BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,

Principal Bench, New Delhi

Original Application No. 640/2018

In

(Earlier O. A. No. 22/2013(тнс))

In the matter of: -

Sukhdev Vihar Residents Welfare Association

Versus

Applicant(s)

Respondent(s)

State Of NCT of Delhi

Index

Sr. No.	Particulars	Page No.
1.	Compliance Report of Waste to Energy Plants in Delhi in Original Application No. 640/2018 (Earlier O. A. No. 22/2013(THC)) in the matter of Sukhdev Vihar Residents Welfare Association Vs State Of NCT of Delhi in compliance to the Hon'ble NGT orders dated 09.10.2017 & 27.09.2018 respectively.	
2.	Annexure-I: A copy of Hon'ble NGT orders dated 09.10.2017 & 27.09.2018.	

(Divya Sinha) Scientist-E Central Pollution Control Board, Parivesh Bhawan, East Arjun Nagar, Delhi- 110032.

Date: 22.03.2021 Place: Delhi

Compliance Report of Waste to Energy Plants in Delhi

(Period: September-October, 2020)

As per Hon'ble NGT Vide its Order dated 09/10/2017, in OA No. 22 of 2013 THC & dated September, 27, 2018 in OA No. 640/2018 (Earlier OA No. 22/2013)



CENTRAL POLLUTION CONTROL BOARD

(Ministry of Environment, Forest & Climate Change, Govt. of India)

'Parivesh Bhawan' C.B.D. Cum-Office Complex,
East Arjun Nagar, Shahdara, Delhi-110032

E-mail:divsinha@yahoo.com, Website- www.cpcb.nic.in

March, 2021

1. Background

- 1.1. Hon'ble NGT in its order dated 09/10/2017 in OA No. 22 of 2013 T_{HC}, directed Central Pollution Control Board to collect and analyse the samples of ambient air quality once in four months, and they shall also conduct at least two surprise inspections and analysis be made in a year from M/s. Timarpur Okhla Waste Management Company Ltd.
- 1.2. Further Hon'ble NGT vide its order dated September, 27, 2018 in OA No. 640/2018 (Earlier OA No. 22/2013), issued the following directions:
 - In pursuance of earlier order of this Tribunal dated 18.04.2018, joint inspection of Waste to Energy (WtE) Plants at Delhi has been conducted by the CPCB and the DPCC. Findings of reports are that WtE plants at Okhla, Ghazipur and Bawana are non-compliant with respect to the standards of Particulate matter.
 - ii. "Directed CPCB to send a copy of its report to the project proponents of Okhla, Ghazipur and Bawana Waste to Energy Plant for compliance and conduct another inspection within one month in view of the fact that the earlier inspection was in February, 2018 and requirement of carrying out inspection is in every 4 months We do not find any ground to accept the prayer for reliving CPCB of its requirement in four monthly monitoring. If there is a manpower constraint, it is for the CPCB to make any other appropriate arrangement for discharging its functions. This cannot be the ground to avoid responsibility under the binding directions of this Tribunal"
 - iii. "It is made clear that if the project proponents fail to maintain the standards, even after carrying out the deficiencies noticed in the joint inspection Report, CPCB may recommend the amount of environmental damage required to be paid by them".

In view of above directions, monitoring was planned during September & October, 2020 of Okhla, Bawana & Gazipur WtE plants. However, due to non-working of the Waste to Energy Plant Ghazipur on 16.09.2020 monitoring could not be carried out. The remaining two plants viz. Okhla & Bawana were subsequently monitored by CPCB & DPCC joint inspection team during September, 21-22, 2020 and September 24-25, 2020 respectively. The members of joint committee i.e. representatives from MoEF & CC, expert from IIT Delhi and representative of Sukhdev Vihar RWA (For Okhla Waste to Energy Plant) were informed vide email dated September 11, 2020 regarding the inspection schedule. Representative from MoEF &CC, expert from IIT Delhi were not present during the inspection of Waste to Energy Plants Okhla & Bawana and representative of RWA Sukhdev Vihar was not present during inspection of Okhla. Further, subsequent to Ghazipur Plant becoming

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operational, joint inspection team from CPCB, DPCC and expert from IIT, Delhi monitored the plant on October 13-14, 2020. The inspection reports of the three WtE plants is given in the following sections.

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Waste to Energy Plant Okhla

CENTRAL POLLUTION CONTROL BOARD, DELHI



1	Name and addr	ess of the industry	1000		our Okhla Waste ent Company Limited,	
					Compost Plant, Behind nura Road, New Delhi-	
	Coordinates (Lo	ongitude & Latitude)	L	at. 28.553	672 & Long. 77.280838	
2.	Name of the occ	cupier/contact person v	with N	Ir. Sande	ep Dutt	
	1 1 -					
	Telephone		N	lob. 09958	3360016	
	Fax					
	E-mail		9	Sandip.dutt@jindalcopolis.com		
3.	Date of inspecti	on / monitoring	S	September 21-22, 2020		
4.	Installed processing Capacity (as per consent)		d c N	ated 21.0 apacity to	CC Authorization letter 05.2020 the unit has 0 process 1950 TPD ubsequent generation of ver.	
5.	Production statu	us (on date of inspection	n) C	Operational		
6	Actual Power G	eneration	100	etails anges duri	of power generation ng the said inspection	
	Date		Power G	eneration	1	
		Time	Minim	ium	Maximum	
	21.09.2020	6 AM to 6 PM	18.94		21.61	
	22.09.2020	6 AM to 6 PM	18.68		21.11	

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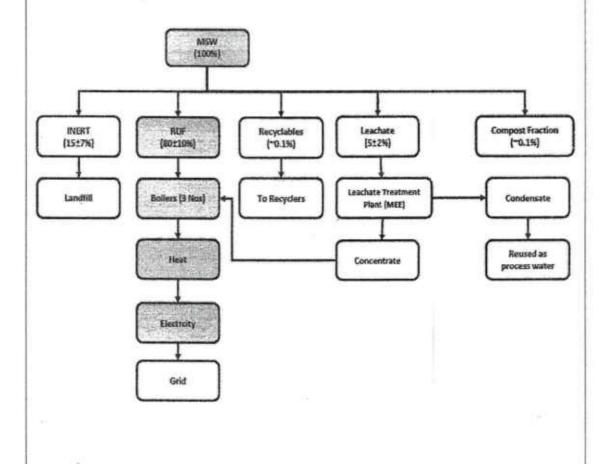
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7. Process Flow Diagram

The unit has own segregation setup of MSW having two trommels with ballastic separators for segregation of MSW and production of RDF. The detailed materials flow sheet is as given below:



8. Air Pollution - Emission Sources & Control

Sourc	ces of air pollution	Chimney Details	APC Equipment	Emission Quality	
Stack of the Waste to Energy plant (Three boilers connected to one stack)		60 mtrs	Scrubber followed by bag filters	Stack Monitoring Conducted by CPCB team & results are tabulated at Table -1	
9.	OCEMS Status	L		stack & was found uring the inspection.	
10	Ambient Air Quality (Conducted at two locations namely Sukhdev Vihar & STP Okhla)		Ambient Air tabulated at T	Statistical and the control of the c	

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11. Continuous Ambient Air Quality Station

CAAQMS not yet installed

Analysis results of LOI and heavy metals in Bottom ash and Fly ash are tabulated at Table-3

Table 1: Analysis results of the stack emission monitoring of the WtE plant Okhla

