To,
The Secretary,
Ministry of Environment and Forest
Government of India
Paryavaran Bhavan CGO Complex,
Lodhi Road New Delhi - 110 003 INDIA

Subject:-Expansion of Distillery Unit (Grain based 50 to 125 kilo liter per day) at
Industrial Growth centre Ranipur Pathankot by M/s Pioneer Industries Ltd

O/O Ministry of Environment & Forest Government of India Northern Regional Office,
Bays No 24-24, Sector 31-A Dakshin Marg, Chandigarh 160030


Honorable Sir,

In reference above cited subject we come to know that a Distillery , located at plot no
A3.-A4 Industrial Growth centre Pathankot, has been recommended for expansion,
Since this Industrial Unit don't fulfill the siting parameter as laid down in the Technical
EIA , Guidance Manual for distilleries and not working as per the Environmental
Management plan.

This shall be pertinent to mention here that the Distillery is one of the 17 industries, for
which central pollution control Board has issued charter on corporate responsibility for
environmental protection.

As per the corporate responsibility for environmental protection, the proposal for new
distilleries and expansion of existing distilleries without achieving zero discharge will not
be considered by the Ministry of Environment & Forests / State Pollution Control Board
But the detailed monitoring report submitted by Sh Surinder Kumar Director (S),
Northern Regional Office Chandigarh Ministry of Environment & Forests has
recommended to enhance the existing capacity from 50 Kilo liters to 125 Kiloliters per
day of this Distillery .

This is against the Instruction of Central Pollution Control Board .While recommending
the expansion, he has submitted that no effluent is being discharge out side the factory
premises. This is not true to the ground reality.
The pioneer Industry is continuously throwing water through the Corporation Sewer through bassa khad that ultimately join river Beas.

The report submitted by the above said officer does not match with the Punjab Pollution Control Board. The Punjab pollution control has identified this Unit as one of the major pollutants. The Total quantity of discharge has been reported to by 1.18 Million liter of waste water per day  (including spent wash* 0.392 Million liters per day)

The detail report is enclosed & could also be reached through the web (link http://www.ppcb.gov.in/beas.php) this clearly indicates that the Unit is not working as per the norms laid down in the Manual.

Secondly, as per the notification No.  J-11013/56/2004-IA-II (I) issued by Joint Secretary to the Government of India (Published in the Gazette of India, Extraordinary, Part-II, and Section 3, Sub-section (ii) Ministry of environment and forests on dated 14th September 2006, the distillery having capacity more than 30 kilo liters per day has been categorized in the category A according to the project / activity no 5 (g) of this schedule & as per paragraph 2 (II) of this notification all the project or activities require prior environmental clearance for Expansion and modernization of existing projects.

The various stages for environmental clearance are clearly defined in the paragraph 7(I) that include Screening, Scoping, Public Consultation & finally Appraisal.

Since the detailed monitoring of this distillery was done on 24th July 2013 by Sh Surinder Kumar Director (S), Northern Regional Office Chandigarh Ministry of Environment & Forests.

This report is not reflecting the recommended project has been routed through the various Stages in the Prior Environmental Clearance (EC) as defined in the above said notification.

- The detailed monitoring report is not reflecting the date on which the Public Consultation was made for enhancement of Existing Capacity from 50 Kilo liters to 125 Kiloliters per day)
- The date of Inspection by the Member of Executive Committee for the modernization (Change of Fuel) as well as for the infrastructure developed for the enhancement of this distillery
As per the Punjab Industrial Facilitation Rules, 2007”, the Member of Executive Committee are clearly defined in the paragraph 8(I). Being a member of the Executive Committee, an Industrial Unit for which enhancement of expansion has been recommended should be sent with the remarks from the Managing Director Punjab Small Industries & Export Corporations as after Prior Environmental Clearance. (Enclosed photocopy for ready reference)

It appears that The Managing Director PSIEC Ltd or his representative has not invited to this Inspection nor invited to the written responses/objections, on Behalf of PSIEC Ltd.

The question doesn't arise for its expansion; rather the consent to operate should be revoked immediately without any further delay by the Punjab Pollution Control Board.

This unit Distillery does not deserve to be here because it is not only violating the siting parameters but also polluting the air, water, & noise (Detailed report is submitted in part B)

This Unit (Distillery) since its Inception is under question, because of the following reason

1. No distillery project that has been sanction at plot no A3 & A 4 of Industrial Growth Centre Pathankot. As per the Detail of Mega Project sanction by the Empowered Committee as on 31-03-2007.

2. The lease deed has been executed for manufacturing the gulucone and starch where as the Unit here exist at site is Distillery, clearly indicating the breach of lease deed.

3. The unusual size of Industrial plot allotted to M/s Pioneer Industry is also indicating that the land allotted to Pioneer Industry Limited in an illegal way after violating the land allotment policy.

4. Now again a unit which has been identified by the Punjab Pollution Control Board as a major source of contamination river Beas, for which the permission to operate should be revoked on the contrary, it is being recommend for the enhancement.

