NGT MATTER
PRIORITY

SPEED POST

F. No. B-29016/C-08/19/WM-II Div./ 2349 March 08, 2019

To,

The Director (HSM Division)
Ministry of Environment, Forests & Climate Change
2nd Floor, Jal Wing, Indira Paryavaran Bhawan,
Aliganj, Jor Bagh Road, New Delhi-110003

Sub:Follow-up action in the matter of Original Application Number 804/2017 and M.A. No. 1302/2018 (i.e W.P. (C) No. 657/1995)-regarding.

Sir,

This has reference to the (i) orders dated 30/07/2018 of the Hon'ble National Green Tribunal, Principal Bench, New Delhi, in the matter of OA No 804/2017: Rajiv Narayan & Anr. Vs Union of India & Ors, and (ii) orders dated 05/12/2018 in the matter of M.A. No. 1302/2018 in Interlocutory Application No. 63 in W.P. (C) No. 657/1995: The Research Foundation for Science, Technology and Natural Resource Policy Applicant(s) Versus Union of India & Ors, and constitution of the Monitoring Committee. Copies of these orders are available on CPCB website i.e http://cpcb.nic.in/ngt-mc-hw/

The Monitoring Committee has submitted its Interim Report on Management of Hazardous Waste which has been filed in the Hon'ble Tribunal by CPCB in Feb, 2019. The said report contains 209 pages and is available at CPCB website http://cpcb.nic.in/ngt-mc-hw/. The summary of observations and recommendations, as Chapter-7 of the said report, is enclosed herewith for ready reference.

The report recommends urgent/immediate actions especially at items 1(1), and 10(3) and other important actions require to be taken by MoEF&CC.

It is requested to kindly initiate action on the aforesaid urgent/immediate and other important action points as outlined above. Point- wise action taken report on the above listed urgent/immediate action points be submitted to this office or before 31/03/2019. The matter is listed on or before 04/04/2019 in the Hon'ble National Green Tribunal.

Yours faithfully,

(Bharat K Sharma)
Nodal Officer & Member Convener
of the Monitoring Committee

Encl.: As above
Copy to :

PS to MS : *For kind information of MS, please.*

(Bharat K Sharma)

केन्द्रीय प्रदूषण नियंत्रण बोर्ड
निर्गत.....
दिनांक.....12/3/19

7. SUMMARY OF OBSERVATIONS AND RECOMMENDATIONS

The committee has reviewed various aspects of enforcement of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016, for its effective compliance and enforcement. Though, this report is primarily an interim report, the committee thought it necessary to summarise its observations on the issues dealt so far and also, suggest necessary corrective actions for the consideration of the Hon'ble Tribunal to issue suitable directions, if necessary.

Sr No.	Observations	Proposed Actions (Responsible Agency and timeline of action)
1.	**Hazardous waste identification: - Uniformity in assessment, By-products and solvents (Details in Chapter 4 – Section 4.1.1)** a. The Rules define by-products very categorically linking it to its intended use. Presently, there is no verification or appraisal of such continuous intended use before classifying certain waste as a by-product. There is a need for SOP/guidelines for identification of by-products based on the manufacturing process as well as intended use. b. Applicability of various clauses of the HW Rules to the 'other waste' also needs to be defined clearly in the Rules itself. c. Presently, there is hardly any scientific examination or scrutiny for identification and quantification of HW prior to grant of authorisation. d. The HW Rules basically focuses on a close loop approach for the HW Management which is reflected in the adoption of manifest system in order to ensure that the HW movement is continuously tracked till its final disposal (Cradle to Grave approach). e. However, in case of spent solvent sent for solvent recovery, such	1. There is a need to urgently prepare a guidelines or protocol on how to decide the by-product on specific criteria. This can be done based on chemical process involved in order to bring consistency in approach. *(MoEF&CC and CPCB: 06 months)* 2. Other waste is presently missing from all the regulatory actions, including inventory. It is necessary to bring such waste in regulatory domain, as envisaged in the rules. *(SPCBs/PCCs: inventory of 2018-19 onwards)* 3. SPCBs/PCCs need to take steps to ensure closing of the manifests received and reconcile the HW handling data. This work is humungous and need support in terms of software and online submissions. *(SPCBs/PCCs)* 4. Pan India IT based solution is suggested for tracking HW. Such integrated data handling and management solution is under implementation by CPCB which the committee would like to review in next phase. 5. The pre-processing and recycling/utilisation facilities need to be treated as critical environmental infrastructure facilities for sound environmental management of hazardous waste so as to ensure