S. No.	Parameters	Monitor by	Standards as per	Standards as per Solid	Date of Sampling	Meas		
110.		,	Consent to Operate issued by DPCC	Waste Management Rules, 2016,	21-22 September, 2020	Sta	ick	
1.	PM		30 mg/Nm ³	50 mg/Nm ³		10.7	4.4	
2.	Hydrogen Chloride	CPCB	50 mg/Nm ³	50 mg/Nm ³		19	8	
3.	SO ₂		100 mg/Nm³	200 mg/Nm ³		BDL	BD L	
4.	NO _x (NO and NO ₂ expressed as NO ₂)		350 mg/Nm ³	400 mg/Nm ³		90.3	85. 6	
5.	СО		100 mg/Nm ³	100 mg/Nm ³	4	1.8		
6.	HF		0.5 mg/Nm ³	4 mg/Nm ³		BE		
7.	Sb + As + Pb +Cr+ Co+ Cu+ Mn + Ni+ V+ their compounds		0.5 mg/Nm ³	0.5 mg/Nm ³	5	0.0	12	
8.	Cd + Th +their compounds		0.05 mg/Nm ³	0.05 mg/Nm ³				
9.	Pb		0.1 mg/Nm ³	Not prescribed		0.0		
10.	Hg		0.02 mg/Nm ³	0.05 mg/Nm ³	2020-10-0	ВС		
11.	Dioxin & Furans	M/s SRI, Delhi	0.1 ngTEq/Nm³	0.1 ngTEq/Nm ³	22-10.2020	0.9		
12.	Total Organic Compounds(as C) at 11%O ₂		20mg/Nm ³	20mg/Nm ³	1	7.	7.2	

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Table-2, 24 hourly	average values of	ambient air qual	ity monitoring
		managed and a series of managed	

Date of	Monitored	Parameters	Prescribed	Measured values	
sampling	by		Standard* (in µg/m³)	Sukhdev Vihar Location-I	STP Okhla Location-II
21-23	CPCB	PM _{to}	100	85.66	72.33
September		PM _{2.5}	60	78	39
2020		NO ₂	80	41.66	28.33
		SO ₂	80	8.166	39

^{*}National ambient air quality standards as notified on dated 16.11.2009 under the Environment Protection Act, 1986.

Table 3: Analysis results of Bottom ash and Fly ash

Date of sampling	Parameters	Standard/Limit	Measured values	
21.09.202 0	Loss on Ignition (for Bottom ash only)	<5%*	2.29%	
			Bottom Ash	Fly Ash
	Arsenic	5 mg/l#	BDL	BDL
	Cadmium	1 mg/l#	BDL	BDL
	Chromium	5 mg/l#	0.05	0.26
	Manganese	10 mg/l#	BDL	BDL
	Lead	5 mg/l#	0.03	0.05
	Selenium	1 mg/l#	BDL	BDL
	Copper	25 mg/l#	0.29	BDL
	Nickel	20 mg/l#	BDL	BDL
	Zinc	250 mg/l#	0.03	0.15
	Cobalt	80 mg/l#	BDL	BDL
	Vanadium	24 mg/l#	BDL	BDL
	Antimony	15 mg/l#	BDL	BDL

^{*}Standards prescribed by DPCC in the Consent to Operate.

13. Status of validity & compliance of consent and authorization

	Consent/Authorization	Validity
1	Under Water Act	Valid till 24.09.2024
H	Under Air Act	Valid till 24.09.2024





[&]quot;Concentration Limit to categorise as hazardous waste as per the Hazardous and Other Wastes (Management and Tran boundary Movement) Rules, 2016, notified under the Environment (Protection) Act, 1986.

14. Observations:

- a. The processing capacity of the plant is 1950 TPD. However as informed, the plant received only 1652.51 TPD of mixed Municipal Solid Waste (MSW) on 21.09.2020.
- b. As informed, total RDF generation in the plant is approximately 1350 TPD. As per the logbook RDF used as fuel in boilers on 21.09.2020 & 22.09.2020 is tabulated at Table 4:

Table 4: RDF Feed Record

		100 000 000 000 000 000 000 000 000 000		100 C C C C C C C C C C C C C C C C C C				
	RDF Feed (21-09-2020)							
S. No	Feeding	Duration	Boiler 1	Boiler 2	Boiler 3			
1	06:00	07:00	17.8	17.3	17.6			
2	07:00	08:00	17.1	17.8	17.2			
3	08:00	09:00	16.9	16.8	16.7			
4	09:00	10:00	17.4	16.7	17.7			
5	10:00	11:00	17.0	18.2	19.1			
6	11:00	12:00	18.0	17.0	16.9			
7	12:00	13:00	17.4	18.0	17.5			
8	13:00	14:00	18.0	17.2	17.8			
9	14:00	15:00	18.0	16.8	16.1			
10	15:00	16:00	17.6	17.2	17.9			
11	16:00	17:00	23.4	16.4	17.7			
12	17:00	18:00	17.2	16.6	17.7			
	Total	Feed	215.8	206.0	209.9			

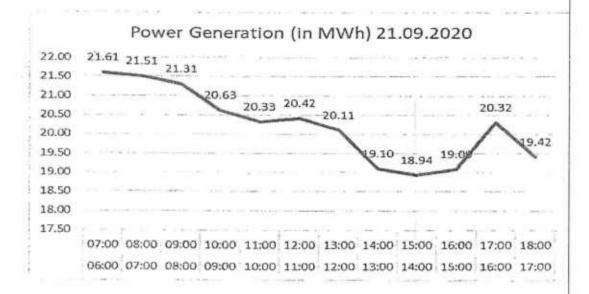
		RDF Fee	ed (22-09-2020)	
S. No	Feeding	Duration	Boiler 1	Boiler 2	Boiler 3
1	06:00	07:00	24.8	18.2	18.5
2	07:00	08:00	17.2	18.6	18.8
3	08:00	09:00	21.6	18.0	17.7
4	09:00	10:00	17.3	18.2	22.7
5	10:00	11:00	16.6	18.6	15.5
6	11:00	12:00	18.4	20.8	18.1
7	12:00	13:00	18.7	18.6	17.8
8	13:00	14:00	19.0	18.6	22.4
9	14:00	15:00	25.2	18.2	18.2
10	15:00	16:00	18.6	23.8	18.5
11	16:00	17:00	18.1	18.3	18.6
12	17:00	18:00	18.3	18.6	18.3
		Feed	233.8	228.5	225.1

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- c. All the three boilers along with pollution control devices were found operational.
- d. The temperature of furnace was maintained between 950-1050"C.
- e. Details of power generation during the said inspection is plotted at Figure 1.



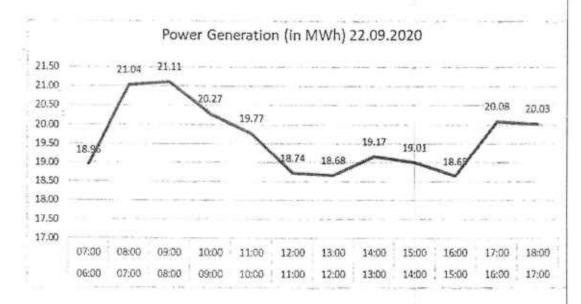


Figure 1: Time vs. power generation plot dated 21 & 22nd September, 2020

 It is observed that power generation during the monitoring (18.5-21.5 MW) less than the rated power generation capacity (23 MW) of the plant.

