



SPEED POST

AQM/AP/2019-20/

October 09, 2019

Principal Secretary, Environment
Govt. of Maharashtra
Environment Department
Maharashtra Mantralaya
Mumbai – 400032

Sub.: Directions under Section 31A of The Air (Prevention and Control of Pollution) Act, 1981 regarding preparation of action plans for non-attainment cities as per Hon'ble NGT order dated 08-10-2018-reg.

WHEREAS, under Section 16 (2) (b) (d) (g) and (j) of The Air (Prevention and Control of Pollution) Act, 1981, mandates Central Pollution Control Board (hereinafter referred as CPCB) to execute nation-wide programme, provide technical assistance and guidance to the State Boards for prevention, control or abatement of air pollution; collect, compile and publish technical and statistical data relating to air pollution control and abatement of air pollution and perform such other functions as may be prescribed;

WHEREAS, air pollution particularly PM₁₀ and PM_{2.5} has emerged as a major health concern in most of the cities & towns, with air quality reaching to alarming levels;

WHEREAS, based on the data for the period 2011–2015 and WHO report 2014/2018, 102 cities failed to meet the prescribed standards are identified as non-attainment cities;

WHEREAS, seven regional workshops were organized to sensitize SPCBs and Stakeholders to develop city specific action plan for control of air pollution in these non-attainment cities;

WHEREAS, in pursuant to Hon'ble National Green Tribunal order dated 08-10-2018, all the States and Union Territories with non-attainment cities were required to constitute Air Quality Monitoring Committee (AQMC), and AQMCs to prepare appropriate action plans within two months aimed at bringing the standards of air quality within the prescribed norms within six months from date of finalization of the action plans;

WHEREAS, as per order of Hon'ble National Green Tribunal, a three member committee shall examine the Action Plans and on the recommendations of the said Committee, the Chairman, CPCB shall approve the same by 31.01.2019;

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WHEREAS, the plans received till January 23, 2019, was examined by three member committee on 24-25 January, 2019, and compliance report submitted to Hon'ble NGT on February 15, 2019;

WHEREAS, the city action plans of Mumbai, Nashik and Solapur received on 28-02-2019, were not approved by the committee and accordingly direction was issued to Principal Secretary, Environment on 16-04-2019;

WHEREAS, the revised city action plans of Mumbai, Nashik and Solapur received on 24-04-2019, were not approved by the committee and accordingly direction was issued to Principal Secretary, Environment on 25-06-2019;

WHEREAS, the second revised city action plans of Mumbai, Nashik and Solapur received on 09-07-2019, were not approved by the committee and accordingly D.O. letter was send to Chairman, Maharashtra Pollution Control Board on 02-09-2019;

WHEREAS, third revised city action plans for Mumbai, Nashik, and Solapur were submitted to CPCB on 27-09-2019;

WHEREAS, the three member committee examined the revised city plans of Mumbai, Nashik, and Solapur on October 01, 2019 and recommendations of committee is placed at Annexure-I and Annexure-II;

WHEREAS, based on the recommendations of the three member committee, Chairman, CPCB has approved the city plans for Mumbai, Nashik, and Solapur along with the recommendations enclosed at Annexure-I, for ground implementation with immediate effect;

Now, therefore, in exercise of powers under Section 31 A of The Air (Prevention and Control of Pollution) Act, 1981, you are directed to implement the city action plan and submit progress report of the same to CPCB on quarterly basis;

Receipt of this direction shall be acknowledged immediately and action taken shall be communicated to CPCB within 07 days.



(S. P. S. Parihar)
Chairman



Annexure – I

- State: Maharashtra
- City: Mumbai (Third Revised Plan)
- Plan received on date: 27-09-2019

Key Component	Action plan dated 28-02-2019		Revised action plan dated 24-04-2019	Second Revised action plan dated 09-07-2019	Third Revised action plan dated 27-09-2019
	Observations	Remarks			
Air Quality Monitoring Network	Expansion plan not provided	Include monitoring network	Included	-	-
Source Identification	Road Vehicles, Burning, Construction Activities, Industries, Domestic Fuel	Major sources identified except Large Industries (e.g. Oil Refineries and Fertilizer units)	Included	-	-
Source Apportionment (SA) and Emission Inventory (EI)	EI & SA not quantified	Carryout EI & SA estimates	Included	-	-
Action Points	Addresses all major sources	Action plan to address Large Industries (e.g. Oil Refineries and Fertilizer units)	<ul style="list-style-type: none"> The plan provides general information for most of the action points and lacks specific action plan related to source group. The detail comments are at Annexure I(b). 	Plan to be revised as per comments of the committee. The detail comments are at Annexure B	Included
Long-term Strategy	Long-term actions proposed	-	-	-	-
Timeframe	Timelines proposed for various actions (up to three years)	-	<ul style="list-style-type: none"> Timelines proposed for various actions (up to fifteen years) Specify time period for Long/Mid/Short term measures Most of the action point lacks time targets. The detail comments are at Annexure I(b). 	Plan to be revised as per comments of the committee. The detail comments are at Annexure B	Timelines proposed for various actions (up to three years, for one action its from twelve – fifteen years)
Executing Agencies	Not Identified	Identify executing agencies in Section – 2 (Page No. 6-17)	Identify appropriate executive agencies in Section 4 - SCS-1 to SCS-3, SCS-5, SCS-6, SCS-8 and SCS-9	-	Included

Public Awareness and Complaint Redressal Mechanism	Specific plans and public complaints redressal mechanism not outlined	Detail proposal to be worked out	Included	-	-
Budget Support	Not given	Broad estimates be made for financial layout	Provided	-	-
Comments for improvement	<ul style="list-style-type: none"> In continuous long term activities, installation of respective required facilities should be done within 6 months, with continuous monitoring. C&D activities point no. (i) & (ii) should be within 6 months. Clarify Point no. 9-(2): It may be reviewed as it seems to be an information not action point. 				
Overall Recommendation	Recommended with revisions (See comments on revised plan including comments for improvement).				