The Managing Director Sh Jagat Mohan Aggarwal of this Pioneer Industries Limited is intentionally, throwing the spent water / waste water to save the expenditure on this account. To treat the waste water & spent wash, in continuous process, mean subjected to Incineration boiler followed by evaporator to achieve zero discharge involves an investment of the order of 300 %-400% of the distillery cost.
The extent to the damaged caused by disposing of the effluent & waste water through corporation sewer in to bassa khad , that ultimately join river Beas in an illegal way is beyond repairable .

The quality & the quantity of the fly ash generated by using the rice husk as the fuel for the boiler & the unpleasant odours is so high that no body like to live here . He has converted the entire piece land (400 acres) developed by PSIEC LTD in to hell. All the efforts made by your department to develop this Industrial Growth centre & the money spent by the Government to promote the Industrialization have gone waste.

This can be well understood from the fact that there are only 25-30 number of residential building has been developed so far against the scope of 341 numbers of plots & 4-5 Industrial Unit has been developed against the 368 Number of plots after the allotment of more than 12 years of these plots. (21 years after the fund allotment 1500 lakh by centre & state Government) This place is strategically located & it is hardly 4.5 Km from the Municipal Corporation Limit.

The matter may please be investigated in detail. Meanwhile the action to enhance the existing capacity of this Distillery should be stop immediately because this enhancement recommended has not been routed through proper channel & without Prior Environmental Clearance.

We want that an asset created by the Government of Punjab & Centre Government, should live & grow to it full potential & that can not be possible without your assistance.

With regards

- Signature -
  President
  Resident Welfare Association
  Mobile 94171 94561
  Defense Road Industrial Growth Centre
  Pathankot  145023 ( Pb)

(The detailed objections are elaborated in Part B ) >>>>>>>>
To,
The Secretary,
Ministry of Environment and Forest
Government of India
Paryavaran Bhavan CGO Complex,
Lodhi Road New Delhi - 110 003 INDIA

Subject: - Expansion of Distillery Unit (Grain based 50 to 125 kilo liter per day) at Industrial Growth Centre Growth centre, Ranipur Pathankot by M/s Pioneer Industries Ltd

Honorable Sir,

1. An industrial Plot A-III & A-IV measuring 21.47 Acres in Industrial Growth Centre Pathankot (Pb) allotted to M/s Pioneer Industry Limited for the purpose of setting up Industrial Unit, to Manufacture gulucone and starch the lease deed is executed in the year 2004.

2. This Industry (gulucone and starch) has not been classified in Red or Yellow Industry (as per classification of Industries made by Ministry of Environment and Forests Govt of India –for the purpose of Environment clearance) this mean this Industrial plot has been allotted to M/s Pioneer Industry Limited for a non polluting Industry.

3. The Industry that exists at site is gulucone & Distillery. Actually the Industrial Plot A-III & A-IV that has been allotted to M/S Pioneer Industry Limited, is now converted in to a Distillery which is highly polluted Industry Classified as Red Industry and is also listed as one among the 17 categories of highly polluting industries. (As per classification of Industries made by Ministry of Environment and Forests Govt of India as well as Punjab Pollution Control Board – List Encloses )

4. This plot is allotted to M/S Pioneer Industry Limited on lease to manufacture the gulucone and starch, & this firm has been producing gulucone & starch to up to 2005. This is pertinent to mentioned here gulucone & starch is used in the Distillery for manufacturing the alcohol.

Now they are not only producing gulucone and starch but have converted this unit to a distillery without any permission from the PSIEC LTD & by the Department of Industry & Commerce.
5. The detail of Meg Project sanctioned by the Empowered committee as on 31-03-2007, is given can be seen in the Official website of Department of Industry & Commerce –Punjab. It is clear from this list that no such unit Distillery has been sanctioned in the Industrial Growth Centre or near by village Ranipur to M/S Poineer Industry Limited.

This list can be seen (Enclosed the list for ready reference) 
http://www.pbindustries.gov.in/downloads/List%20of%20mega%20projects.pdf

6. While going in detail to this list A distillery project has been sanctioned to the M/S Pioneer Industry Limited. The detail is given at the S.No 22. According to this the location of Industrial unit is given at is at Chotti Nehar, Malakpur, Pathankot 145025.

7. This create a doubt in mind that the Industrial unit has been shifted 15.8 Km from the actual location, to the Industrial Growth Centre Pathankot at plot number A-III & A-IV (village Rannipur) means the Inspection made by the Empowered Committee/report is at Chotti Nehar, Malikpur, Pathankot but the unit has been set in Plot A-III & A-IV of IGC Pathankot (Village Ranipur Pathankot)

8. We do have sufficient reason to believe that this Industry (Distillery) located at Industrial Growth Centre Pathankot, the Inspection for this has been made some where else.