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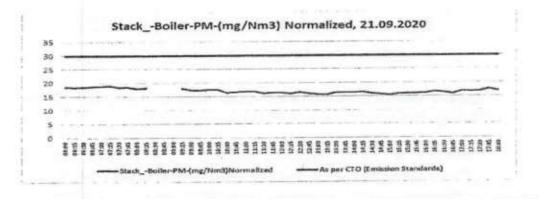
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- g. Stack emission monitoring results are given in Table 1. Following are the observations:
 - The Dioxin and Furans values (0.99 ngTEq/Nm³) of stack monitoring exceeded the permissible limit (0.1 ngTEq/Nm³) monitored by Shriram Institute of Industrial Research (SRI), Delhi.
 - ii. HCL parameter (198 mg/Nm³) of stack emission monitored by CPCB exceeded the prescribed limit (50 mg/Nm³)
 - iii. Remaining parameters were within the stipulated norms.
- h. Online Continuous Emission Monitoring System (OCEMS) for PM, SO₂, NOx and HCl in the stack emission had been installed and it was found working at the time of inspection. Result obtained from OCEMS on 21.09.2020 is plotted at Figure-2. Comparison of OCEMS data with joint monitoring results is also tabulated in Table 5. Comparison of OCEMS data with joint monitoring results reveals that the OCEMS data is not matching with the actual monitoring results. HCl level as per actual monitoring is higher than that reported by OCEMS. Also levels of PM, SO₂ and NOx as per actual monitoring is higher than that reported by OCEMS.

Table-5: Comparison of OCEMS and joint monitoring data of Stack emission

SI. No.	Parameters	OCEMS	Joint inspection results
1.	PM mg/Nm ³	15-20	4.4-10.7
2.	HCL mg/Nm ³	10-30	198
3.	NO _x mg/Nm ³	150-200	85-90
4.	SO ₂ mg/Nm ³	40	BDL



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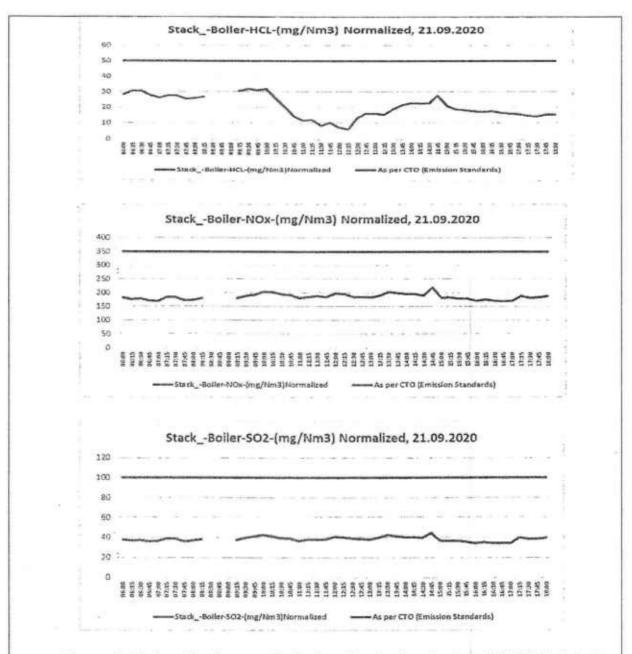


Figure-2: Online Continuous Emission Monitoring System (OCEMS) data for PM, SO₂, NO_x and HCL on 21.09.2020.

- Ambient Air Quality monitoring results are given in Table 2. It is observed that PM2.5 (78 μg/m³) exceeded the prescribed limit (60 μg/m³) at Sukhdev Vihar monitoring station. Remaining parameters were found within the limit of both monitoring stations (STP Okhla & Shukdev Vihar).
- M/s. Timarpur Okhla Waste to Energy plant has placed order to M/s JITF ECOPOLIS for purchase of Continuous Ambient Air Quality Monitoring Station (Copy enclosed).

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- k. Analysis reports of loss of ignition (LOI) and heavy metals in fly ash and bottom ash are in Table-3. It is observed that monitored levels of all the parameters are within the specified limit.
- Fly ash bricks manufacturing unit is installed but was not operational during the inspection.
- m. Plant has installed water sprinkling system for dust settlement.
- n. To control the emission of flue gas, the unit is using Ca(OH)₂ and Hydrophobic Organic Carbon (HOC) as dosing and approximately 172 Kg/h and 54.2 Kg/h of Ca(OH)₂ and HoC used for dosing during inspection on 21.09.20.
- During inspection, Multi effect evaporator (MEE) was found operational for treatment of leachate and the treated water was reused as process water.
- As informed average 250 MT of inerts are produced every day and disposed of at Jaitpur site.
- q. Radioactive sensors are installed at gate no. 2 of plant.
- Plant has maintained considerable greenery inside the premises and along boundary wall.

15. Recommendations

- Plant to properly control production process and pollution control equipment to ensure that all parameters including Dioxin & Furans and HCl are within the stipulated norms.
- ii. Plant should implement necessary measures to improve ambient air quality (including PM_{2.5} concentration) in and around the plant.
- OCEMS to be calibrated properly to ensure that OCEMS data matches with actual monitoring results.
- iv. Okhla plants should utilize 100 % Fly ash for beneficial purposes like bricks manufacturing etc. and time bound Action Plan to be submitted for the same.
- The plant to specify the timeframe within which the online continuous ambient air quality monitoring station shall be installed.

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Waste to Energy Plant Bawana

CENTRAL POLLUTION CONTROL BOARD, DELHI Name and address of the industry M/s Delhi MSW Solutions Ltd. Pocket N-1, Sector-5, Bawana Industrial area, Behind Pragati Power Plant Delhi-110039 Latitude Extension: 28°47'58.36"N Longitudinal Extension: 77° 04'11.79"E Coordinates (Longitude Latitude) Name of the occupier/contact 2. K Vijay Kumar Reddy person with Mob. 9821124350 Telephone laboratorynarela@ramky.com Fax E-mail Date of inspection and monitoring 3. September, 24-25, 2020 Installed processing Capacity 4. 2000 TPD Processing and Disposal facility (as per consent) with 24 MW Waste to Energy Plant Production status (on date of 5. Operational inspection) Actual Power Generation 6 Details of power generation ranges during the said inspection Date Power Generation (MW) Time Minimum Maximum 24.09.2020 6 AM 21.1 to 1 22.3 PM 25.09.2020 6 AM to 6 21.4 20.1 PM

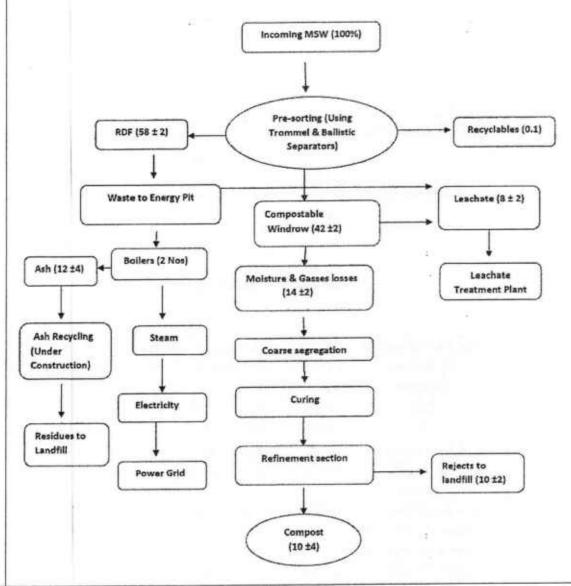
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Process Flow Diagram:

The unit has own segregation setup of MSW having 13 trommels with 4 ballastic separators for segregation of MSW and production of RDF. The detailed materials flow sheet is as given below:



8. Air Pollution - Emission Sources & Control

Sources of air pollution	Chimney Details	APC Equipment	Emission Quality
Stack of the Waste to Energy plant (Two boilers connected to one stack)	60 mtrs	reactor), Activated	Conducted by CPCB team & Dioxin & Furans by M/s SIIR, Delhi.