	manifest system seems to be ending at the door step of the spent solvent recycler. It would be advisable to continue this manifest system right upto the actual user of such recovered solvent from solvent recovery plant to ensure appropriate regulation of spent solvent plant performance and appropriate accounting and use of recovered solvent. The similar approach is also required to be adopted in all cases of recycling/recovery/ utilisation such as used oil, waste oil, lead scrap, spent acid, spent catalyst, etc.	enhanced level and frequency of enforcement and environmental monitoring. Elaborate protocols are needed to be developed. *(SPCBs/PCCs: continuous activity).* 6. According to Rules, the identification and quantification of the hazardous waste generation is to be done at the authorisation stage itself and therefore, it is necessary that SPCBs shall adopt the scientific principles as enumerated for such identification and quantification of HW. (SPCB/PCCs: Immediate)
2.	**Grant of Authorisation by SPCBs/PCCs (Details in Chapter 4 – Section 4.1.2)** a. The Rules stipulates requirement of enclosing field inspection report while granting authorisation b. The committee observed that only in few cases the SPCBs are enclosing the said field inspection report alongwith authorisation granted. c. Further, such filed inspection report lacks details w.r.t to adequacy of the facilities on storage, transportation, treatment, recycling/utilisation, disposal, etc.	1. Uniform format for visits and inspections of HW handling facilities is necessary to ensure comprehensive inspections as per the provisions of the Rules. A format is proposed by the Committee which is given at **Annexure XVI.** 2. The authorisation document should clearly stipulate respective mode of management (such as common or captive incineration/secured landfilling or pre-processing or recycling or utilization or export or captive storage, as applicable) for each category of HW being generated. *(SPCB/PCCs: immediate)*
3.	**Inventory (Details in Chapter 4 – Section 4.2)** a. Inventories are based on reporting by the generators/occupiers through annual report as well as authorisation. b. The inventory data do not cover all the industries who have been granted authorisation. It also does not cover the hazardous waste from domestic sources, interstate movement, import/export of hazardous waste, and other waste.	1. Standard guidelines and protocol based on scientific fundamentals for preparation of inventory should be prepared by CPCB and strictly followed by the SPCBs/PCCs to ensure reliable and credible inventory. *(SPCBs/PCCs and CPCB/: inventory of 2018-19 onwards)* 2. SPCBs/PCCs shall verify and scientifically validate the HW data and facilities before grant or renewal of authorisation. *(SPCBs/PCCs: inventory of 2018-19 onwards)*

	c. The inventories are not verified and validated based on the scientific principles by the State Pollution Control Boards/Pollution Control Committees (SPCBs/PCCs). d. There is a substantial variation in the quantity declared in the authorisation and actual quantity of hazardous waste generation declared in the annual report. e. Quantities reported in the captive utilisation of hazardous waste appear to be on higher side and are not verified. f. There are no standard protocol/guidelines for preparation of HW inventory based on sound scientific principles and approach which is a basic necessity to ensure uniform and consistent preparation of HW inventory by different SPCBs/PCCs.	3. There is an emergent need to develop sectoral process based reasonable HW generation range to have uniformity in assessing the HW generation from industries and benchmarking the same with its peers, rather than solely depending on industry data. *(SPCBs/PCCs: continuous activity)* 4. All occupiers who have authorisations shall submit the Annual report and in case of non-compliance, action needs to be taken by SPCB/PCC. *(SPCBs/PCCs: inventory of 2018-19 onwards)* 5. The timelines for inventory preparation as envisaged in Rules be strictly complied with by SPCBs/PCCs. Preparation of country's inventory by CPCB is dependent on such timely submission by SPCBs/PCCS. *(SPCBs/PCCs and CPCB)*
4.	**Enforcement actions. (Details in Chapter 5)** a. Though there have been several incidents on record of non-compliance of HW Regulations resulting in discharge of HW in environment, the powers vested with the CPCB/SPCBs/PCCs for recovering environmental damages under Rules 23(1) has not been invoked. b. Only three States namely Maharashtra, Telangana and Madhya Pradesh have reported prosecution actions under Section 15 of EP Act, 1986. c. There are hardly few cases where the SPCBs/PCCs have invoked provisions related to revocation and/or refusal of authorisation in view of the observed non-compliances. d. Inspection report, mostly is not attached along with the authorisation granted. Wherever inspection reports have been attached such reports lack in required information for appraisal.	1. SPCBs/PCCs shall invoke the powers conferred under clause 23 (1) and (2) of the Rules, related to all damages caused to the environment or third party due to improper handling and management of the hazardous and other wastes, and non-compliance respectively. CPCB has already issued guidelines for Liability assessment, for invoking clause 23(1) and (2) of HW Rules. CPCB shall also take consequential actions under clause 23 (1) as per the said guidelines wherever directions under section 5 of the E(P) Act have been issued by CPCB, noticing environmental damages. *(SPCBs/PCCs and CPCB: Immediate).* 2. The habitual and serious defaulters shall be prosecuted under provisions of the Environment (Protection) Act, 1986. Other alternative regulatory actions including refusal and revocation of Authorisation can also be explored following the due process. *(SPCBs/PCCs: Immediate)* 3. Non-compliance to be documented while processing authorisation for renewal or inspections in order to invoke powers of refusal or revocation of Authorisation as per Rules.