Because as per the Industrial Facilitation Rules 2007 para 8 (1) the Managing Director Punjab Small Industries & Export Corporation Ltd is a Member of the Executive Committee * & he is to raise the objection, that this unit can not be allowed to set up here at Industrial Growth centre because the Lease has been given to for the Purpose to set up an Industrial Unit to manufacture gulucone & starch Secondly the Distillery is highly polluting in nature & can directly effect in the Growth of this Industrial Growth centre.

It appear that The Managing Director or his representative has not only invited to this Inspection nor invited to the written responses/objections, on Behalf of PSIEC Ltd. The matter need to be investigated in detail how this Industrial Unit (Distillery) has come up here at the Industrial Growth Centre Pathankot.

• The List of the Members of the Executive Committee is detailed page 23
9. This clearly shows the breach of Lease deed, & the land acquired by the Pioneer industry Limited after deceiving the officials of PSIEC Ltd / by using the political connection /or by use of money power or both.

The unusual size of Industrial plot allotted to Pioneer Industry Limited is also indicating that the land allotted to Pioneer Industry Limited in an illegal way after violating the land allotment policy. Otherwise how it Could be possible for an Industry to acquire a piece of Land measuring 21.47 Acres.

A snap shot of the official website of Department of Industry & Commerce showing the size of Plot that was allotted was from 300 sq.yd to 3 acres. Where as the size of this plot is 21.47 Acres (As per approved plan from the office of Chief Engineer PSIEC Ltd no T.P/PSIEC.92/31 Dated 10-02-1992)

10. The demarcation from the revenue department may be taken, to know the actual location on which this distillery is located. In addition to this PSIEC Ltd may also take a join demarcation from the Revenue Department / or may take the assistance of Chief Engineer PSIEC LTD , to know the actual area which is under the Unit set to manufacture the gululcone & starch, & the area under Distillery.

Area if any found to used for the purpose for which the Lease deed has not been executed (use of area for a purpose for which the lease has not been given) the action may be initiated to terminate the lease deed.

11. This Distillery is highly polluting Industry. The main source of pollution is spent wash. On averages the daily waste water that would be generated is after expansion of this Distillery is 1893.06 kiloliter per day including 1197.50** kiloliter spent wash *.

*unwanted residual liquid waste generated during alcohol production

** Calculated on page 23 of this report on the basis of study conducted by Central Pollution Control Board Central Zonal Office Bhopal is enclosed here for your ready reference

Where as the detailed monitoring report conducted by Sh Surendra Kumar Director (S), Northern Regional Office Chandigarh Ministry of Environment & Forests on 27-06-2012 & again on 17-03-2013.

As per the report it is mentioned that the spent wash will be passed through decanter and concentrated in multi-effect evaporator (MEE) Thick syrup and wet
cake will be mixed together to form Distiller wet grains with soluble to achieve Zero discharge. Spent Lee, MEE Condensate and utilities waste water will be treated in the effluent treatment plant & the treated water will be recycled/reused within the factory premises.

No effluent will be discharge outside the factory premises and Zero discharge concept will be maintained.

The reality on ground does not match; the Punjab Pollution control board has already identified this unit as one of the major source of pollution. The quantity of spent wash spent 0.392 Million liter per day. Total quantity of this discharge has been, reported to be 1.18 Million liter per day. The detail report is enclosed & could also be reached through the web (link http://www.ppcb.gov.in/beas.php

12. This clearly indicates the Pioneer Industry is not complying to the Instruction & the effluent from distillery such as spent wash & waste water released from the Distillery is being discharged outside the factory premises and the concept of ‘Zero’ effluent discharge is not being maintained & Process effluent/any wastewater is being mixed with storm water.

Actually this is an expensive process. The Managing Director Sh Jagat Mohan Aggarwal is intentionally, throwing the waste water to save the expenditure on this account.

To treat the waste water & spent wash, in continuous process, mean subjected to Incineration boiler followed by evaporator to achieve zero discharge involves an investment of the order of 300 %-400% of the distillery cost.

13. Need not to mention here, this discharge is being made by M/S Pioneer Industry Limited, by conveying this water through the Sewer developed & maintained by PSIEC Ltd. Action need to be initiated, to disconnect the sewer so that M/S Pioneer industry may not pollute the river beas.

As per clause no19, of lease deed, no effluent of Industrial waste shall be permitted to be discharge in the public Corporation Sewer or disposal of the same into stream well or in to land unless consent of PSIEC, PPCB & Punjab Water Supply Board is to be obtained.
14. The Resident Welfare Association of Industrial Growth Centre, do have the sufficient reason to believe that, the Pioneer Industry is having no valid certificate as on date, because as per the guideline for sewerage connection to PSIEC Ltd issued by Department of Industries & Commerce, Punjab, no industrial influent can be discharge in to sewerage connection, & the sewerage connection is to be used only for the toilet waste, & the unit should be non polluting.

Both the conditions are not being fulfilled as the Unit is highly polluting in nature, & is using this sewer connection for disposing the Industrial waste in the Sewer developed & maintained PSIEC Ltd.