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9.	OCEMS Status	Installed with stack & was found operational during the inspection.
10	Ambient Air Quality monitoring Conducted at two locations at near main gate of the plant and fire station Bawana	Ambient Air Quality Status given in Table - 7
11.	Continuous Ambient Air Quality Station	CAAQMS installed & was working
12.	Bottom Ash & Fly Ash	Analysis results of LOI and heavy metals in Bottom ash and Fly ash result in Table-8

Table 6. Analysis results of the stack emission monitoring of the WTE plant Bawana

S. No.	Parameters	Monito red & Analys ed by	Standards as per Consent to Operate issued by DPCC	Standards as per Solid Waste Managemen t Rules, 2016,	Date of Sampli ng	Measured values in mg/Nm ³
1.	Particulate Matter	CPCB	30 mg/Nm ³	50 mg/Nm ³	24-25	16.7, 12.8
2.	Hydrogen Chloride	CPCB	50 mg/Nm ³	50 mg/Nm ³	Septem ber,	3.35
3.	SO ₂	CPCB	100 mg/Nm ³	200 mg/Nm ³	2020	BDL, BDL
4.	NOx	CPCB	350 mg/Nm ³	400 mg/Nm ³		17.7, 82.0
5.	Carbon Monoxide	CPCB	100 mg/Nm ³	100 mg/Nm ³		0
6.	Hydrogen Fluoride	CPCB	0.5 mg/Nm3	4 mg/Nm ³		BDL
7.	Sb+As+Pb+Cr+C o+Cu+Mn+Ni+V+t heir compounds	CPCB	0.5mg/Nm ³	0.5mg/Nm ³		0.058
8.	Cd + Tl + their compounds	CPCB	0.05mg/Nm ³	0.05mg/Nm ³		
9.	Pb :	CPCB	0.1mg/Nm ³	Not prescribed		0.006
10.	Hg	CPCB	0.02mg/Nm ³	0.05mg/Nm ³		BDL
11.	Dioxin & Furans	TO THE STATE OF TH	0.1 ngTEq/Nm ³	0.1 ngTEq/Nm ³		0.49
12.	Total Organic Compounds(as C) at 11%O ₂	M/s SRI, Delhi	20mg/Nm ³	20mg/Nm ³	28.10.2 020	5.1

^{*} BDL for SO2 is <1.0 mg/Nm³, BDL for HF is <1.0 mg/Nm³, BDL for Hg < 1.0 $\mu g/Nm^3$

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Table 7: 24 hourly average ambient air quality monitoring conducted by CPCB at WtE Plant Bawana

Paramet	Date of	Monitored	Prescribed	Measure	d values
ers	sampling	by	Standard* (in µg/m³)	Fire Station Bawana Location-I	Near main gate Location-II
PM ₁₀	23-25	CPCB	100	131.33	89.33
PM _{2.5}	September , 2020	77,275. 0344.07	60	84.00	40
NO ₂			80	36.33	17.00
SO ₂	3 - 11h		80	11.66	10.66

^{*}National ambient air quality standards as notified on dated 16.11.2009 under the Environment Protection Act, 1986.

Table 8: Analysis results of LOI and heavy metals in Bottom Ash and Fly Ash

Date of sampling	Parameters	Limit	Measured Values	
oupg	Loss on Ignition (for bottom ash only)	<5%*	1.0	67%
			Bottom Ash	Fly Ash
	Arsenic	5 mg/l#	BDL	BDL
	Cadmium	1 mg/l#	BDL	BDL
	Chromium	5 mg/l#	0.08	0.69
	Manganese	10 mg/l#	BDL	BDL
24	Lead	5 mg/l#	BDL	BDL
September, 2020	Selenium	1 mg/l#	BDL	BDL
	Copper	25 mg/l#	0.01	BDL
	Nickel	20 mg/l#	BDL	BDL
	Zinc	250 mg/l"	0.02	0.04
	Cobalt	80 mg/l#	BDL :	BDL
	Vanadium	24 mg/l#	BDL	BDL
	Antimony	15 mg/l#	BDL	BDL

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BDL: for Lead <0.013 ug/l, Selenium < 0.019ug/l, for Copper < 0.003 ug/l, for Nickel < 0.003 ug/l, for Cobalt < 0.002 ug/l and Vanadium < 0.16 ug/l.

#Concentration Limit to categorize as hazardous waste as per the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016, notified under the Environment (Protection) Act, 1986.

13. Status of validity & compliance of consent and authorization

	Consent/Authorization	Validity	
1	Under Water Act (Copy enclosed)	Valid till 05-05-2021	
П	Under Air Act (Copy enclosed)	Valid till 05-05-2021	

14. Observations

During the inspection on 24-25, September, 2020 following observations were made.

- a) The processing capacity of the plant is 2000 TPD. However, the plant receipts 2794 MT and 2600 MT of Municipal Solid Waste on 24.09.2020 & 25.09.2020 respectively, which is more than the consented capacity of the plant.
- b) The unit has own segregation setup of MSW having 6 trommels with blastic separators for segregation of MSW and production of RDF. Ferrous waste is segregated manually as well as through magnetic separator installed at conveyor belt of ballistic separators. Plant Machinery Details DMSWSL Bawana is tabulated in table 9:

Table 9: Detailed machinery used during segregation of MSW

Section Wise	Equipment Name	Number of Machinery
Pre Sorting	Trommels- 50 mm	6 No's
	Ballastic Separator	4 No's
Preparatory Section	Trommels- 20 mm	4 No's
Refinement Section	Trommels- 4 mm	3 No's
Bio Mining	Puzolana	1 No's

c) As informed, total RDF generation in the plant is approximately 1500 TPD. As per the logbook RDF used as fuel in boilers on 24.09.2020 is tabulated at **Table 10**:

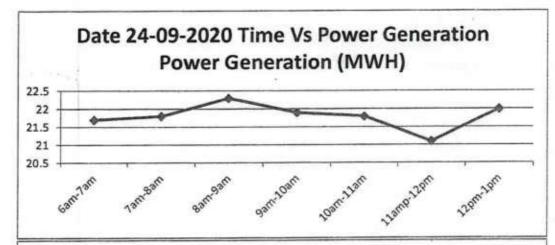
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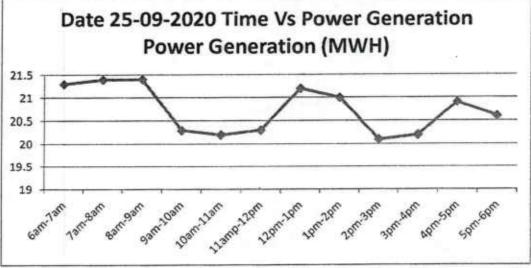


Table 10: RDF Feed Record on 24.09.2020

SI. No.	Time	RDF Feeding (TPH)
1.	9-10 AM	54
2.	10-11 AM	52
3.	11-12 PM	56
4.	12-1.0 PM	58
5.	1.0-2.0 PM	56
6.	2.0-3.0 PM	52

d) Details of power generation ranges during the said inspection period is placed at Figure 3. It is observed that power during the monitoring was less than the (20-22.5 MW) below the rated power generation capacity (24 MW) of the plant-although the plant was processing waste at full capacity.





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Figure 3: Time vs. power generation plot dated 24 & 25th September, 2020.

