AGENDA ITEMS FOR 85th MEETING OF THE TECHNICAL REVIEW COMMITTEE (TRC)

Dated: 12th March, 2024
Time: 2:00 PM - 4:00 PM
Venue: Through Video Conferencing (VC)

Agenda.1. Gold recovered from exported Printed Circuit Boards (PCBs) to be considered for generation of EPR Certificates under E-Waste (Management) Rules, 2022 - matter referred by the Central Pollution Control Board -reg.

CPCB informed that Steering Committee constituted under E-Waste (Management) Rules, 2022 in its meeting held on 26.10.2023 discussed the issue of consideration of EPR Certificate for gold generated from exported printed Circuit Boards (PCBs) raised by the recycler's associations. Extract of relevant part of minutes of Steering Committee are as under:

- Material Recycling Association of India (MRAI) & Recycling and Environment Industry Association of India (REAI) made joint submission w.r.t consideration of exported PCBs for generation of EPR certificates. As per the Recyclers Associations due to better recovery & profits and limited capability of gold recyclers in the country, PCBs are getting exported on the basis of NOC issued by MoEF&CC. For the fulfillment of gold obligations, Recyclers Associations requested for considering PCB recycling done in the foreign land and crediting of corresponding EPR certificates into the account of recyclers based on supporting documents such as export bills, recovery of foreign currency etc.
- As per the committee, generation of EPR credits on exported PCBs will hinder the growth of gold recycling infrastructure in the country. Also CPCB has taken into consideration limitation of gold recycling while developing framework for generation of EPR certificates and have made provisions accordingly.
- It was decided that CPCB will forward above request of recyclers associations to MoEF&CC for decision on the same.

2. In view of the above, CPCB has requested Ministry for consideration of the issue of generation of EPR Certificate from exported PCBs and give direction to CPCB for further action in this regard.

3. The same has been examined in the Ministry and decided to refer the matter to TRC for deliberation/decision.

TRC in its 84th TRC meeting after detailed discussion/deliberation upon the issue recommended that CPCB may provide the details the actual achievement of the different producers in gold recovery, the quantities handled by the different recyclers, their plans for expansion of capacity may first be ascertained. Further, the views of recyclers and select producers may also be obtained.

CPCB has provided the requisite information. Accordingly, the matter is placed before the TRC for deliberation/decision.

Agenda.2. Request to import 30,000 MT of waste tires for their upcoming plant at Varle, Mahrashatra in the FY 2024-25 by M/s Tinna Rubber and Infrastructure Limited.

M/s Tinna Rubber and Infrastructure Limited vide letter dated 29.01.2024 requested Ministry to grant approval for import of 30,000 MT of waste tires for the FY 2024-25 for their upcoming plant at Varle, Maharashtra. Applicant has further stated in their letter that right now they have obtained CTE and in process to obtain CTO within few days.

2. M/s Tinna Rubber and Infrastructure Limited has informed that their greenfield plant is situated in village Varle, Taluka Wada, Dist. Palghar, Maharashtra, and having capacity to process 60,000 tons of old used passenger car tires annually. Applicant further informed that this plant is an extension of their existing plant located in same area, just 5 km away. The investment of over Rs. 50 Crores in this new establishment is crucial to meet growing production demands and maintain our commitment to the circular economy. They have taken a funding of Rs 25.45 Crores from SBI (copy attached for reference) and the balance funding has been done from other sources. With state-of-the-art technology, the goal is to provide materials for the production of a wide range of products. These include tires, conveyor belts, rubber mats, insulation, brake pads, sports turf, auto components, and roads, all made using recycled materials. Our vision is to create a sustainable and eco-friendly future, revolutionizing tire recycling and promoting responsible waste management practices. The plant for material recycling is with full automation and zero discharge. Point wise responses to the Ministry's queries are as under:

3. M/s Tinna Rubber and Infrastructure Limited has further stated that in this state-of-the-art plant, they propose to process tires to produce steel-free crumb rubber, which will be further utilized to create crumb rubber modifiers for roads and various other applications. The recovered steel flakes will be sold to the industry, and the generated fiber will be processed in-house to produce Nylon 6 compound. Economic Benefits Include:

i. The recycling unit will create direct employment opportunities for over 750 people.
ii. By utilizing recycled materials, we contribute to saving foreign exchange reserves. The raw materials we make are substitutes for higher value imports like bitumen and natural rubber.
iii. Our process adds value of up to 4-5X to recycled materials, enhancing their utility and marketability.
iv. The high-quality recycled products have significant potential for export markets, contributing to economic growth and trade. Also, our recycled rubber is extensively used by various industries employing tens of thousands of people making rubber products for exports. Adding our products increases their competitiveness and enables them to compete with other origins like China, Thailand and Vietnam. A classic example of this is the rubber matting industry based in Kerala.

4. The same has been examined in the Ministry noted that as per the existing practice in case of application for import of waste tyre/rubber, the applicants who have started operation recently or have not been able to carry out production, an adhoc quantity of 1,500

MT of waste tyre/rubber is recommended. In view, it has been decided to refer the matter to TRC for deliberation/ decision.

