

AGENDA ITEMS FOR 76th MEETING OF THE TECHNICAL REVIEW COMMITTEE
(TRC)

Dated: 24th January, 2023

Time: 2:30 PM onwards

Venue: Through Video Conferencing (VC)

AGENDA No. 1. Clarification with respect to Hazardous and other Wastes (Management & Trans-boundary Movement) Rules, 2016

Agenda 1.1 Use of Crumb Rubber recovered from waste tyres for building Green Roads by Material Recycling Association of India (MRAI)

MRAI has mentioned that the usage of CRMB material in road construction would also ensure safer and superior roads with more cost-effectiveness. It is also stated that major institutes like CRRI, and HRS-Chennai, IIT's have done extensive research which confirms that roads made with CRMB will last longer, reduce noise pollution, help in increasing axle load ability, and in the process create a very safe and efficient use of waste tyres, that would otherwise be used in illegal and polluting applications like pyrolysis.

IRC 37:2018 (relevant pages enclosed) recommends the use of modified bitumen only for highways handling traffic 50 MSA and above while considering the merits of Modified bitumen, it should be used for other types of roads as well. The directions may also be issued by MOEFCC to make a minimum of 30% of roads with CRMB

It was considered in 75th meeting of TRC held on 17.11.2022 and the committee decided to discuss these matter in the next TRC meeting.

Agenda 1.2 Representation from M/s Finster Black Private Ltd regarding grant of permission of import of 50,000 MT per annum of Used tyre scrap in baled/multicut form for a period of 10 years for manufacturing of Recovered Carbon Black.

M/s Finster Black Private Ltd has mentioned that currently India produces 16,00,000 tonnes of Virgin Carbon Black using CBFS carbon black feedstock (crude based oil) & pitch oil. This contributes more than 2 tons of CO₂ emitted to the atmosphere for every ton produced. CBFS is imported in the country. 90% of the virgin carbon black produced goes for the manufacturing of rubber tyres and rubber products. Around the world countries have started promoting recovered carbon black as a substitute of virgin carbon black and save the environment. Recovered carbon black is produced by using rubber and tyre scrap as a raw material. NITI Aayog in its report on rubber and tyre scrap recycling has promoted the use of Recovered carbon black.

Further, it is mentioned by the applicant that Indian local tyre scrap is available in a limited way and quality of scrap is not good because of the multiple reuse and high ash content. In view of this and in order to kick start the recovered carbon black industry, M/s Finster Black Private Ltd has requested to grant of permission of import of 50,000 MT per annum of Used tyre scrap in baled/multicut form for a period of 10 years

It was last considered in 75th TRC meeting held on 17.11.2022 and after detailed deliberation, TRC is of the opinion that the more clarification in terms of process details, material balance and disposal of by-product is required. The applicant may be requested to make a detailed presentation along in next meeting incorporating above issues. The matter will be reconsidered by the TRC in forthcoming meeting.

Agenda 1.3 Request to acknowledging de-lined Copper Inserted Cathode Bars (CICBs) non-hazardous under category 3D of Basel Convention and necessitating State Pollution Board to issue necessary approval and allow to import these CICBs – Tata International Limited

Tata International Limited (PAI) Division supplies Cathode bars, Anode bars and Copper inserted cathode bars (CIBs) to Aluminium Smelters across Oceania, Asia, middle East, Africa, Europe and North America. TATA supplies more than 60,000 MT Cathode bars, Anode bars and Copper inserted cathode bars (CIBs) annually from India. Tata International Limited (PAI) Division want to recover the precious metal copper along with steel scrap (HMS) from spent steel bars. The process to extract is purely mechanical using operation of saw cutting and Gas cutting, and no Thermo - Chemical process is involved. The material extracted shall also remain in solid state in nature and would not change.

TATA has mentioned that an authorization has been issued to M/s Aditya Aluminum Limited by PCB, Odisha for similar processing as the used collectors bars are not considered in the list of hazardous items. Since, there was precedence, TATA requested Andhra Pradesh Pollution Control Board for seeking clarification and NOC w.r.t. importing the scrap bars along with report of Schedule II test result from NABL accredited laboratory.

TATE also requested CPCB for approval of issuance of CFE for recovery of copper from used cathode bars and acknowledging de-lined CICBS as Non Hazardous. APPCB cited the clarification of CPCB and specific approval of MoEF&CC for import of copper inserted bars along with chemical composition of surface of the spent bars. In this regards a test report by SV Enviro Lab (recognized by MoEF&CC, accredited by NABET and NABL) on all the possible toxic elements & other heavy metals via TCLP was found to be within the PCB/ LPCBs standards.

APPCB has direct to M/s Hayagreevaya Enterprises (Tata's external processing agent) that in case of dispute the matter has been referred to TRC constituted by MoEF&CC. CPCB also asked M/s Hayagreevaya Enterprises to submit schedule I report for the Used CICB's. Though Tata International Limited submitted an application in July, 2022 to MoEF&CC clarifying that these Bars are metal scrap (Steel and Copper) does not require Schedule testing & in this regard Schedule II test report is being submitted.

The schedule II test report submitted by NABL Accredited Varsha Bullion & Elemental Analab, SV Enviro Lab, Vishakhapatnam & report from Andhra University confirms that the material is non-hazardous in nature.

In this regard, Tata International Limited has requested to kindly for de-lined Copper Inserted Cathode Bars (CICBs) as non-hazardous under category 3D of Basel Convention and direct State Pollution Control Board to issue necessary approval.