- e) At the time of inspection on 24.09.2020, plant tripped due to grid fluctuation (High voltage) from 1 PM to 5.30 PM.
- f) The two boilers and attached pollution control devices were found operational during monitoring. The temperature of furnace was maintained between 1142-1162°C.
- g) Stack emission are tabulated in Table 6. It was observed that:
 - Dioxin and Furans values (0.49 ngTEq/Nm³) are exceeding the permissible limit (0.1 ngTEq/Nm³) monitored by M/s. SRI, Delhi,
 - II. Remaining parameters were within the stipulated norms.
- h) Online Continuous Emission Monitoring System (OCEMS) for PM, SO₂, NOx and HCL in the stack emission had been installed and it was found working at the time of inspection. Result obtained from OCEMS on 25.09.2020 are plotted in Figure-4. Comparison of OCEMS data with joint monitoring results is tabulated in Table 11. Comparison of OCEMS data with joint monitoring results reveals that the OCEMS data is not matching with the actual monitoring results. HCL level as per actual monitoring is less than that reported by OCEMS. Also levels of PM, SO2 and NOx as per actual monitoring is less than that reported by OCEMS.

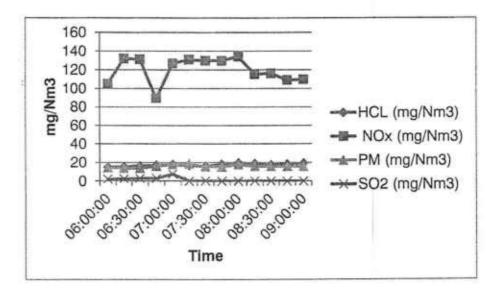


Figure 4: Online Continuous Emission Monitoring System (CEMS) data for PM, SO₂, NOx, and HCL on 24.09.2020.

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Table 11: Comparision of OCEMS data and Joint monitoring data of Stack emission

SI. No.	Parameters	OCEMS	Joint inspection results
1.	PM mg/Nm3	13.8-18.41	12.8-16.7
2.	HCL mg/Nm3	15.02-19.48	3.35
3.	NO _x mg/Nm3	89.4-131.94	17.7-82
4.	SO ₂ mg/Nm3	0.01-7.6	BDL

- i) Ambient Air quality monitoring results are given in Table 7. It is observed that PM2.5 (84 μg/m³) & PM₁₀ (131. 33 μg/m³) exceeded the prescribed limit (60 μg/m³ &100 μg/m³) at Fire Station Bawana. Concentration levels of the remaining parameters are within the stipulated norms.
- j) Online Continuous Ambient air quality monitoring station (CAAQMS) has been installed at facility & data is tabulated in Table 12 for 25.09.2020. It observed that values of PM₁₀ exceeded the standard limit at 12.00 noon (176 μg/m³), 2.30 PM (166.5μg/m³), 3.15 PM (190.1μg/m³) and 4.00 PM (202.1μg/m³) whereas the limit of PM_{2.5} exceeded at 4.00 PM. Other parameters such as SO₂ (6-6.9 μg/m³), NOx (12.9-19.5μg/m³) were found well within the standard limit.

Table 12: Online Continuous Ambient air quality monitoring (CAAQMS)
data on 25-09-2020

Time	Parameters						
	SO ₂ μg/m ³	NO μg/m³	NO ₂ μg/m ³	NO _x μg/m³	PM ₁₀ μg/m ³	PM _{2.5} μg/m ³	CO mg/m ³
12.00 noon	6.9	-1.2	15.9	14.7	176	56.4	-0.46
1.00 PM	6.6	-1.2	17.0	15.7	35.3	:-1.0	-0.45
2.30PM	5.6	-1.1	13.9	12.9	166.5	-0.6	-0.42
3.15PM	6.0	-1.2	15.6	14.3	190.1	37.8	-0.38
4.00PM	6.9	4	19.9	19.5	202.1	68.9	-0.36

k) Analysis reports of loss of ignition (LOI) and heavy metals in fly ash and bottom ash

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- are in Table-8. It is observed that monitored levels of all the parameters are within the specified limit.
- I) Segregated rejects, bottom ash and fly ash are disposed into the sanitary landfill site existing within the facility premise at Bawana.
- m) Lime and activated carbon are used as a dosing agent in flue gas. Amount of dosing used at the said inspection is plotted as Figure 5. The quantity of lime and activated carbon doused is observed to be in the range of 572-667kg/h and 16-23 Kg/hr respectively.

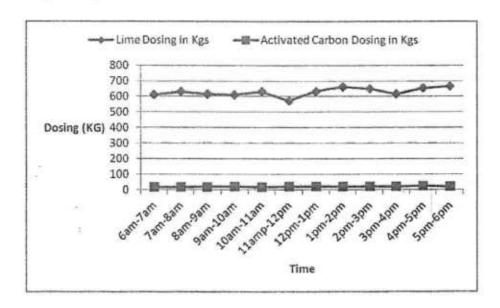


Figure-5: Amount of Lime and Activated Carbon used as dosing on 25-09-2020.

- n) Leachate from Waste tipping floor, Windrows floor, sanitary landfill (within its premise) and the open pre-processed storage Area, are treated in the leachate treatment plant and treated water is being used for gardening, road wash etc.
- o) Treated leachate analysis report is tabulated in Table 13. It has been observed that the values of TDS & Chloride of treated leachate exceeded the standard limit on Land disposal. It is observed that treated leachate is not complying the stipulated standards with respect to TDS & Chloride

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Table: 13: Analysis report of treated leachate of Bawana WtE plant

S. No	Parameter	Land disposal (Standards as per SWM Rules, 2016)	Treated Leachate analysis report
1.	Suspended solids, mg/l, max	200	26
2.	Dissolved solids (inorganic) mg/l, max.	2100	6744
3.	pH value	5.5 to 9.0	
4.	Ammonical nitrogen (as N), mg/l, max.	7.	1.7
5.	Total Kjeldahl nitrogen (as N), mg/l, max.	* :	
6.	Biochemical oxygen demand (3 days at 270 C) max.(mg/l)	100	25
7.	Chemical oxygen demand, mg/l, max.	•	261
8.	Arsenic (as As), mg/l, max	0.2	BDL
9.	Mercury (as Hg), mg/l, max	-	
10.	Lead (as Pb), mg/l, max	•	BDL
11.	Cadmium (as Cd), mg/l, max		BDL
12.	Total Chromium (as Cr), mg/l, max.		0.02
13.	Copper (as Cu), mg/l, max.		BDL
14.	Zinc (as Zn), mg/l, max.		0.06
15.	Nickel (as Ni), mg/l, max	-	BDL
16.	Cyanide (as CN), mg/l, max.	0.2	
17.	Chloride (as Cl), mg/l, max.	600	1564
18.	Fluoride (as F), mg/l, max		
19.	Phenolic compounds (as C6H5OH) mg/l, max.	•	BDL

- p) As informed, M/s. Waste to Energy plant Bawana has placed order to M/s. Spray Engineering Devices Limited for purchase of 200 KLD Low Temp Evaporator with Mechanical Vapor Recompression (MVR) System.
- q) As informed, after segregation 80 MT of compost is being generated per day and sold to the market.



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- r) Radioactive sensors are installed at entrance gate of the plant & was found working on the date of inspection.
- s) Storage and segregation process of MSW being done within a covered area.
- t) The facility is collecting solid waste since 2009 and legacy waste of about 0.8 Million MT is being stored in an open area of about 9 acres. This waste is also being processed in the plant.
- u) Plant has maintained considerable greenery inside the premises.