- State: Maharashtra
- City: Nashik (Third Revised Plan)
- Plan received on date: 27-09-2019

Key Component	Action plan dated 28-02-2019		Revised action plan dated 24-04-2019	Second Revised action plan dated 07-2019	Third Revised action plan dated 27-09-2019
	Observations	Remarks			
Air Quality Monitoring Network	Existing and expansion plan proposed	CAAQMS not as per Guidelines	CAAQMS not as per Guidelines (see attached)	-	-
Source Identification	Road Dust, Vehicles, Open Burning, Construction Activities, Industries, Thermal Power Plant, Domestic Fuel	-	Major sources identified except Domestic Fuel	-	-
Source Apportionment (SA) and Emission Inventory (EI)	EI & SA not quantified	Carryout EI & SA estimates	Included	-	-
Action Points	Addresses all major sources except Thermal Power Plant	Action plan to address emissions from Thermal Power Plant	<ul style="list-style-type: none"> • Prepare action plan for Domestic Fuel and Thermal Power Plant. • The plan provides general information for most of the action points and lacks specific action plan related to source group. The detail comments are at Annexure I(b). 	Plan to be revised as per comments of the committee. The detail comments are at Annexure B	Actions to deal with domestic fuel emissions need to be incorporated.
Long-term Strategy	Not addressed	Long term measures for public transport, Road dust, Biomass burning, C&D activities etc. should be included	Included	-	-
Timeframe	Not addressed	Include long term measures for relevant sources	Timelines proposed for various actions (up to four years)	Plan to be revised as per comments of the committee. The detail comments are at Annexure B	<ul style="list-style-type: none"> • Timelines proposed for various actions (up to four years)
Executing Agencies	Identified	-	-	-	-

Public Awareness and Complaint Redressal Mechanism	Specific public redressal mechanism outlined.	-	-	-	Specific plans and public redressal mechanism need to be incorporated.
Budget Support	Not given	Broad estimates made for financial layout	Broad estimates be provided	-	-
Comments for improvement	<ul style="list-style-type: none"> • In continuous long term activities, installation of respective required facilities should be done within 6 months, with continuous monitoring. • Some of the short term actions exceeding 6 month implementation period should targeted upto 6 months (e.g. Vehicle point IX & X, Resuspension point III). • Point no. 9 –(iii) of “communication plan for air quality” should be completed in three months or before Dec-2019. • Time target for Source apportionment study should be provided. 				
Overall Recommendation	Recommended with revisions (See comments on revised plan including comments for improvement).				

- State: Maharashtra
- City: Solapur (Third Revised Plan)
- Plan received on date: 27-09-2019

Key Component	Action plan dated 28-02-2019		Revised action plan dated 24-04-2019	Second Revised action plan dated 09-07-2019	Third Revised action plan dated 27-09-2019
	Observations	Remarks			
Air Quality Monitoring Network	The plan is not properly prepared and provides list and status of actions.	Plan needs to be re-done and submitted as per the format addressing key components.	Included	-	-
Source Identification			Included	-	-
Source Apportionment (SA) and Emission Inventory (EI)			Included	-	-
Action Points		<ul style="list-style-type: none"> The plan provides general information for most of the action points and lacks specific action plan related to source group. The detail comments are at Annexure I(b). 	Plan to be revised as per comments of the committee. The detail comments are at Annexure B.	-	
Long-term Strategy		Included	-	-	
Timeframe		<ul style="list-style-type: none"> Timelines proposed for various actions (up to five years). Short-term measures (less than 6 months) need to be addressed. The detail comments are at Annexure I(b). 	Plan to be revised as per comments of the committee. The detail comments are at Annexure B.	-	
Executing Agencies		Included	-	-	
Public Awareness and Complaint Redressal Mechanism		Detail proposal to be worked out	-	Specific plans and public complaints redressal mechanism need to be incorporated.	
Budget Support		Provided	-	-	
Comments for improvement	<ul style="list-style-type: none"> In continuous long term activities, installation of respective required facilities should be done within 6 months, with continuous monitoring. Some of the short term actions exceeding 6 month implementation period should targeted upto 6 months (e.g. Vehicle point 3, industry point 1, C&D point 2). 				
Overall Recommendation	Recommended with revisions (See comments on revised plan including comments for improvement).				

General observations made by three member committee for further improvements in the plans:

1. Emission Inventory , Source Apportionment and Carrying Capacity Assessment: Vehicular Pollution, Industrial Emissions, Population Density, Construction Activities

The AQMCs should duly address the above issues so that the cities remain air quality compliant in future and some activities, if required, are restricted in future planning. It is expected the knowledge from EI, SA and carrying capacity assessment will upgrade the action plans.

2. Interim Emission Reduction Targets

The plans should include auditable and verifiable interim emission reduction targets. This will ensure continuous and timely implementation of actions.

3. Challenges in Implementation: Role of Central Agencies

Some actions proposed in the plans (e.g. supply of CNG or PNG) will require coordination and commitment from Central agencies. It is desirable that such actions are discussed with concerned agencies for effective implementation.

4. Consideration to Graded Response Action Plan (GRAP)

The GRAP is an important contingency plan in NCR. The SPCBs may give due consideration to the GRAP and develop a suitable plan relevant to the emissions in the city and likelihood of their impact on air quality.

5. District Level Monitoring Committee

Besides AQMC, a monitoring committee headed by the Municipal Commissioner or District Magistrate comprising senior officers from concerned departments may be considered to review the progress and ensure smooth implementation of the plan.