluent discharge standards. New effluent discharge standard for CETP as notified by MoEF & CC, Govt.of India vide no. S.O. 4(E) dated 01.01.2016 shall be complied with.

2. They shall prepare module-wise annual maintenance plan for the CETP and submit the same to the Board within 15 days.

3. They shall take positive steps to stop discharge of untreated effluent into the storm water canals on an urgent basis. They should keep strict vigil on the member units which discharge effluent to storm water canal and inform the Board.

4. CLCTA shall identify and provide the list of the tanneries which are carrying out excess production by installing additional equipments for taking necessary action against such units by the Board.

5. They shall start cleaning of effluent transportation line in phases as early as possible and submit the detailed programme in this regard to the Board within 15 days. They shall also submit EPS wise zone distribution of tanneries.

6. Sludge generated from the CETP shall be disposed to TSDF on regular basis. CLCTA shall also ensure proper and safe disposal of sludge generated from individual tanneries.

7. They shall henceforth pay all statutory charges/fees as claimed by the Board.

8. They shall initiate necessary action for operation of the on-line effluent monitoring system of the CETP and also for net connectivity by BSNL or other service providers towards transmission of data to server on urgent basis and submit the progress to the Board.

9. They shall take all necessary steps for overall improvement of the complex within three (3) months as proposed.
The concerned Regional Office of the Board shall keep vigil over the tanneries operating within leather complex and also the CETP, ETS, CCRU. The matter will be reviewed after three months. In case of non-compliance of the above direction, Board may take necessary regulatory action against CLCTA.

This direction is issued in exercise of the powers conferred under the provision of Water (Prevention & Control of Pollution) Act 1974, the Environment (Protection) Act, 1986 and Rules made thereunder after being approved by the Competent Authority.

By Order,

Sd/-
Senior Environmental Engineer
In-charge of Operation & Execution Cell
West Bengal Pollution Control Board