15. Recommendations

- a) Plant should process the waste as per the consented capacity. The production process should be optimized so that power generated from the plant is as per the consented capacity of the plant.
- b) Plant to properly control production process and pollution control measures to ensure that all parameters including Dioxin & Furans are within the stipulated norms.
- c) Plant should implement necessary measures to improve ambient air quality (including PM_{2.5} & PM₁₀ concentration) in and around the plant.
- d) OCEMS to be calibrated properly to ensure that OCEMS data matches with actual monitoring results.
- e) Time bound action plan to be submitted for implementation of Fly ash and inert material utilization measures.
- f) Time bound Action Plan to be submitted for installation of Mechanical Vapor Recompression (MVR) system for leachate treatment.

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Waste to Energy Plant Ghazipur

CENTRAL POLLUTION CONTROL BOARD, DELHI



1	Name and address of the industry	M/s East Delhi Waste Processin Company Ltd. Adjacent to Veterinary Hospital Behind Ghazipur DDA Flats Ghazipur, Delhi- 110096
	Coordinates (Longitude & Latitude)	Lat. 28.622653, Long. 77.323398
2.	Name of the occupier/contact person with Telephone Fax E-mail	Mr. lype George 8448692608 lype.George@ilfsindia.com
3.	Date of inspection and monitoring	October, 13-14, 2020
4.	Installed processing Capacity	1300MT of Municipal Solid Wast (MSW) per day for the generation of 12MW electricity.
5.	Production status (on date of inspection)	Operational
6a.	Power Generation Authorized	12MW
6b	Actual Power Generation	Details of power generation ranges during the said inspection
		Date Power Generation range (MW) 6 AM- 6 PM
		13.10.2020 3.45 – 8.75

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Process Flow Diagram 7. The unit has segregation setup of MSW which consist of trommels with blastic separators for segregation of MSW and production of RDF. MSW (1000 TPD) Inert + others Leachates 539 TPD RDF (461 TPD) Leachate Treatment Plant Boiler Treated Water Used for the horticulture and Road Washing Heat Bottom Ash Fly Ash (18 TPD) (170 TPD) Electricity 12 MW

8. Air	Pollution - Emission	Sources & Control		
Sources of air pollution		rces of air pollution Chimney Details		Emission Quality
	boiler connected one stack of the to energy plant	60 meters	Scrubbing system	Given in Table -14
9.	OCEMS Status			n stack & was found luring the inspection.
10	Ambient Air Quality Conducted at two locations (Ghazipur Police station location-1 & Delhi Transco Limited Ghazipur Location-2)		Ambient Air given in Tab	Quality results are le – 15

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11.	Continuous Ambient Air Quality Station	CAAQMS installed but was not working
12.	Bottom Ash & Fly Ash	Analysis results of LOI and heavy metals in Bottom ash and Fly ash are given in Table - 16

Table 14. Analysis results of the stack emission monitoring of the WTE plant, Ghazipur monitored and analyzed by CPCB.

S. No	Parameters	Monitored by	Standard s as per consent to operate issued by DPCC	Standard as per Solid waste Manageme nt Rules,2016	Date of Samplin g	Measured Values Stack-1 (Average)
1	Particulate Matter	СРСВ	30 mg/Nm³	50 mg/Nm ³	13-14 October,	62.7, 85.1
2	HCL	CPCB	50 mg/Nm ³	50 mg/Nm ³	2020	407
3	SO ₂	СРСВ	100 mg/Nm³	200 mg/Nm ³		BDL, 3.4
4	NOx (NO and NO2 expressed No2)	СРСВ	350 mg/Nm ³	400 mg/Nm³		869, 104.3
5	Carbon Monoxide	СРСВ	100 mg/Nm³	100 mg/Nm³		0
6	Hydrogen Fluoride	CPCB	0.5 mg/Nm³	4 mg/Nm ³		BDL
7	Sb+As+Pb+Cr+Co+ Cu+Mn+Ni+V+their compounds	СРСВ	0.5 mg/Nm ³	0.5 mg/Nm ³		0.164
8	Cd+Th+their compounds	CPCB	0.05 mg/Nm³	0.05 mg/Nm³		0.002
9	Pb	СРСВ	0.1 mg/Nm³	Not prescribed	(A)	0.019
10	Hg	СРСВ	0.02 mg/Nm³	0.05 mg/Nm³		0.21
11.	Dioxin & Furans	M/s SRI, Delhi	0.1 ngTEq/N m ³	0.1 ngTEq/Nm³	13.10.20 20	0.27
12	Total Organic Compounds(as C) at 11%O ₂		20mg/Nm ³	20mg/Nm ³		9.4

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* BDL for SO2 is <1.0 mg/Nm³, BDL for HF is <1.0 mg/Nm³, BDL for Hg < 1.0 $\mu g/Nm^3$

Table 15. 24 hourly ambient air quality monitoring conducted by CPCB

Parameters	Date of Samplin	Monitored by	Prescrib Measured valued		lues	
	g		Standar d*	Ghazipur Police station location-1	Delhi Transco Limited Ghazipur Location-2	
PM _{2.5}	October	CPCB	60	127	215	
PM10	13-15		100	273.66	404	
NO2			80	42.833	31	
SO2			80	BDL	15.66	

BDL for SO2 is < 4ug/m3

Table 16: Analysis results of LOI and heavy metals in Bottom ash and Fly ash

Date of sampling	Parameters	Limit	Measu	ired values in %
13.10.2020	Loss on ignition (For bottom Ash only)	<5%*	1.89	
			Bottom ash	Fly Ash
	Arsenic	5 mg/l #	BDI	BDL
	Cadmium	1 mg/l #	0.52	0.14
	Chromium	5 mg/l #	BDL	BDL
	Manganese	10 mg/l #	3.01	3.15
	Lead	5 mg/l #	0.08	0.04
	Selenium	1 mg/l #	BDL	BDL
	Copper	25 mg/l #	1.52	0.83
	Nickel	20 mg/l #	0.42	0.20
	Zinc	250 mg/l #	10.79	11.43
	Cobalt	80mg/l #	0.12	0.11
	Vanadium	24mg/l #	BDL	BDL
	Antimony	15mg/l #	0.36	0.05

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^{*}National ambient air quality standards as notified under the air (prevention and control of pollution) Act 1981.

Note: BDL for arsenic <0.022 mg/l BDL for Chromium<0.002 mg/l BDL for Manganese for Lead<0.013 BDL for Nickel BDL, 0.003 mg/l for Cobalt BDL< mg/l for Vanadium BDL<0.16 mg/l

#Concentration Limit of categorise as hazardous waste as per Hazardous and Other Wastes (Management and Trans boundary Movement) Rules, 2016, notified under Environment (Protection) Act, 1986. Facility for fly ash and inert material utilization are yet to installed.

	Consent/Authorization	Validity
1	Under Water Act (Copy enclosed)	Expired on 08-12-2018, applied for renewal of the same
11	Under Air Act (Copy enclosed)	Expired on 08.12.2018, applied for renewal of the same

14.0 Observations

- a. The plant is operating without valid consent. The plant was given Consent-to Operate which was valid upto 08.12.2018. The unit has applied for renewal of Consent.
- b. The unit has segregation setup of MSW which consist of trommels with blastic separators for segregation of MSW and production of RDF. However, the same was not operational at the time of inspection. Operator informed that the same is under maintenance.
- c. Segregation of waste was being done in partially covered area.
- d. The plant was receiving RDF from bio-remediation of waste from Ghazipur dumpsite. No MSW was received from EDMC on that day. Hence, the plant was operating at level much below as per its last consent.
- e. The plant does not have composting facility for wet waste and disposing wet waste when generated in the dumpsite.
- f. Average feed rate of the RDF to one boiler was observed at 33 MT/hr. As per the logbook total RDF used as fuel in boilers from 6 AM to 6 PM on 13.10.2020 is given in Table 17.

