



Delhi
2 January 2017

To

The Member Secretary
CPCB, Government of India
New Delhi

Subject : Comments on Central Pollution Control Board's recently issued draft protocol on proposed alert system for EQMS and CEMS for use of Continuous Real Time Effluent Quality and Air Emission Monitoring Data.

Dear Sir

EIA Resource and Response Centre (ERC) is a national level voluntary organization, keeping a watch on EC and FC processes. ERC regularly engages with MoEF&CC and its expert committees providing comments and suggestions on important proposals under consideration for clearances as well as on policy and law issues. Here, we are presenting brief suggestions on the monitoring protocol.

Proposed timeline to accept comment

At the very beginning, ERC believes that, any draft standards or guidelines or notifications must be put in place among public domain for a considerable time period of not less than one month. There should be a policy for time line for comments and availability of documents in public domain. The said document under consideration was not even displayed on the CPCB or MoEF&CC website.

Why to mix effluent & emission – the two very separate issues

The document deals with equipment failure and exceedance of effluent and emission limits together. We are doubtful whether clubbing the two issues, as is being done presently, is the best approach forward since they are two very different things.

Two separate protocols (and therefore documents) are needed, so that each problem can be dealt with separately and properly. The problem with having a combined protocol for failures and exceedances is illustrated below.

The time interval of failure/exceedance is being considered as the sole parameter to determine the different hierarchy of the alerts, thereby, for example, not considering the intensity of the

effluent/emissions. Although time duration may be a suitable parameter for cases of equipment failure, but it is unlikely to be enough in case of non-compliance. For example, it is stated that a yellow alert will be issued if the emission deviates from the norm by 60% for 8 consecutive days and similarly an orange alert would be issued if the time duration of the deviation is 32 days. What about the case if the exceedance is 600% for 8 consecutive days or even a shorter time span? To tackle issues like this, it may be better if a clear distinction be made between equipment failure and non-compliance with prescribed limits, possibly in two separate protocol documents.

Reiterating our point on the need to seek expert comments, it is important that parameters, thresholds and the limits being proposed are vetted by scientists and equipment manufacturers to ensure that they are within a reasonable and practical range.

Pollutants must get equal weightage besides the emission deviation

The average pollutant concentration is taken at 15 minute interval. We suggest that the interval needs to be changed to 30 minutes.

Currently, when emission deviates from the norm by >60% for Thirty two (32) consecutive readings (for all pollutants), alerts are issued. We suggest to rank the pollutants and issues the alerts based on the effects of each pollutants. This may be done by consulting the Epidemiologists.

Timely calibration of the instruments/system

This is an important pre-requisite, so as to ensure error free running and timely sending of alert in case of deviation. Therefore, frequency of calibration has to be given priority and need more detailing when talking about the protocol. It is not clear from the document whether the calibration of the equipment, after it is installed in the plants, is being considered.

Qualification of operators of the equipment

Since the protocol is very particularly talking about the current alert system to be more effective, therefore it is important to discuss the minimum qualification and capacity of the operator to run such system efficiently and effectively, as in most of the cases, the industries give less priority to the environmental issues and thereby end up running the plant by their fourth grade staff.

Action against non-compliance

The document is expressly for regulatory use of CEMS data, but in no place does it mention what corrective or penal action will be taken by the respective SPCBs/SPCCs in case of inaction or non-compliance, and what follow-up scrutiny will be carried out in case of red or purple or any other violations.

Transparency of operation

The reporting data should periodically be made available publicly to ensure transparency in monitoring and evaluation of stack emissions.

We are sure, CPCB would consider and acknowledge the suggestions made, and let us know of the action taken. Thanks, with regards

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