		(SPCBs/PCCs: Immediate) 4. Urgent updation of concerned websites of SPCBs/PCCs/CPCB with respect to all enforcement actions along with details of industries and action taken. *(SPCBs/PCCs/ CPCB: Immediate)* 5. There is need to have an enforcement framework for effective enforcement of Rules based on principle of proportionality and also, precautionary principle. Such framework will remove ambiguity in regulatory actions and bring transparency, predictability and consistency in enforcement for actions. *(SPCBs/PCCs/CPCB: within 06 months)*
5.	**Hazardous waste utilisation and recycle. Issues and need of improvements (Details in Chapter 4 – Section 4.3)** a. The inventory data shows skewed variation in utilisation of HW pattern among different States. For example in Gujarat about 36 % of the HW generated is either recycled or utilised, whereas in Maharashtra 0.98 % HW generated is recycled and utilised. b. Maharashtra is not authorising and promoting the co-processing which is one of the major option of utilisation of HW, although the HW Rules provided hierarchy of waste management promoting recycle and utilisation of the HW. There is a need to have a consistent and scientific approach to promote the HW recycle and reuse in consonance of the objective of the HW Rules expressed in terms of hierarchy, throughout the country. c. There are certain environmental risks associated with the recycle and utilisation of the HW in case of non-compliance. It is therefore necessary that such recycle and utilisation of HW is strictly regulated in terms of the performance of such recycle and utilisation.	1. The inventory data needs to be verified and validated before accepting the same. The states shall adopt the proposed guidelines immediately while preparation of HW inventory. *(SPCBs/PCCs: Immediate)* 2. There is emergent need of consistent approach in recycle and utilisation of HW in terms waste management hierarchy mandated in the rules across all the States in order to ensure the level playing field for the industry. This can be achieved by advocacy programme such as concept of waste exchange banks, know your waste programme, circular economy, documentation of the success stories along with regulatory interventions wherever required. (SPCBs/PCCs) 3. It is also necessary to develop certain benchmarks/guidelines for the possibilities of HW recycle/utilisation on case to case basis. For example, for co-processing at Cement plants the Thermal Substitution Ratio (TSR) can be an objective criterion to decide the potential to use HW for utilisation purpose. The range of TSR at different cement plants can be collated to develop a database for sound co-processing practices. *(SPCBs/PCCs)* 4. The concept of environmental benchmarking among the similar industries generating HW can be useful

	d. There is need to immediately prepare guidelines for high volume low impact waste like slags from pyrometallurgical operations, fly ash, red mud, Jarosite, mine tailings and ore beneficiation rejects. e. More clarity is required on the application of Rule 9 particularly in case of captive utilisation. Presently, it is very difficult for SPCB/PCC field staff to investigate and analyse such claims of industry. Therefore, presently, the data given by industry is relied upon in totality. f. The pre-processing facilities collect the HW from different industries and carry out the homogenization/blending activities to achieve the required calorific value and other desired specification for co-processing. As this industry sector indulge in handling the wide range of wastes from different industries, it would be prudent to have improved enforcement regime in terms of number of inspections, detailing of inspection, environmental monitoring and reporting of waste receive/disposed etc. on the lines of common facilities.	to ensure consistency and uniformity. The emerging trend of circular economy would be a key intervention for rationalising the HW generation and reuse/utilisation *(SPCBs/PCCs: continuous activity)*
6.	**Common Treatment, Storage and Disposal facilities: reporting. (Details in Chapter 4 – Section 4.5)** a. The Committee has observed that in some cases the TSDF rejects the consignment received from the waste generator for non-compliance of acceptance criteria. This consignment is returned back to the waste generator. b. The site selection criteria, design and layout are the critical parameters for establishment of the TSDF. In addition, waste storage, stabilisation, landfilling, incineration and leachate management are critical operations. The committee has observed non-	1. The practice of returning the HW consignment needs to be immediately stopped and the consignment needs to be stored within the TSDF with information to the waste generator and also the concerned SPCB. The TSDF shall take appropriate measures to dispose this waste at the risk and cost of the waste generator under due information to the SPCB immediately on priority. Though the present guidelines prescribed that the waste shall be sent back to the waste generators, this practice needs to be immediately discontinued in view of non-accounting of the waste once it is out of manifest protocol and the associated environmental risks. *(SPCBs/PCCs/TSDFs: immediate)*