Agenda.3. Consideration of Hydrochloric Acid as by-product/ co- product as per the provisions of Hazardous & Other Waste Rules, 2016

i. Request for consideration of Hydrochloric Acid (HCL with purity 32 % and above) (Category: Schedule –II (B 15)) as by-product produced from consented/permitted Benzyl products i.e. Benzyl Chloride, Benzaldehyde and Benzyl Alcohol - M/s KLJ Organics Limited (Unit II), Jhagadia, Gujarat

M/s KLJ Organics Limited, Jhagadia, Gujarat has requested for consideration of Hydrochloric Acid (HCL with purity 32 % and above) (Category: Schedule –II (B 15)) as by- product from Benzyl products i.e. Benzyl Chloride, Benzaldehyde and Benzyl Alcohol.

They have mentioned that in Environment Clearance (EC) and Consent to Establish (CTE), HCL produces having purity 32% and above were obtained as By Product /Co-product from Product Benzyl Chloride, Benzaldehyde & Benzyl Alcohol but in subsequent CC&A Amendment it is produced as Hazardous Waste. They have submitted the following documents:

- Equipment /technology available to get HCL with Purity 32% and above Analysis Reports for said purity of HCL issued by NABL and MoEFCC approved laboratory
- Certificate issued by Institute of Chemical Technology (Mumbai) stating that produced HCL (32% and above) by M/s KLJ Organic Limited (Unit II) is not falling under Hazardous waste category in Schedule I, III. IV & VI of Hazardous & Other Waste (Management & Trans Boundary Movement) Rules, 2016 and it is a By- Product.
- List of End users to whom the HCL is to be supplied along with MoU

ii. Request for consideration of Hydrochloric Acid as by-product produced from manufacturing process of Benzo Trichloride (BTC) & Vinylidene Difluoride (VDF) - M/s Gujarat Fluorochemicals Limited, Bharuch, Gujarat

The applicant has mentioned that HCL produced during the manufacturing process are not hazardous but SPCB recognized HCL as hazardous waste due to which their supplies to end user industries are getting badly affected due to protocol for these industries to not to use any hazardous waste in their process and the high economy loss is tuned. They have further requested to consider the HCL as by-product.

iii. Request for consideration of Hydrochloric Acid as by-product produced from manufacturing process of R-22 & R -142b - M/s Gujarat Fluorochemicals Limited, Panchmahal, Gujarat

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which their supplies to end user industries are getting badly affected due to protocol for these industries to not to use any hazardous waste in their process and the high economy loss is tuned. They have further requested to consider the HCL as by-product.

The matter was discussed in 81st TRC and the committee recommended CPCB may be requested to prepare analysis report in respect of each case which includes Characteristics of waste & how it is different from Chlorinated Paraffin Wax (CPW). CPCB will also verify the extent of contamination coming from the organic process/residue and give a report. Till then the matter is deferred.

CPCB has provided the requisite information. Accordingly, the matter is placed before the TRC for deliberation/decision.

Agenda.4. Consideration of Hydrochloric Acid generated from manufacturing of Monochloroacetic acid (MCA) as product/ by-product/ co- product as per the provisions of Hazardous & Other Waste Rules, 2016 by M/s Anaven LLP, Valsad, Gujarat.

M/s Anaven LLP, a joint venture company of Atul and Nouryon (erstwhile known as Akzonobel), Netherland is the largest manufacturer of Monochloroacetic acid (MCA) in India. The Company manufactures MCA using Nouryon's state-of-the-art proprietary technology involving the reaction of acetic acid with chlorine. MCA is presently imported largely from China and it is used for manufacturing of pharmaceuticals like Ibuprofen, agrochemicals, liquid soaps, detergent and other cleaning products.

2. The plant is having valid Environment Clearance (EC) no. J-11011|286|2018 |IA II (I) dated August 11, 2020 and valid Consent to Operate (CTO) no. AWH 119535 dated July 27, 2022. Later we also received an EC EC22A021GJ120716 dated December 03, 2022 and subsequently CTO amendment no. WH 131858 respectively for the expansion in the capacity from 32,000 TPA to 38,400 TPA. MoEFCC has given HCl as a product in both the ECs granted. Also the analysis report in this regard from NABL and MoEF certified laboratories are provided by the applicant.

3. Despite all the above approvals and documents submitted to GPCB for consideration of Hydrochloric Acid generated from manufacturing of Monochloroacetic acid (MCA) as product/ by-product/ co- product as per the provisions of Hazardous & Other Waste Rules, 2016, GPCB granted HCl as a waste making whole predicated business calculations wrong as it cannot be sold in open market neither can be export though company invested Rs. 4.5 Cr for the purification of HCl. This investment apart from the recurring cost is in vein.

4. GPCB are additionally asking for the recommendation letter issued from the HSM division to consider HCl as a product. Therefore, applicant requested Ministry to consider the same for decision.

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