(A copy of Affidavit that is to be submitted along with the application for sewerage Connection is enclosed for ready reference– at page 28 )

Thus pioneer Industry is not eligible for this sewer connection, hence should be disconnected immediately without any further delay.

15. As we pass through the main road leading to this Industrial Growth centre, some time we can feel the smell of the effluent from the manhole of the sewer line it smell so pungent that even a man of ordinary prudence can easily make out that effluent is being disposed off (bassa khad) untreated.

The below mention report* presented at the International Conference on Future Environment and Energy at Singapore is about the problem from the waste water of Distillery.

This report indicate that the spentwash is of major environmental concern owing to its quantity and quality. On an average 10-15 litres of spentwash is generated for every litre of alcohol produced. If disposed of untreated it also reduces the yield of the crop. The detail of waste water and spent wash is calculated on page 22.

The report submitted by the Punjab Pollution control, is only about the quantity of waste water & spent water that is being thrown to the river Beas (by conveying the water through the PSIEC Ltd Sewer, at the disposal point at Bassa Khand/ Haler Khad, ) but the general standard of discharge of the environment pollutants is not given in this report.
16. The entire source of water has been contaminated, The tube well No 01 has been put out of use because of the quality of the ground water. The water near this tube well is contaminated to the extent that is is not safe for the drinking purpose. The PSIEC LTD is supplying the water to the resident & is well aware of the fact, that the Pioneer Industry Ltd is polluting the water, but there a great need to initiate the action.

- In addition to the waste water the pioneer Industries ltd is also contaminating the water by infiltrating by throwing the waste water, on the vacant land.
- The failour of the tube (because of the quality of water is not safe for drinking) indicate that Pioneer Industries Limited might also be disposing the waste water through the bore well that ultimately join the ground water.
- It is possible if you see the depth of the water, it is 40-95 Meter) The situation is alarming (Please investigate)

- The underlying groundwater should be tested to ensure that it should not having a BOD more than 3 mg/L and 10 mg/L of nitrate & check for other parameters such as pH, Chloride, Sulphate and total dissolved solids in to the water.

17. The Punjab Pollution is well aware of the fact that this Industry is discharging the effluent in to the Municipal sewer. Though the quantity of effluent as well as the spent wash that is being discharge by the Pioneer Industry Limited is available in the official web site of Punjab Pollution control but the General standard for discharge is not available.

The sample may be got examined in any of the approved laboratory for general standard of discharge. (List can be found in (http://www.cpcb.nic.in/13_ListRecognizedEnvironmentalLaboratories.pdf)

Alternatively the excessive contents of potassium and sulphur, into the soil (sample of soil may be got examined from any of the lab) would be sufficient to
reach to the conclusion that the discharge that is being made is without any treatment.

18. In addition the emission from the DG sets and Boiler containing SPM, SO2, NOx, etc & are the major source of pollution. The pioneer Industry is required to setup ambient air quality monitoring stations & for monitoring of SPM.

It is mandatory to establish Ambient Air quality monitoring station, so that the Industry in operation should not emit beyond the National National Ambient air quality Emission standards issued by the Ministry vise GSR number 826(E).

This Industrial Unit is in operation since 1st April 2006, but even after the expiry of more than 07 year this pioneer Industry Limited has not established ambient air station. This clearly indicates the Control of these officers on these Industrialists.

In the detailed monitoring report conducted by Sh Surendra Kumar Director (S), Northern Regional Office Chandigarh Ministry of Environment & Forests on 27-06-2012 Instructed on page 07, to expedite compliance by the end of November 2012 positively but the Instruction has not been complied & again on 17-03-13 this officer has again Inspected the site & found the Instruction Issued has not been Complied.

Further this officer is reporting that the ambient air quality is being monitored by an outside approved lab namely SIMA located in Delhi that can not be possible because the sampling duration & frequency as per clause 4.2.4 the guidelines for ambient air quality monitoring issued by a Central Pollution Control Board for the pollutants like Sulphur, SO2, NO2 it is required to take the concentration in ambient air an annual Arithmetic mean of minimum 104 measurements should be taken in a year.

These reading should be taken twice a week at 24 hourly at uniform interval, how it is possible for an agency like SIMA located at Delhi can monitor this from Delhi.

19. The Poineer Industry Limited is supplying the factious test report, in the name of SIMA These on the basis of which Sh Surinder Kumar Director (S), Northern Regional Office Chandigarh Ministry of Environment & Forests is reporting that
this Distillery is complying the National Ambient air quality Emission standard issued by the Ministry vide GSR NO 826(E) Dated 16th November 2009.

How could we believe that the Agency nominated & paid by the Pioneer Industry Limited would give the results that are true to the reality on ground. These record may used by the Pioneer Industry/ or any other Industry for self monitoring that is required )

Such records are merely for the purpose of maintaining the record & can not be considered to be true & shall not be used to decide to renew the consent to operate /for the purpose of enhancement of the existing capacity of the plant.