The matter was discussed in 75th meeting of TRC held on 17.11.2022. After detailed deliberation, TRC recommended a detailed presentation may be given by TATA International Limited. Committee also clarifying the difference between the category given in the authorization issued to M/s Aditya Aluminum Limited by PCB, Odisha and applied by TATA International Limited to PCB Andhra Pradesh. The matter will be reconsidered by the TRC in forthcoming meeting.

Agenda 1.4 Regarding Consent on Notification Procedure for Import of Aluminium Wine Caps from Synergy Tradeco NV Belgium to M/s Swift Strips India Pvt. Ltd., India by Synergy Tradeco

The material under consideration is 'Aluminium wine caps' which is collected in Europe by a supplier named Stenofer, Willebroek, Belgium. This material contains above 95% of Aluminium and rest material is impurities containing mainly glass, oxidised dust, very few plastic or rubber pieces etc. The test/analysis reports of the subject material in India as well as in Belgium is also provided.

This material is being imported into India regularly by Swift Strips India Pvt Ltd from different countries i.e, Netherlands, UK and also from Belgium in past under Basel code B1010.(Copy of the Bill of Lading, Bill of Entry for import into India and other relevant doc with some photos is also given)

As per the inspectors of Belgium Environment Authorities (i.e. OVAM) who had a physical inspection of material and give his opinion that this material contains a high non mantellic part, so they considered it as 'Non Listed' material in the Basel convention and suggested to follow a notification Procedure for this particular shipment of 1000 MT from Belgium to India to our customer Swift Strips Pvt Ltd. Accordingly, Belgian authorities send a email for prior consent to ship this material to India to the customer Swift Strips Pvt Ltd. The Belgium Authorities require your prior consent in Box 20 of the notification document BE0001012649 also sent along in the document including the English translation of this notification document.

In this regard, Synergy Tradeco NV has requested to kindly consider the above item under B1010 and issue necessary approval and consent.

Agenda 1.5 Request to allow import of washed PET Flakes (made from waste PET bottles) to actual Pet bottles recyclers who are manufacturing recycle polyester staple fiber (PSF) and Polyester Filament Yarn (P.O.Y & P.F.Y.) where production in

the year 2020-21 & 2021-22 is less than 70% of the consented capacity by M/s All India Recyclable Fibre & Yarn (AIRFY).

TRC in its 73rd Meeting has recommended the following :

- i. A unit should be eligible for import only if it has used domestic waste to the extent at least 70% of the capacity in the previous year (e.g. production of 2021-22 to be considered for 2022-23 permissions).
- ii. The imports for the year 2022-23 should be restricted to 20% of the production in the year 2021-22 and thereafter, 15% of the actual capacity utilised in the preceding year.
- iii. An additional import up to 10% may be considered against exports of the products.
- iv. Units would be eligible for import after at least one year of production.
- v. The decision may be reviewed after 1 year for continuation of import of PET Flakes.

Thereafter, based on the decision of TRC, in 116th meeting of Expert Committee held on 24th August, 2022, EC considered the applications for revision and one of the recommendation was *Cases where production of the unit(s) in the year 2020-21 or in 2021-22 is less than 70% of the consented capacity, the criteria would be put up before TRC for reconsideration and then these cases will be put up before EC.*

AIRFY has mentioned that due to COVID restrictions and shortage of raw materials during year 2020-21 and 2021-22, some of the recyclers were not able to utilize more than 70% of the consented capacity. However, in current year i.e. 2022-23 (in first 6 months from April to September), the capacity utilization of these units is more than 70%.

In view of the above, AIRFY had requested to relax the condition of 70% utilization and consider their application for permission to import PET Flakes.

Agenda 1.6. Transportation of Spent Catalyst through non-Hazardous Waste Vehicles by M/s Hindustan Platinum Private Limited, Navi Mumbai, Maharashtra.

M/s Hindustan Platinum Private Limited, Mumbai, Maharashtra has mentioned that while getting the Hazardous Waste authorized vehicle for movement of Spent Catalyst (Precious Metals based) from all over India to their plant in Navi Mumbai, they are facing many issues which are as follows:

- It is very difficult to find out Hazardous Waste transporter in any state for intrastate movement. The situation becomes worse and extremely painful to manage in case of interstate movement because the number of transporters in this category are almost negligible.
- With a lot of effort and difficulty even if succeed in getting Hazardous Waste authorised transporter, they charge an unaffordable high cost. The situation is so bad that the transporter asks for 5 to 6 times more freight as compared to the normal vehicle.

- There is high level of unionisation in this category of vehicles therefore they are forced to use only these vehicles and pay hefty cost which in some cases can go up to even ten times, then too the vehicles are not available on time.
- Due to the transportation issue Spent Catalyst which they buy or take for job work after spending hundreds of crore rupees get stuck for one to two months that leads to very heavy cost in interest and at times even loss of business.

Further, the applicant has submitted Toxicity Characteristic Leaching Procedure (TCLP) report for various Catalysts which clearly shows that there is no hazardous material present in the catalyst that they process. They have also submitted the Consent from Maharashtra Pollution Control Board, authorization from Maharashtra Pollution Control Board as per Rule 9 and CPCB Conditional permission for utilization of Hazardous Wastes & Capacity Enhancement under Rule 9 of HOWH rule, 2016.

In view of the above, the applicant has requested to allow them to use the non-Hazardous Waste vehicle for Spent Catalyst movement if the material analysis report falls in non-hazardous waste.

Agenda 2. Any other item(s) with permission of the chair.
