



SPEED POST

AQM/AP/2019-20/

January 23, 2020

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;

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WHEREAS, 20 additional non-attainment cities has been identified based on data for the period 2014-2018;

WHEREAS, Hon'ble National Green Tribunal order dated 06-08-2019, directed concerned SPCBs to prepare city action plans for 20 newly added Non-attainment cities and submit to CPCB within two months;

WHEREAS, city action plans for 17 non-attainment cities of Maharashtra was already approved for implementation on 16-04-2019, 25-06-2019 and 09-10-2019;

WHEREAS, the city action plan for one newly added non-attainment city of Maharashtra was submitted to CPCB on 27-09-2019;

WHEREAS, the three member committee examined the city plan of Thane on January 14, 2020 and recommendations of committee are placed at Annexure-I and Annexure-II;

WHEREAS, in view of recommendations of the three member committee, Competent Authority has not approved the city action plan for aforesaid city in state of Maharashtra;

Now, therefore, in exercise of powers under Section 31 A of The Air (Prevention and Control of Pollution) Act, 1981, you are directed to submit revised city action plan for Thane keeping in view recommendation made as per Annexure-I at the earliest;

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


(S. P. S. Parihar)
Chairman

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- **State:** Maharashtra
- **City:** Thane
- **Plan received on date:** 27-09-2019

Key Component	Observations	Remarks
Air Quality Monitoring Network	Existing and expansion plan proposed	CAAQMS not as per Guidelines (see attached)
Source Identification	Vehicles, Road Dust, Industries, Construction Activities, Open Burning, Domestic Fuel	-
Source Apportionment (SA) and Emission Inventory (EI)	EI & SA not quantified	Carryout EI & SA estimates
Action Points	Addresses all major sources	The detail comments are at Annexure I(b).
Long-term Strategy	Long-term actions proposed	-
Timeframe	Timelines proposed for various actions (up to five years)	The detail comments are at Annexure I(b).
Executing Agencies	Identified for some actions	Identify executing agencies in Vehicle Emission Point No. 11, 15 & 17, Biomass Burning Point No. 4, DG Sets Point No. 8(ii)
Public Awareness and Complaint Redressal Mechanism	Specific plans and public complaints redressal mechanism outlined	-
Budget Support	Budget estimates given	-
Overall Recommendation	Not recommended. Plan needs to be re-done and submitted as per the format addressing key components (See Remarks).	

Thane**Points related to source group:**

- Vehicle:
 - Identify all traffic congestion points in the city and plan for decongestion
 - Point no. 7, 15, 16, 18, and 25, needs clarification in term of timelines/action planned.
- Industry:
 - Clarify point no. 6
 - Point 4 and 8 repeated
 - Provide timeline for conversion of all industries to APCD
- Mining
 - Specify type of mining in the city
 - Specify type of practices to control air pollution

Timelines:

- In the column “Time target for implementation”, the timeline given should be time of completion of the action.
- The time period Short term actions restricted to 6 months and most of the activities should be completed within three years. Activities requiring more time should be explained with reasoning.
- Timeline for Vehicle point no. 3, restrict to maximum 3 year
- Timeline for Vehicle point no. 4, restrict to maximum December 2021
- Timeline for Vehicle point no. 9, restrict to maximum 2021
- Timeline for Vehicle point no. 10, restrict to maximum 2022
- Timeline for Vehicle point no. 14, restrict to maximum 2021
- Provide time target in Vehicle Emission, Point No. 11, 12, 21 & 22, Biomass Burning Point No. 4, Domestic Fuel Burning Point No. 1 & 2, DG Sets Point No. 8(ii)
- Specify time of completion & Define Short, Mid, and long term in Vehicle point no. 6.
- Time of completion for: Plastic waste to oil conversion plant, C&D waste processing plant, & other waste handling facilities

Other:

- Some of the points are already implemented and not relevant to action plan should be removed.
- Error in Table 14 (total SSI units are 772 and it makes total no of industries 791), based on figure provided.

Air Quality Monitoring network design criteria

Population (Census 2011)	Minimum No. of manual station under NAMP	Minimum no of proposed CAAQMS	Total
1,00,000- < 5,00,000	1-Background 2-Residential/ Commercial	1-Residential	4
5,00,000- <10,00,000	1-Background 2-Residential/ Commercial	1-Residential 1-Traffic dominant area 1- Commercial	6
10,00,000- <50,00,000	1-Background 2-Residential/ Commercial	2-Residential 1-Traffic dominant area 1- Commercial 1-Industrial area	8
≥50,00,000	1-Background in upwind direction 1-Background in down wind direction 2-Residential/ Commercial	4-Residential 3-Traffic dominant area 3- Commercial 2-Industrial area	16

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.