Has he ever taken any sample signed & seal in his presence & sent to the Governments Laboratory to cross examine any of these results?

These reports are seems to factious because of the reason ,

- An agency nominated approved by Ministry of Environment & Forest is supposed to be well aware of the sampling duration & frequency as per clause 4.2.4 & can not certify the Pioneer Industry is complying the National Ambient air quality Emission standard issued by the Ministry vide GSR NO 826(E) Dated 16th November 2009.
- There is no such agency by Name SIMA which as been approved by the Ministry of Environment & Forest ( the name of this firm is not complete or the report submitted is factious
- The Agency that has been approved can be reached through the web page http://envfor.nic.in/legis/env/so728e.doc

20. While looking to the detailed monitoring report conducted by Sh Surendra Kumar Director (S), Northern Regional Office Chandigarh Ministry of Environment & Forests on 27-06-2012 it is stated that there are 4 number of Diesel Generators set having capacity of 550 KVA or above.

These generators & other activities of the plant are mostly executed in the night. We don’t thing noise level will remain well within the limits and shall conform to the standards prescribed because the sound that we hear is irritating & not only disturbing our peace of mind but some time not allow us to have sound sleep in the night.
Though it is difficult to prove in the court of law, an expert opinion may be taken from the Institutes like National Environmental Engineering Nehru Marg Nagpur PIN 440020, & that is it possible if all the Generators for the capacity as given above if work simultaneously will able to maintain the norm for the noise that is 75 dBA (day time) and 70 dBA (night time).

21. This distillery neither fulfilling the siting parameters initially nor at the time enhance the existing capacity of distillery from 50 Kilo liters to 125 Kiloliters per day & fail to refer the terms of the references for the Environmental Impact Assessment Studies as detailed in para 4.3.6 of the above said manual

- To study the area up to 10 Km from the boundary of the project site, to the information of this officer, this distillery is located hardly at a distance of 5 km from the boundary of Municipal Corporation of Pathankot.

- Whereas the road distance from the heart of city Pathankot that is Gandhi Chownk is hardly 8.6 Km from this Distillery. An Arial map is enclosed for your ready reference.

- Pathankot has given the status of Municipal Corporation on 5th Day of April 2011. The revised map of Municipal corporation as per the map of Department of town Planning is enclosed.

- As per the guidelines for location of industries by the Punjab Pollution Control Board, the distance from the city limit of metropolitan cities/Municipal Corporation for Hot Mix Plant* it should 5 km as per clause 2.2.4

- While looking into the detail of the Municipal Corporation Boundry, the Sujanpur is a part of Municipal Corporation of Pathankot as it could be seen in the above said plan The Municipal Corporation limit towards the Sujanpur side as it could be seen in the above said map end at Madopur Beas Link canal the distance for an Industrial Unit is hardly 4 Km, to clearly define this the help of Google map has been taken.

- An aerial map enclosed here clearly show the distance indicating the distance from Municipal Corporations hardly 4.0 km.

- The status of Municipal Corporation is given only after when the population of any city exceed beyond 3 lacks, Mean it is one of the major settlement
defined in the Assessment Guidance Manual for Distilleries issued by the Ministry of Environment and Forests Govt of India.

- The siting parameter per the above said manual say that the Industry should be sited from major settlement at least 25 km from the projected growth boundary.

Hence question doesn’t arise for its expansion

( * As the Guidelines for Distillery is not available – the comparison is made with the similar industries ( Classified as Red Industry ) From this list the Distillery is classified as Red Industry.& is placed in Part A at S No 09 indicating this is among the 17 highly polluting Industry, where as Hot mix plant is classified as red category Industry In Part B at S.No 19 )

22. This Industry ( Distillery ) is hardly located at a distance of 1.00 Km from the Residential Town developed by PSIEC Ltd .This can be verified from the approved drawing No T.P/PSIEC.92/31 Dated 10-02-1992.

The location of Industrial Unit is at plot No A-III & A-IV which is hardly at a distance of 1.0 K.M from the residential colony developed by PSIEC Ltd.

Out of these 341 residential plot the First phase of allotment for 205 no of Industrial has been made in May 2001, & this Industrial Unit Developed by Pioneer Industry Limited has started it Commercial Production with effect from 1st April 2006, as per the detail Monitoring report Conducted by Sh Surendra Kumar Director (S), Northern Regional Office Chandigarh Ministry of Environment & Forests on 27-06-2012.

This clearly indicates that this Unit has come up after the allotment of this plot & construction of the residential colony .The empowered Committee can not permit this Industrial Unit to be here and more over the consent of PSIEC Ltd considered while inspecting this site.

Not only this, distillery is not situated outside the Lal lakir of village Akhwana & thus can’t allow this Industrial Unit (distillery ) to set up in the Industrial Growth Centre Pathankot
23. **This acetaldehyde** is emitted during fermentation from this distillery, is **Hazardous air pollutant**. (As stated in Technical Environmental Impact assessment Guidance Manual for distilleries)

    These standards have been fixed to protect the public health, vegetation & property. **This Industry is not working as per the Environmental Management Plan** & also not complying with the Instruction issued by the various officers from time to time.

