



INDIAN INDUSTRIES ASSOCIATION

BODY OF SMALL & MEDIUM INDUSTRIES

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Ref No. 7B/7648

3 March 09

The Executive Director,
Udyog Bandhu,
12- C, Mall Avenue,
Lucknow

Kind attention: Shri V.K.Seth

Subject: Agenda points for Working Group Meeting of Department of Environment scheduled to be held on 9th March 09

Sir,

We are submitting the following Agenda Points for your kind consideration to be included in the Agenda the Environment Working Group Meeting scheduled to be held on 9th March 09 :-

1. Consultancy Services by Pollution Control Board for Setting up ETP by Micro & Small Industries.

It has been observed Micro & Small Entrepreneurs in the State are facing lot of problems in locating competent consultant for designing & setting up ETP's. At times it happens that the Micro & Small Entrepreneurs get the ETP's setup with the consultation of Private Consultants which do not meet the requirements of UP PCB. The Private Consultants generally demand heavy consultation fees which is also beyond the paying capacity of the Micro & Small Entrepreneurs.

It is therefore proposed that UP PCB may setup a consultancy cell exclusively for Micro & Small Industries which may provide the consultancy for the design and construction of ETP at a nominal cost. If agreed in principle, IIA is ready to co-operate with UP PCB through our Chapters in almost all the districts in U.P.

2. Hazardous Waste Treatment, Storage & Disposal facility (TSDF) at Kanpur

Vide IIA letter no. 55/7321 dated 21 May 08 we submitted few issues effecting the industry (mainly the Small Scale Industries in the State) along with our proposals to the Principal Secretary Department of Environment, Govt of U.P for kind consideration. Copy of the letter is attached herewith.

It is requested that the issues/problems and IIA Proposals as stated in our letter of 21st May 08 may kindly be taken up in the Working Group Meeting on 9th March 09 for suitable decision.

Thanking you

Yours truly,

D.S. Verma
Executive Director

To,
The Principal Secretary,
Department of Environment,
Govt. of U.P.
Lucknow

Subject: Hazardous Waste Treatment, Storage & Disposal Facility (TSDF) at Kanpur.

Sir,

We would like to compliment the efforts of the State Government and U.P, Waste Management Project to setup Hazardous Waste Treatment, Storage & Disposal Facility (TSDF) at Kanpur. However there are few issues affecting the industry and thus may kindly be looked into at Government level, which are as follow :-

- 1) One such TSDF would not be sufficient as well as feasible for entire state, that too in a state like U.P. Transport charges for such a distance facility shall be exorbitant for industries in general, and SMEs in particular.
- 2) We were informed that one such TSDF was also awarded in Meerut-Ghaziabad area to address the requirement of industries in western U.P. This site may be made operational as quickly as possible and till that time industry be allowed to continue with existing arrangements.
- 3) M/s U.P. Waste Management Project Kanpur in a communication to one of IIA Member have stated that “It is mandatory to take their membership for all the hazardous waste generating industry as per clause-20 of the Hazardous Waste (Management & Handling) Rules 1989 and 2003 as amended. The Membership fee for Small industries varies from Rs. 50,000 to Rs. 1,50,000. This fee is applicable apart from the expenses towards analysis of the samples, transport and waste disposal. Copy of the letter addressed to M/s Chakardhar Chemicals, Muzaffarnagar(An IIA Member) is enclosed for ready reference.
- 4) Clause-20 of the Hazardous waste (Management & Handling) Rule 1989 and 2003 as amended States as under :-

Responsibility of Waste Generator :-

- (i) No owner or occupier generating non-ferrous metal waste specified in Schedule 4 or generating used oil or waste oil of ten tons or more per annum shall sell or auction such non-ferrous metal wastes, used oil or waste oil except to a registered re-refiner or recycler, as the case may be, who undertakes to re-refine or recycle the waste within the period of validity of his certificate of registration.
- (ii) Any waste oil which does not meet the specifications laid down in Schedule 6 shall not be auctioned or sold but shall be disposed of in hazardous wastes incinerator installed with air pollution control devices and meeting emission standards.
- (iii) The persons generating waste or auctioneers shall ensure that at the time of auction or sale, the period of validity of the certificate of registration of the registered re-refiner or recycler is sufficient to reprocess the quantity of wastes being sold or auctioned to him.
- (iv) The waste generators and auctioneers shall ensure that the wastes are not allowed to be stored for more than ninety days and shall maintain a record of

auctions and sale of such wastes and make these records available to the State Pollution Control Board or Committee for inspections.

(v) The waste generators and auctioneers shall file annual returns of auction and sale in Form-13 latest by 31st day of January of every year to the respective State Pollution Control Board or Committee.

- 5) As per clause-20 reproduced at 4 above, it is not mandatory for the hazardous waste generating industries to take membership of M/s U.P. Waste Management Project and neither it is feasible for Small Scale Industries to spend such a heavy amount for the membership. We also do not find any reason for the industry to become a member because the services being provided are purely commercial where industry is being charged for each unit of hazardous waste disposal. As such industry should not be compelled to become the member.
- 6) It reveals from the letter enclosed that waste disposal charges are to be decided by a Steering Committee. We propose that the Steering Committee may have the representation of user organisation such as IIA in order to make charges more rational.

We hope, you will be kind enough to consider our proposals and convene a meeting of all concerned to explain their view points for taking a final decision at your end.

Thanking you,

Yours truly,

D.S. Verma
Executive Director