By Registered Post

F. No. B-31011/BMW (20153)/2025/WMD-I/292 April 07,2025

To,

M/s Synergy Waste Management Private Limited,
Subharti Medical College Campus,
Subharti Puram, Meerut,
Uttar Pradesh

DIRECTION UNDER SECTION 5 OF THE ENVIRONMENT (PROTECTION) ACT, 1986 AND SHOW CAUSE NOTICE – FOR NON-COMPLIANCE TO BIOMEDICAL WASTE MANAGEMENT RULES, 2016.

WHEREAS the Central Government has notified the Bio-Medical Waste Management Rules, 2016 and amendments thereof (BMWM Rules, 2016) in supersession of the Bio-Medical Waste (Management & Handling) Rules, 1998, and amendments thereof, under the Environment (Protection) Act, 1986, to improve the collection, segregation, processing, treatment and disposal of the Bio-Medical wastes in an environmentally sound management thereby, reducing the biomedical waste generation and its impact on the environment; and

WHEREAS Rule 5 of BMWM Rules, 2016 stipulate duties of the operator of Common Bio-Medical Waste Treatment Facility (CBWTF) to ensure treatment and disposal of biomedical waste in line with provisions of said Rules; and

WHEREAS as per Rule 7 (1) of BMWM Rules, 2016, the bio-medical waste is required to be treated and disposed of in accordance with Schedule I and in compliance with the standards prescribed in Schedule II of the BMWM Rules, 2016; and

WHEREAS Rule 14 (1) of BMWM Rules, 2016 stipulate that every authorized person is required to maintain records related to generation, collection, segregation, storage, transportation, treatment, disposal and or any form of handling of Bio-Medical waste in accordance with these Rules and guidelines issued by CPCB; and

WHEREAS the Hon'ble National Green Tribunal, in the matter of O.A. No. 710 of 2017 filed by Shailesh Singh vide order dated 12.03.2019 directed "CPCB to undertake study and prepare a scale of compensation to be recovered from violators of Bio-Medical Waste Management Rules, 2016. Hon'ble NGT also directed that scale of compensation must be deterrent, rendering violation of Rules to be non-profitable which should be adequate to remedy the situation"; and

WHEREAS Hon'ble National Green Tribunal in its order dated 15.07.2019 in the matter of O.A. No. 710 of 2017, accepted Guidelines for "Imposition of Environmental Compensation Charges (ECC) against Healthcare Facilities (HCFs) and Common Biomedical Waste Treatment Facilities (CBWTFs)"; and

contd..

WHEREAS the CBWTF namely M/s Synergy Waste Management Private Limited, Subharti Puram, Dist. Meerut, Uttar Pradesh (the Unit) was inspected by Central Pollution Control Board (CPCB) on 24.09.2024 wherein following non-compliances were observed:

i. As per stack emission monitoring results, Particulate Matter concentration (12,237 mg/Nm^3) exceeds the standard of PM (50 mg/Nm^3) prescribed under the BMWM Rules, 2016.
ii. As per analysis results of treated effluent, TSS (548 mg/l), BOD (290 mg/l) and COD (928 mg/l) exceeds the standards of TSS (100 mg/l), BOD (30 mg/l) and COD (250 mg/l) prescribed under the BMWM Rules, 2016.
iii. During inspection, it was observed that the operation and maintenance of Air Pollution Control Devices (APCDs) attached to the incinerator is very poor.
iv. Proper access to the treatment units of Effluent Treatment Plant was not provided by the Unit.
v. Online Continuous Emission Monitoring System (OCEMS) was found operational. However, calibration of OCEMS is not being done as per CPCB guidelines.
vi. The Unit has provided Monitoring platform and ladder for stack monitoring. However, size of monitoring platform was not adequate.
vii. Log book for operation of incinerator, autoclave, shredder and effluent treatment plant was not maintained as per CPCB guidelines.
viii. The Unit has not conducted routine test, validation test and spore test to check efficacy of autoclave as required under BMWM Rules, 2016.
ix. It was observed that the workers engaged in handling of biomedical waste were not equipped with PPE kits and housekeeping was not proper.
x. The Unit has not provided display board outside the factory gate regarding hazardous waste generation from the facility.

WHEREAS as per the CPCB guidelines for "Imposition of Environmental Compensation Charges (ECC) against Healthcare Facilities (HCFs) and Common Biomedical Waste Treatment Facilities (CBWTFs)", the Environment Compensation for above mentioned non-compliances at S. No. i) and ii) have been assessed at the rate of ₹ 8,750/- per day; and

WHEREAS the Central Government vide notification S.O. 730 (E) dated July 10, 2002, has delegated the powers under Section 5 of the Environment (Protection) Act, 1986 to the Chairman, Central Pollution Control Board (CPCB), to issue directions for violation of the standards and rules relating to Biomedical Waste Management notified under the Environment (Protection) Act, 1986; and

NOW THEREFORE in exercise of the powers vested under Section 5 of the Environment (Protection) Act, 1986, the Unit is hereby directed to:

a. Take corrective measures with immediate effect on receipt of this direction and submit action taken report within 15 days from the issue of this direction along with supporting documents & photographs including incinerator stack emission monitoring results from laboratory of SPCB or laboratory recognised under Environment (Protection) Act, 1986; and

contd..

b. Show Cause as to why Environmental Compensation Charges of ₹ 8,750/- per day till the compliance is ensured, should not be imposed for violation of provisions of BMWM Rules, 2016 for the above mentioned non- compliances, as per CPCB guidelines.

In case the Unit found non-complying with above directions, CPCB will be constrained to take appropriate action against M/s Synergy Waste Management Private Limited, Subharti Puram, Dist. Meerut, Uttar Pradesh, as deemed fit under the Environment (Protection) Act, 1986.

(Amandeep Garg)
Chairman

Copy for information to:

1.	The Additional Secretary, HSM Division, Ministry of Environment, Forest & Climate Change, Indira Paryavaran Bhawan, Jorbagh Road, New Delhi – 110003	:	For kind information, please.
2.	The Member Secretary Uttar Pradesh Pollution Control Board, Building No. TC- 12V, Vibhuti Khand, Gomti Nagar, Lucknow-226010	:	For kind information, please.
3.	The Regional Director, The Regional Directorate Central Pollution Control Board Building No. TC- 12V, Vibhuti Khand, Gomti Nagar, Lucknow-226010	:	For kind information, please
4.	I/c IT Division	:	For information and necessary action, please.
5.	I/c Accounts Division	:	For information and necessary action

(Bharat Kumar Sharma)
Member Secretary

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