	compliance of these guidelines For example TSDF at Balotra, Roorkee, Kanpur, etc. c. Of 18 SPCBs/PCCs having common secured landfills, 06 SPCBs have still not opened Escrow Account provision for post-closure monitoring of common SLF. d. Compliance of the Hon'ble NGT orders dated 30/07/2018 with regard to setting of TSDFs and taking imitating actions against erring units- Only Goa and Odisha have submitted action plan with timeframe for setting of Common SLF + Incinerator and Common Incinerator respectively. Only Odisha has taken action against erring units.	2. SPCBs/PCCs shall conduct environmental audit including the site selection criteria, design and layout for the TSDFs in next one year. They can engage expert institutes for the purpose and seek CPCB's technical advice on the ToR of the study, if required. *(SPCBs/PCCs: 01 year)* 3. All the Common SLF shall disclose the mandatory amount deposited in Escrow Account annually to SPCB/PCC, CPCB and display on their website. SPCB/PCC to take action in case of non-compliance. *(SPCBs/PCCs: immediate)* 4. It is necessary that the Hon'ble NGT orders dated 30/07/2018 with regard to setting up of TSDF and taking imitate actions against erring units be strictly complied with by the concerned State/UT Government and SPCBs/PCCs. *(State/UT Governments and SPCBs/PCCs: immediate)*
7.	**Contaminated sites: Status, identification, need of urgent action, investment, capacity building, guidelines. (Details in Chapter 4 – Section 4.7)** The Committee has initiated work on monitoring of direction of the Hon'ble Supreme Court with regard to contaminated site WP 657/1995 and has discussed the matter with SPCBs/PCCs/CPCB and the petitioner Shri Sanjay Parikh, Adv. The Committee recognised the monitoring of this aspect has a large scope and the committee intends to focus on this specific issue in coming days. In the mean-time committee has made following preliminary observations and record the need of immediate interventions. a. MoEF&CC/CPCB have identified total 329 potentially hazardous	1. It is necessary that such contaminated site database is developed after due verification by SPCBs/PCCs and validation by CPCB or some expert third party, so as to ensure the reliability of such data base. The entire process of screening, verification and validation needs to be as per standard protocol and the data needs to be owned by both SPCB/PCC and CPCB, not leaving the things at state level alone. *(SPCBs/PCCs/CPCB: continuous activity)* 2. CPCB should update national priority list of such confirmed contaminated sites. *(CPCB: continuous activity)* 3. Concerned SPCBs/PCCs shall identify the responsible person/industry, for each of these contaminated sites for suitable application for polluter pays principle for the remediation programme in line with the CPCB guidelines 'Implementing Liabilities for Environmental Damages & Disposal of Hazardous Waste and Penalty'.

	waste contaminated sites and subjected them for screening based on verification by the SPCBs. After the verification by SPCBs, the total 144 sites have been identified as contaminated sites and 57 sites are still under evaluation. The Committee is of the opinion that the identification of the contaminated sites is an elaborate process involving objective criteria and standard protocols. It is expected that SPCBs and CPCB shall follow such objective criteria and standard protocol to identify the contaminated sites and also to assess their scope and extent of contamination. b. Out of 144 identified contaminated sites, CPCB has prioritised 8 sites for which DPR for assessment and remediation has been prepared. However, there is an urgent need to execute this remediation plan on top priority. The Committee has been informed that the required financial resources for such remediation have not been mobilised so far. c. There is a change in number of such identified sites over the period which could be due to listing/ delisting of probable contaminated sites as a result of increased enforcement and monitoring activities, and variations in criteria.	*(SPCBs/PCCs: Immediate and continuous activity)* 4. Both SPCBs and CPCB shall continue the process of identification of probable contaminated sites and subject them to identification criteria and decide their status as well as scope and extent of such contamination. This process is a dynamic and need to be a regular feature of enforcement. *(SPCBs/PCCs and CPCB: continuous activity)* 5. In case of the contaminated sites where the polluter is not identified, the State/UT Government would be required to finance remediation of such sites to safeguard the people living in contaminated areas from adverse health effects, in terms of their constitutional responsibility to protect and improve the environment. *(States/UTs Government and SPCBs/PCCs)* 6. SPCBs/PCCs need to initiate immediate intervention measures for containing immediate threats from existing contaminated sites (in both active and inactive sites) and also further ingress of HW. *(SPCBs/PCCs: immediate)*
8.	**Impact of other regulations (Details in Chapter 4 – Section 4.2)** The committee notes that HW resulting from enforcement of other regulations like E-waste, SW rules etc are presently not accounted in the HW management plans under HW rules. Committee finds a need to consider impact of other regulations while planning HW management including preparation of inventory and assessing the impacts.	SPCBs/PCCs and CPCB need to take cognizance of these aspects while enforcing the relevant rules and also, preparation of HW inventory and other interventions. *(SPCBs/PCCs and CPCB)*