24. **The Inspection for this distillery to enhance the Capacity from 50 Kilo liters to 125 Kiloliters per day has been made by Sh Surinder singh Director has been done on 17-03-2013**, from this report the General remarks given are assured to comply & being complied.

    The report submitted was after ignoring the office order/ notification F. No. J-11011/S18/2010-IA-1I (I) issued on 31st May 2012 by MOE&F on the subject regarding the Consideration of expansion proposals for grant of Environmental Clearance under the EIA Notification, 2006 **the project proponent shall henceforth submit a certified report of the status of compliance** of the conditions stipulated in the environmental clearance for the ongoing / existing operation of the project by the Regional Offices of the Ministry of Environment and Forests.

    **Why he is in hurry in submitting the proposal, & what is the fun submitting the status of compliance? when it took more than seven year to complying a items such as to establish Ambient Air quality monitoring station.**

    The levels of PM10, SO2, NOx, CO and HC (Methane) in ambient air **shall be monitored and displayed at a convenient location near the main gate of the company and at important public places.** The Pioneer Industry is not complying this Instruction, the report do not reflect this issue.

    The Pioneer Industry is supposed to provide adequate numbers of ground water quality monitoring stations by providing piezometers around the project area. This is not being Complied.

    The company shall upload the status of compliance of the stipulated environmental clearance conditions, including results of monitored data on its
website and shall update the same periodically. Again this Industry has not
complied this Instruction.

Central Pollution Control Board Ministry of Environment & Forests has issued
charter on corporate responsibility for environmental protection. Distillery is one
of these 17 Industries As per the CREP Proposal for new distilleries and
expansion of exiting distilleries will out achieving zero discharge in surface
water/groundwater will not be considered MoEF/SPCB. The Industry is
Continuously discharging effluent in to the

This report is not reflecting any where the official accompanied this Inspection.

This Pioneer Industry should have self monitoring system, as per 4.1.4, of
Manual no 4 & The data collected by the industries shall be maintained by the
industries on daily basis and shall be submitted to the Board by the 5th of the
following month. Nothing has been said regarding the satus of compliance of this
item.

25. The report submitted without taking in to the consideration the direct or Indirect
Impact on the Ground water table. The total water requirement after
expansion of the Distillery would be 1890/1750* cubic meter per day.
(Calculated as per detail on page 24)

* As stated in the detailed monitoring report Sh Surendra Kumar Director (S),
Northern Regional Office Chandigarh Ministry of Environment & Forest on
dated 17-03-2013

As per the latest Instruction, from the Central Ground Water Authority If the
Total fresh water requirement from ground water is more than, 630 m3/day for
distillery and cogeneration unit than prior permission for drawl of water shall
be obtained from the Central Ground Water Authority/State Ground Water
Authority

This application submitted to the Director (S) Monitoring Cell, without prior
permission from the Central Ground water authority as well as, from the chief
Engineer PSIEC Ltd. Hence the question doesn’t arises for granting the
permission for its expansion.
This Industrial Growth centre is having the scope for 368 number of Industrial Unit, and 341 number of residential houses. The requirement of the Industrial Growth Centre Pathankot calculated on the basis of IS Code 1172:

<table>
<thead>
<tr>
<th>No</th>
<th>No of Plots</th>
<th>No of Consumer</th>
<th>Lpcd</th>
<th>Daily Water Requirement cubic meter</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Industrial Plot</td>
<td>368 X 10 X 45 X</td>
<td>= 165.6</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Residential Plot</td>
<td>341 X 5 X 150 X</td>
<td>= 255.75</td>
<td></td>
</tr>
</tbody>
</table>

Total = 421.35 cubic meter

This single Industrial unit (Distillery) requires 1890 cubic meter water per day. Where as the total requirement of Industrial growth centre is only 421.35 cubic meter per day.

The yield of the tube well/capacity Source may be examined. The requirement of this single Industrial unit is so much that this will not only directly effect the ground water table, but likely to create water problem in future.

This report is submitted by the Pioneer Industry without the proof regarding the availability of requisite quantity of water from the competent authority ie from Chief Engineer PSIEC Ltd and without ground water related issues & problems.

* Calculated as per BIS IS Code 1172, Code for basic requirement of water supply.

26. The total quantity that has been calculated 1890 cubic meter per day, that will generate 1115 cubic meter of water per day, including 928.80 liters of spent wash.

As per Sh Surinder Kumar this water shall be treated in the effluent plant & shall be used within the factory premises.

- Please let us know the detail of activities that require 1115 cubic of water daily.
• Could he explain the total cost to treat this water (1115 cubic meter per day) & the amount required to concentrate & incinerate in the incineration boiler to achieve zero discharge.