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Table 17:	RDF Feed Record
Time	Fuel Feed to Boiler MT
6:00 AM	35.28
7:00 AM	35.1
8:00 AM	33.25
9:00 AM	35.89
10:00 AM	36.25
11:00 AM	28.95
12:00 PM	31.25
1:00 PM	32.25
2:00 PM	32.65
3:00 PM	33.25
4:00 PM	31.58
5:00 PM	32.58
6:00 PM	31.58
Total Feed	429.86

g. Details of power generation ranges during the said inspection period is given in Figure 6. The power generation on 13.10.2020 was in the range of 3.45-8.75 MW which is much less than the rated power generation capacity of 12 MW. Captive power utilization of the plant is about 2 to 2.5 MW.

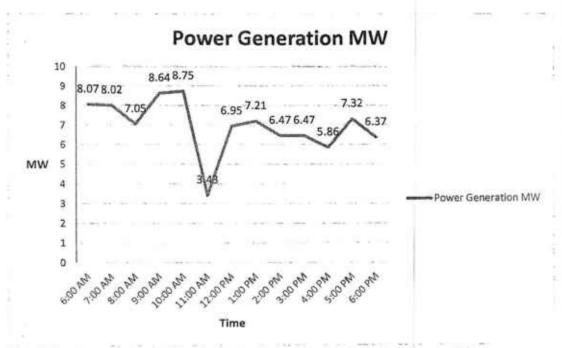


Figure 6: Time vs. power generation plot dated 13th October, 2020.

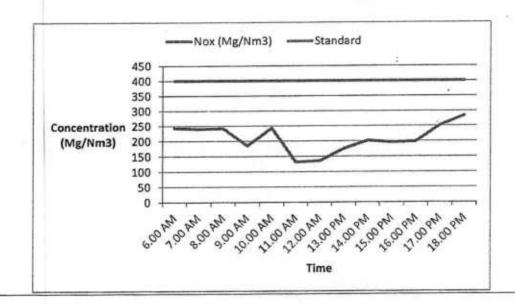
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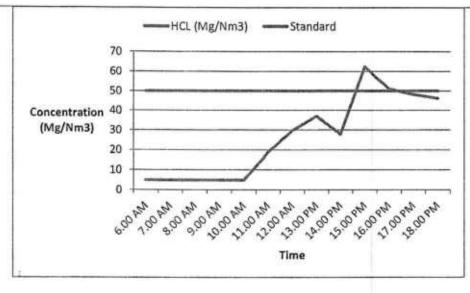
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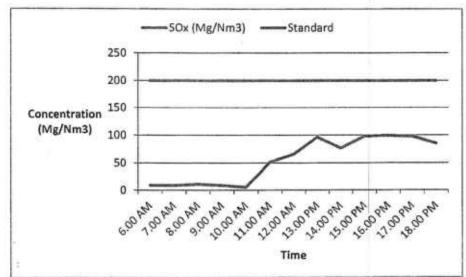
- One boiler along with pollution control devices was found operational. The average temperature of furnace was maintained most of the time was 950° C.
- i. Stack emission results are given in Table 14. The following are the observations.
 - Dioxin and Furans values (0.27ngTEq/Nm³) of stack monitoring exceeded the permissible limit (0.1 ngTEq/Nm³) monitored by M/s. SRI, Delhi.
 - ii. PM (62.7 & 85.1 mg/Nm³), NOx (869 mg/Nm³) and HCl (407 mg/Nm³) concentrations were exceeding the permissible limits (30, 350 & 50 mg/Nm³ respectively)
 - iii. Remaining parameters were well within the limit.
- j. Online Continuous Emission Monitoring System (OCEMS) for PM, SO₂, NOx and HCl in the stack emission had been installed and it was found working at the time of inspection except for monitoring PM. Results obtained from OCEMS on 13.10.2020 are plotted in Figure-7. Comparison of OCEMS data with joint monitoring results is tabulated in Table-18. Comparison of OCEMS data with joint monitoring results reveals that the OCEMS data is not matching with the actual monitoring results. HCl & NOx level as per actual monitoring was more than that reported by OCEMS. Whereas, SOx as per joint monitoring is lower than the OCEMS result.

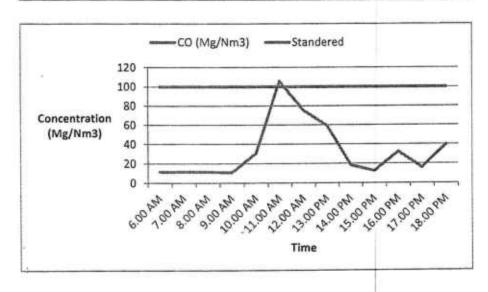


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Figure 7: Online Continuous Emission Monitoring System (OCEMS) data for NOx HCL, SOx, and CO on 13.10.2020.

Table 18: Comparison of OCEMS & Joint Monitoring data of the stack emission

SI. No.	Parameters	OCEMS	Joint inspection results
1.	PM mg/Nm3	Not working	62.7-85.1
2.	HCL mg/Nm3	4.86-51.13	407
3.	NOx mg/Nm3	132.4-251.71	869-104.3
4.	SO2 mg/Nm3	5.79-98.25	BDL
5.	СО	11.35-105.61	Not monitored

- j. Ambient Air quality monitoring results are given in Table-15. It is observed that PM2.5 & PM₁₀ at Ghazipur Police station & Delhi Transco Ltd. (127 μg/m³ & 215 ug/m³ and 273 ug/m³ & 404 ug/m³ respectively) exceeded the standard of prescribed limit (PM2.5 : 60 μg/m³ & PM10 100 μg/m³). Concentration levels of the remaining parameters are within the stipulated norms.
- Continuous Ambient Air Quality Monitoring Station (CAAQMS) was not operational during the inspection.
- Lime, Powered Activated Carbon (PAC) and Urea are used as dosing agents in Flue gas. A graph has been plotted for Lime, Powered Activated Carbon (PAC) and Urea used on 13.10.2020 during 6.00AM to 6PM as shown in Figure 8. The quantity of Lime, activated carbon and urea doused is observed to be in the range of 140-168kg/h, 4-6 kg/h and 20-28.32 Kg/hr respectively.

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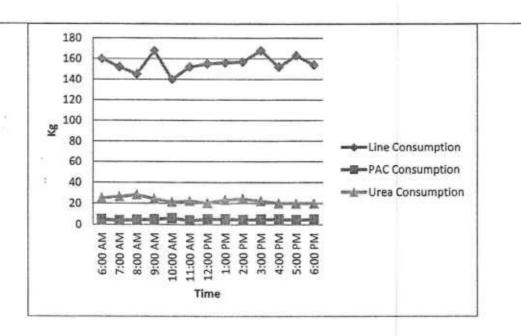


Figure-8: Amount of Lime, Activated Carbon and urea used as dosing on 13.10.2020.

- m. Analysis reports of loss of ignition (LOI) and heavy metals in fly ash and bottom ash are given in Table-16. It is observed that monitored levels of all the parameters are within the specified limit.
- n. The plant is dumping Bottom Ash, Fly Ash & inerts at Ghazipur Dumpsite. WtE plant Ghazipur is not utilizing Fly ash for beneficial purposes like bricks manufacturing etc.
- Leachate Treatment plant has been installed and treated leachate is being used for gardening, road waste etc.
- p. During inspection, Treated Leachate Treatment plant was found operational. Treated leachate analysis report is tabulated in Table-19. It has been observed that the value of TDS of treated leachate exceeded the standard limit on Land disposal.

