

## MAHARASHTRA POLLUTION CONTROL BOARD

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No. MPCB/AS(T)/TB/B- 527/

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### CIRCULAR

**Sub :** Guidelines for implementation, verification & reporting of the compliance of condition of Lock & key arrangement.

The Board is imposing the condition of provision of lock & key arrangement at final outlet for regulating effluent discharge of industries who are disposing their treated effluent to CETP for further treatment, in the Consent/restart /conditional directions. This condition is imposed in order to have check on the non complying units & to have a control in the short time emergency situation due to maintenance work of leakages/breakages in effluent carrying pipeline and CETP.

For proper implementation of the said condition, guidelines have been prepared and enclosed herewith (Annexure).

All Officers' of the board are hereby directed to scrupulously follow the guidelines for implementation, verification & compliance reporting.

  
(Rajiv Kumar Mital, IAS)  
Member Secretary

Copy to:

1. All HOD's, MPC Board, Mumbai
2. All RO's/ SRO's MPC Board.
3. All CETP organizations for circulation to their member industries.
4. MIDC

**Guidelines for the compliance of condition of Lock & key arrangement.**

1. **Definition of Lock & Key:** The Lock & key system means provision of holding tank of one day capacity for treated effluent and having discharge regulating valve to CETP drainage line with lock which will be opened/operated by using two different keys at a time. Out of two keys one set of keys will be with the industry & another set of key will be with CETP. In emergency cases MPCB/ MIDC can take over the set of keys with CETP Association.
2. **Applicability:** Lock & Key concept will be applicable to SSI industries disposing their primary treated effluent to CETP for further treatment. However in specific situation Board may impose this condition on LSI/MSI units also.
3. **Functioning / Working of Lock & key System:** The industry shall store the primary treated effluent meeting the prescribed standards, in the holding tank. As soon as the tank is about 90% full, they will inform the regulatory authority about their intention to release the effluent into the drainage leading to CETP. The regulatory authority will open the lock and allow the effluent in the system. The lock will be again applied after the effluent is discharged. In case of emergency due to either non working of CETP OR the effluent from the industry being apparently of sub-standard quality OR maintenance work of CETP/drainage line, the regulatory body will have power to refuse/withhold discharge of treated effluent into the drainage system. The regulatory body may be MPCB official, OR CETP representative OR MIDC representative, duly authorized by MPCB for that area. The industry will have to regulate the production activity suitably to stop effluent generation, during this time.
4. **Why lock & key arrangement is required? :** Lock & Key concept came in picture for effective working of CETP & piping system for transfer of pre treated waste water by underground piping network from individual industry to CETP. Following factors are considered for the lock & key arrangement.
  - I. MIDC has provided drainage network in most of industrial clusters where facility of CETP available. In such industrial cluster as per tri-party agreement between MIDC, Member industries & CETP association the inlet standards of CETP & outlet/discharge standards of industries are to be decided as per design of CETP.
  - II. However, many time it is observed that most of unit have not achieving the discharge standards & are discharging partially treated / untreated effluent to CETP, due to which functioning of CETP is hampered, which is resulting substandard final effluent quality from the CETP. Due to the common effluent collection system in the area, it is difficult to identify and fix the responsibility on culprit unit.
  - III. The One day storage and lock and key arrange will also help in take care of minor problems in maintenance work in CETP and drainage line.