• The quantity of thick syrup and wet cake that would be required for 928.80 cubic meter of spent water daily to form Distillers wet grains with soluble.

Actually this process is so much costly (it cost 300 to 400% to the cost of distillery) practically this is not being exercised; the waste water along with the spent water is not only thrown outside the factory premises but also thrown back to mix along with the ground water through the borewell.

27. This report is not reflecting the recommended project has not been routed through the various Stages in the Prior Environmental Clearance (EC) as defined in the above said notification.

As per the notification No. J-11013/56/2004-IA-II (I) issued by Joint Secretary to the Government of India (Published in the Gazette of India, Extraordinary, Part-II, and Section 3, Sub-section (ii) Ministry of environment and forests on dated 14th September 2006, the distillery having capacity more than 30 kilo liters per day has been categorized in the category A according to the project/activity no 5 (g) of this schedule & as per paragraph 2 (II) of this notification all the project or activities require prior environmental clearance for Expansion and modernization of existing projects.

The various stages for environmental clearance are clearly defined in the paragraph 7( I ) that include Screening, Scoping, Public Consultation & finally Appraisal. Since the detailed monitoring of this distillery was done on 24 th July 2013 by Sh Surinder Kumar Director (S), Northern Regional Office Chandigarh Ministry of Environment & Forests.

28. The condition is going from bad to worse, The unpleasant odours (released after certain interval of times) caused by the emission from the fermentation process, vapour and stack emissions & other process has converted this beautiful piece of land in to hell, by the Pioneer Industry Ltd & no body like to live here.

This can be well understood from the fact that there are only 25-30 number of residential building developed so far against the 341 number of residential plots & 4-5 Industrial Unit against the 368 Number of Industrial plots after the
allotment of more than 12 years of these plots. (21 years after the fund allotment 1500 lakh by centre & state Government) Though this place is strategically located & it is hardly 4.5 Km from the Municipal Corporation Limit.

29. The Expenditure incurred 1004 lakhs* (against the fund released 1500 lakh on 26/1/1992) to develop the Industrial Growth Centre as per the report no 2 of 2000 (Civil) issued by the Comptroller and Auditor General of India to Develop the Industrial Growth Centre Pathankot, to promote industrialization in backward areas.

30. The use of rice husk, as fuel for boiler has added yet another problem for the resident of Industrial growth center. It is the case of modernization of existing projects & require to be routed through the various of Environment Clearance

31. It appear that The Managing Director or his representative has not only invited to this Inspection nor invited to the written responses/objections, on Behalf of PSIEC Ltd, other wise the question doesn’t arise for it expansion.

32. Is it the power of money or the political pressure, that an Industry which is not working as per the norms laid down & has been identified as one of the major source of pollution by the Punjab Pollution Control Board. The consent to operate for this unit is likely to be revoked the contrary this unit is being recommended for expansion.

33. A senior Administrative Officer level committee may be appointed to find out the reason for the failure of the entire system & to the extent of damage that has been caused by the Pioneer Industry Limited to the Soil & to the Ground water table.

So that action can be initiated to panelize the Pioneer Industries as per the para Technical Environmental Impact Assessment guidance Manual for distillery issued by MOE& F.

34. Meanwhile the action to enhance the existing capacity of Distillery should be stop immediately because the enhancement has not been routed after having Prior Environmental Clearance.
We want that an asset created by the Government of Punjab & Centre Government, after spending more than 1500 lakh* should live & grow to it full potential & that is possible only after knocking out this Industry which appear to be here in an illegal way & is the huddle in the growth of this Industrial growth centre because the unpleasant odours & fly ash.

With regards

- Signature -
Secretary, Resident Welfare Association
Mobile 94171 94561
Defense Road Industrial Growth Centre
Pathankot 145023 (Pb)

Copy Forwarded for information & necessary action to,

1. His Excellency to The “Governor of Punjab “ Chandigarh
2. Secretary, to the Ministry of Environment and Forest Government of India
3. Comptroller & Auditor General of India
4. Member Secretary, Central Ground Water Authority, New Delhi
5. Chairman Central Pollution Control Board
6. Principal Secretary to Govt. of Punjab ,
7. Principal Secretary Deptt Industries & Commerce Punjab
8. Chairman Punjab Pollution Control Board
9. Principal Secretary Department of Water Supply & Sanitation, Punjab
10. Chief Conservator of Soils, Punjab

* This amount is as per the fund released by Centre & State Government
Supporting Document Attached