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Table 19: Analysis report of treated leachate

S. No	Parameter	Land disposal (Standards)	Treated Leachate analysis report
	Suspended solids, mg/l, max	200	47
	Dissolved solids (inorganic) mg/l, max.	2100	2532
	pH value	5.5 to 9.0	-
	Ammonical nitrogen (as N), mg/l, max.	- 14	3.0
	Total Kjeldahl nitrogen (as N), mg/l, max.		
	Biochemical oxygen demand (3 days at 270 C) max.(mg/l)	100	18.2
	Chemical oxygen demand, mg/l, max.	-	92
	Arsenic (as As), mg/l, max	0.2	BDL
	Mercury (as Hg), mg/l, max	-	-
	Lead (as Pb), mg/l, max	-	BDL
	Cadmium (as Cd), mg/l, max		BDL
	Total Chromium (as Cr), mg/l, max.		BDL
	Copper (as Cu), mg/l, max.		0.03
	Zinc (as Zn), mg/l, max.	-	1.25
	Nickel (as Ni), mg/l, max	-	BDL
	Cyanide (as CN), mg/l, max.	0.2	-
	Chloride (as Cl), mg/l, max.	600	
	Fluoride (as F), mg/l, max		
	Phenolic compounds (as C6H5OH) mg/l, max.	•	BDL

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- q. Unit has not fixed radioactive sensors on the way of MSW loaded truck.
- During inspection all drains within the premises were found chocked & MSW found scattered on roads inside the plant.
- s. Plant has not maintained considerable greenery inside the premises.

15. Recommendations

- The plant has to upgrade its production process and emission control
 measures to ensure that the emission levels of all parameters including (PM,
 HCL, NOx, Dioxin & Furans) are within the stipulated limits.
- Plant should implement necessary measures to improve air quality (PM2.5 & PM10) in and around the plant.
- iii. OCEMS installed in the plant to be calibrated to ensure that OCEMS data matches with the actual monitoring results.
- iv. The plant has to ensure that CAAQMS installed in their premises is operational at all times and the display board for the same should be made functional.
- v. The plant should upgrade leachate treatment procedure so as to improve the treated leachate quality before spreading over land.
- vi. The plant has to provide facility for treatment of wet waste.
- vii. The segregation process of MSW of the plant has to be made operational to improve efficiency of the plant.
- viii. The plant has to be obtained valid consent to operate from DPCC.
- ix. The plant has to ensure that it is operational at full capacity when the joint inspection of the unit is carried out so that the monitoring results are conclusive.
- Time bound Action Plan to be submitted for utilization of fly ash and inert material.
- xi. Green Belt has to be developed around the plant as per Buffer zone Guidelines for waste processing processing facilities issued by CPCB.
- xii. Unit has to fix radioactive sensors at suitable places to effectively monitor the entering in the plant.
- xiii. House Keeping needs to be improved.

Name & designation of inspecting officer(s)	(Ratnesh Kumar), Sc.'B', CPCB Delhi	(Ramesh Chandra) EE, DPCC Delhi	Atanu Dey, RA-I, CPCB
Signature	Q. V	Bra	Stom god

BEFORE THE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH, NEW DELHI

M.A. No. 1168 of 2017 $In \label{eq:main}$ Original Application No. 22 of 2013 T_{HC}

Original Application No. 22 of 2013 THE

Sukhdev Vihar Residents Welfare Association & Ors.
Vs.
State of NCT of Delhi & Ors.

CORAM:

HON'BLE MR. JUSTICE SWATANTER KUMAR, CHAIRPERSON HON'BLE DR. JUSTICE JAWAD RAHIM, JUDICIAL MEMBER

HON'BLE MR. JUSTICE RAGHUVENDRA S. RATHORE, JUDICIAL MEMBER

HON'BLE MR. BIKRAM SINGH SAJWAN, EXPERT MEMBER

Present:

Applicant:

Ms. Alpana Podder, Adv. with Mr. Bhupender

Kumar, LA, Central Pollution Control Board ,

Applicant in M.A.

Respondent.:

Mr. Tarunvir Singh and Ms. Guneet Khehar,

Advs.

Ms. Sakshi Popli, Adv. for Delhi Jal Board Mr. Krishna Kumar Singh, Adv. for Ministry of Environment, Forest and Climate Change Ms. Priyanka Swami, Adv. for Nagar Nigam

Ghaziabad

Mr. Biraja Mahopatra, Adv. and Mr. Dinesh Jindal, LO for Delhi Pollution Control

Committee

Date and Remarks	Orders of the Tribunal
Item No. 12	M.A. No. 1168 of 2017
October 09, 2017	It is contended that keeping in view of the expense
88 & SN	involved, the fact is that the Central Pollution Control
	Board does not have in-house mechanism in the
	laboratories to analyse Dioxin and Ferrons.
	The prayer is that instead of monthly it may b
	made once in four months. We allow this prayer. Th
	Central Pollution Control Board is permitted to collect an
	analyse the samples of ambient air quality once in fou
	months, they shall also conduct at lease two surpris
	inspections and analysis be made in a year.
	With the above directions M.A. No. 1168 of 201
	stands disposed of. No order as to cost.
	C
	. (Swatanter Kumar)

Item No. 12	(Dr. Jawad Rahim)
09, 2017	4
SS & SN	(Raghuvendra S. Rathore)
	(Bikram Singh Sajwan)

BEFORE THE NATIONAL GREEN TRIBUNAL PRINCIPAL BENCH, NEW DELHI

Original Application No. 640/2018 (Earlier O.A. No. 22/2013)

Sukhdev Vihar Resident's Welfare Association Vs. State of Delhi & Ors.

CORAM: HON'BLE MR. JUSTICE ADARSH KUMAR GOEL, CHAIRPERSON HON'BLE MR. JUSTICE S.P. WANGDI, JUDICIAL MEMBER HON'BLE DR. NAGIN NANDA, EXPERT MEMBER

Present: Respondent:

Mr. Nilava Bandyopadhyay, Adv. for Project Proponent, Okhla Project

Date and Remarks	Orders of the Tribunal
Remarks Item No. 6 September 27, 2018 R	1. In pursuance of earlier order of this Tribunal dated 18.04.2018, joint inspection has been conducted by the Central Pollution Control Board and the Delhi Pollution Control Committee. Findings in the report are that the Waste-to-Energy Plants at Okhla, Ghazipur and Bawana are non-compliant with respect to the standards of the particulate matter. Following recommendations have been made: "Recommendations: 1. To ensure better efficiency of the Plant and Power generation the unit should feed segregated wastes. 2. Plant should adopt technologies to reduce Moisture Content in RDF. 3. Fly ash utilization should be done rather than dumping it on landfill site. 4. Unit shall install Fly ash bricks manufacturing unit. 5. Flow meters shall be installed at inlet and outlet of Leachete treatment plant. 6. Plant should adopt technologies to improve calorific value of RDF. 7. Plant shall be designed for 30-35 years."

September 27, 2018

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month in view of the fact that the earlier inspection was in February, 2018 and requirement of carrying out inspection is in every 4 months. We do not find any ground to accept the prayer for relieving Central Pollution Control Board of its requirement in four monthly monitoring. If there is a manpower constraint, it is for the Central Pollution Control Board to make any other appropriate arrangement for discharging its functions. This cannot be a ground to avoid responsibility under the binding directions of this Tribunal.

3. It is made clear that if the project proponents fail to maintain the standards, even after carrying out the deficiencies noticed in the joint inspection Report, Central Pollution Control Board may recommend the amount of environmental damage required to be paid by them.

The application is disposed of.

(Adarsh Kumar Goe	, CP l)
(S.P. Wangdi)	JM
(Dr. Nagin Nanda)	27.09.2018