



केन्द्रीय प्रदूषण नियंत्रण बोर्ड
CENTRAL POLLUTION CONTROL BOARD
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय भारत सरकार
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE GOVT. OF INDIA

Speed Post

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September 22, 2015

To

CBWTF Association of India
307-308, Century Centre, Near Gujarat Samachar Press,
Kanta Stri Vikas Gruh Road,
Rajkot - 360002, Gujarat.

Sub: Installation of Continuous Emission Monitoring System by the Bio-medical Waste Incinerators as a part of self monitoring of compliance - reg.

Sir,

This has reference to your letter dated 01.06.2015 seeking exemption in installation of continuous online monitoring system by the Common Bio-medical Waste Treatment Facilities (CBWTFs). In this connection, it is to inform that as per the decisions taken in the stakeholder review meeting held at Ministry of Environment, Forests & Climate Changes (MoEF & CC), Delhi on 16.06.2015, subsequently a hearing was given on 17.06.2015 to the representative of Common Bio-medical waste Treatment Facilities and Common Hazardous Waste Treatment, Storage and Disposal Facilities (HWTSDFs). In the afore-said meeting, the difficulties expressed by the Common Bio-medical Waste Treatment Facilities were discussed specially on issues such as: (i) small diameter stack connected with the BMW incinerators; (ii) presence of moisture content in the stack gas; and (iii) few hours of operation of the treatment equipment.

In the aforesaid meeting, it was clarified that the Bio-medical Waste Treatment Facility operators are required to take action on the following; (i) install Continuous Online analysers for measurement of Carbon Monoxide (CO) and Carbon Dioxide (CO₂) in flue gas; (ii) install online analyser for measurement of Temperature in primary and secondary chambers of the incinerators; and (iii) install Data Transition equipment and linkage with the server of the concerned State Pollution Control Board / Pollution Control committee and CPCB. A copy of the minutes of the afore-said meeting held at CPCB, Delhi on 17.06.2015, is enclosed for ready reference.

In view of the above, I am directed to inform that Association of CBWTF operators may inform all their member facilities to install Continuous Emission Monitoring Systems as clarified above.

Yours faithfully,


[B Vinod Babu]
AD & I/c HWMD

Encl.: As above

Central Pollution Control Board

(Hazardous Waste Management Division)

Parivesh Bhawan, East Arjun Nagar

Delhi - 110032

Minutes of the Meeting with the representatives of Common Bio-medical Waste Treatment Facilities held on 17.06.2015 at CPCB Delhi.

In continuation to the meeting taken by Chairman, Central Pollution Control Board on June 16, 2015 at MoEF &CC, a meeting was held in Central Pollution Control Board (CPCB), Parivesh Bhawan, Delhi with representative of the Common Bio-medical Waste Treatment Facility (CBWTF) & Common Hazardous Waste Treatment Facilities. The following officials of CPCB and representative of CBWTFs were present in the said meeting:

- (i) Sh. J. S. Kamyotra, Director, CPCB;
- (ii) Shri. Sanjay Kumar, M/s Ramky Energy & Environment Pvt. Ltd, Delhi;
- (iii) Shri B Vinod Babu, Additional Director, HWM Division, CPCB, Delhi;
- (iv) Shri J Chandra Babu, Sc. 'D', HWM Division, CPCB, Delhi; and
- (v) Mrs. Youthika, Sc. 'C', HWM Division, CPCB, Delhi.

Shri B Vinod Babu, appraised about the representations received from the CBWTF Association of India requesting exemption of installation of continuous stack emission online monitoring system for the Bio-medical waste incinerator operators. Considering the technical difficulties in installing the continuous online emission monitoring system especially w.r.to (i) small stack diameter ranges from around 30 to 60 cm (based on the few facilities data) and in case of BMW Incinerator operated by the HCFs, stack diameter range is about 10 to 40 cm (based on the data of few incinerators operated by the HCFs) ; (ii) presence of high moisture content; and (iii) low operating period of the most of the bio-medical incinerators i.e. 4 - 6 hours per day (maximum 8 hours batch) and very few operators operate more than 18 hours in a day.

Sh. J Chandra Babu, Sc. 'D' informed that the existing standards for stack emissions as stipulated under the Bio-medical Waste (Management & Handling) Rules, 1998 as amended require monitoring of flue gas parameters such as temperature, CO, CO₂ besides compliance to the stack emission norms. He also informed that the amendment dated April 30, 2015 to the EIA Notification dated 14.09.2006 stipulates requirement of 'environmental clearance' for bio-medical waste treatment facilities under the Item 7 (da) Part-B.

The representative of CBWTFs requested to exempt from the installation of continuous online emission monitoring system as EIA Notification dated 14.09.2006 is not applicable to the existing CBWTFs and also considering that as per the proposed (amendment) BMW Rules, all the BMW Incinerators are required to upgrade with the suitable APCD to comply with the proposed emission norms. Regarding treatment charges for bio-medical waste, he informed that wherever land is given on nominal lease basis by the State Governments, the CBWTFs are providing free treatment services to the government hospitals and hence increasing the treatment charges and therefore may not be possible to cover the installation and O & M cost of the monitoring system.

After deliberating, it was felt that because of the following constraints, at present, installation of continuous online monitoring system for particulate matter may not be feasible in case of most of the BMW Incinerators:

- (i) Excluding the start up and shut down time, when higher emissions are expected most of the bio-medical waste treatment facilities are operating the bio-medical waste incinerators effectively only for few hours i.e., (3 to 4 hours);
- (ii) Most of the BMW Incinerators have small stack diameter, because of the stack diameter, installing particulate matter instruments may not be feasible in any stack besides stack may not be very stable and lead to vibration which in turn can cause alignment problem resulting into unstable values;

In view of the above, the following are proposed:

- (i) Installation of continuous online monitoring system for particulate matter and HCl may not be stressed at present for the Common Bio-medical Waste Incinerators subject to the condition that all operators shall *install continuous online emission monitoring system* with the following provision in compliance to the CPCB directions:
 - (i) Analysers for CO_xCO₂
 - (ii) Temperatures of primary & secondary chambers of the incinerator as well as temperature of the stack exit gas; and
 - (iii) Data transmission equipment and linkage with servers of SPCB/PCC and CPCB.

As the revision of BMW Rules is also under consideration, and the revised rules envisage augmenting or retrofitting of the existing APCD by all the bio-medical waste incinerator operators for ensuring compliance to the revised norms to be notified under the Environment (Protection) Act, 1986. The monitoring systems for the relevant parameters may be insisted upon at the later stage.

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