1. Details of Meg Projects Sanctioned by Empowered Committee as on 31-03-2007
2. Notification under sub-rule (3) of Rule 5 of the Environment (Protection) Rules, 1986 for imposing certain restrictions and prohibitions on new projects or activities, or on the expansion or modernization of existing projects
3. Siting Guidelines, for similar Industry (Classified as red Industry)
4. Snapshot from the official website of Punjab Pollution Control Board showing pollution by Pioneer Industry Ltd
5. Snapshot of the official website of Department of Industries & Commerce showing the size of plot (300sq yards to 3 acres) that has been allotted.
6. Sketch (Google map) showing the distance of this distillery is less than 5 km thus there by infringing the siting parameter
7. Part plan of the effected area, near by the distillery
8. Water requirement as per is1172:1993
9. Affidavit for Sewerage connection require to be submitted for sewerage connection
10. Photographs showing the fly ash daily generated causing nuisance to the Resident of Industrial Growth Centre.
<table>
<thead>
<tr>
<th>Source of Information</th>
<th>Information available</th>
<th>Link</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Detail of Maga Project Sanctioned by Empowered Committee as on 31-03-2007</td>
<td><a href="http://www.pbindustries.gov.in/downloads/List%20of%20mega%20projects.pdf">Detail of Maga Project</a></td>
<td></td>
</tr>
<tr>
<td>2 Expansion of Distillery Unit (Grain based 50 to 125 kilo liter per day)</td>
<td><a href="http://nromoef.gov.in/Environment_Reports/Reports/2013/32.pdf">Expansion of Distillery</a></td>
<td></td>
</tr>
<tr>
<td>4 Environmental Clearance, procedure, various stages (Notification)</td>
<td><a href="http://www.envfor.nic.in/legis/eia/so1533.doc">Environmental Clearance</a></td>
<td></td>
</tr>
<tr>
<td>7 Report for reference, for calculation of discharge</td>
<td><a href="http://cpcb.nic.in/Grainbaseddistilleries.pdf">Report for reference</a></td>
<td></td>
</tr>
<tr>
<td>8 Guidelines for Ambient Air Quality Monitoring</td>
<td>[Guidelines for Ambient Air Quality Monitoring](<a href="http://cpcb.nic.in/NAAQSM">http://cpcb.nic.in/NAAQSM</a> manualVolume1.pdf)</td>
<td></td>
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<tr>
<td>9 Master Plan for Pathankot</td>
<td><a href="http://puda.gov.in/img/approved_masterplan_files/pathankot_plan.pdf">Master Plan for Pathankot</a></td>
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</tr>
<tr>
<td>10 Wastewater from Distillery Industry</td>
<td><a href="http://www.ipcbee.com/vol28/24-ICFEE2012-F20011.pdf">Wastewater from Distillery Industry</a></td>
<td></td>
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</tbody>
</table>
These rules may be called “The Punjab Industrial Facilitation Rules, 2007”.

As per 8(1) of these rule

Executive Committee

An Executive Committee comprising of following Members will assist the Empowered Committee constituted under Section 5(1) of the Act:

- Director of Industries & Commerce, Punjab - Chairman
- Excise & Taxation Commissioner, Punjab - Member
- Director of Factories, Punjab - Member
- Chief Engineer (Commercial), - Member
- Punjab State Electricity Board
- Chief Town Planner, Punjab - Member
- Chief Administrator, PUDA - Member
- Member Secretary, - Member
- Punjab Pollution Control Board
- Chief Conservator of Forests - Member
- Managing Director Punjab Small Industries & Export Corporation - Member
- Managing Director, Punjab Financial Corporation - Member
- Managing Director, Punjab Agro Industries - Member
- Chief Coordinator, Udyog Sahayak - Member Secretary

(ii) The Committee will associate Representatives of concerned departments, as and when required in its meeting.

(iii) The Committee will meet once in a month or earlier, if required.

(iv) The Committee will assist the Empowered Committee constituted under Section 5(1) of the Act.
<table>
<thead>
<tr>
<th>Source</th>
<th>Purpose</th>
<th>Consumption in Kilo liter per day</th>
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<tbody>
<tr>
<td>Process</td>
<td></td>
<td>1197.50</td>
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<tr>
<td>Steam Generation</td>
<td></td>
<td>74.97</td>
</tr>
<tr>
<td>Washing</td>
<td></td>
<td>Nil</td>
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<tr>
<td>Cooling</td>
<td></td>
<td>453.99</td>
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<tr>
<td>Domestic</td>
<td></td>
<td>166.60</td>
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<tr>
<td>Total</td>
<td></td>
<td>1893.06</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Type of waste water</th>
<th>Quantity in Kilo liter per day</th>
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<tr>
<td>Spent wash</td>
<td>928.80</td>
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<tr>
<td>Spent leese</td>
<td>154.11</td>
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<tr>
<td>Fermentation Washing</td>
<td>-</td>
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<tr>
<td>Floor washing</td>
<td>-</td>
</tr>
<tr>
<td>Bottle Washing</td>
<td>-</td>
</tr>
<tr>
<td>Condensate</td>
<td>-</td>
</tr>
<tr>
<td>Cooling</td>
<td>13.3</td>
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<tr>
<td>Other</td>
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<tr>
<td>Total</td>
<td>1116.2</td>
</tr>
<tr>
<td>Say</td>
<td>1115</td>
</tr>
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</table>

Calculated on the basis of study conducted by Central Pollution Control Board Central Zonal Office Bhopal