	a. As per E-waste regulation, in case of fluorescent and other mercury containing lamp where recyclers are not available, such waste is channelized to common TSDF for disposal after pre-treatment/immobilization of mercury. Such waste should also be accounted into HW inventorisation. b. In case of solid waste rules, there is a separate category of domestic HW which is expected to be disposed in the Common Hazardous facility, however, there is no data or information available on the quantity and quality of such domestic HW available so far.	
9.	**Import and export. (Details in Chapter 4 – Section 4.6)** a. Harmonization of Basel codes with ITC (HS codes): The Ministry (MOEF) provides permission on the basis of Basel codes while DGFT uses HS codes. There is a need to synchronize the two codes to avoid confusion. b. Risk management assessment: The customs authorities use the risk management system (RMS) to enable low risk consignments to be cleared based on the acceptance of the importer's self-assessment and without examination. Roughly 30 percent of containers covered under risk management out of which 10 percent are physically verified. There are different types of waste streams which have not been integrated in the RMS. There is a need to review the import/export data of various waste streams and include them in RMS. Further, waste streams in Schedule III – Parts A, B and D and Schedule VI that are often mis-declared by importers need to be identified and added to the RMS. c. Collaboration between regulating authorities: Regular interaction between the Ministry of	Committee would deliberate on this issue further for making detailed recommendations. Still however, following recommendations on co-ordination and data management are made; 1. There is need to synchronise Basel code and HS codes to cover all scheduled items as per HW rules in customs verification and control more effectively. *(MoEF&CC, Custom and Port Authorities)* 2. CAG has come out with details of illegal HW import and its storage in ports and ICDs. This needs to be verified on priority and action be taken for disposal of the same in terms of earlier orders of Hon'ble Supreme Court. *(Custom and Port Authorities)* 3. Improve traceability of importers: The Customs authorities could make the registration process of importers more stringent as there have been cases where importers have never been able to be traced when their illegal imports were intercepted *(MoEF&CC, DGFT, Custom and Port authorities)*

	Environment, Forest and Climate Change, CPCB, SPCBs/PCCs, customs and ports authorities should take place with frequent consultative meetings and trainings in order to avoid working in silos.	
10.	**Capacity building in CPCB and SPCBs/PCCs and other agencies (trained adequate manpower, laboratory, budget) (Details in Chapter 4 – Section 4.7 and 4.8)**	1. Each of the SPCBs/PCCs/Custom/TSDF, as listed in report, need to have at least one laboratory where all HW parameters as required under the Rules can be analysed. *(SPCBs/PCCs/Custom/TSDF: 06 months)* 2. Capacity building in SPCBs/PCCs for rapid preliminary assessment of contaminated sites, which may include practical training on use of tools for soil and groundwater screening such as hand-held XRF instruments, Colorimeter, PID for VOCs/ SVOCs, hand operated augers, groundwater pumps, level meters, etc. *(CPCB: 06 months)* 3. SPCBs/PCCs and CPCB needs capacity building in terms of qualified and experienced manpower and also, tools and techniques for effective governance. Committee is informed about steps being taken by SPCBs and would review the same in detail. *(MoEF&CC, State/UT Government, CPCB and SPCBs / PCCs: Immediate)*
11.	**Duties performed by State/UT Govt. as stipulated under the HOWM Rules, 2016** **(Details in Chapter 5)** The State Govts. have been entrusted with duties of authorising Dept. of Industry/other Govt. agency and Dept. of Labour/other Govt. agency with regard to allocation/earmarking of industrial space, recognition/ registration/ health & safety/etc. of workers involved in recycling/ pre-processing/ other utilization activities of HW and submission of integrated	1. There is need to sensitize State/UT Govts. about duties required to be performed by the concerned department/agency as stipulated under Rule 5(1), 5(2), 5(3) and Schedule VII of the HOWM Rules, 2016. Hon'ble NGT may issue appropriate directions in this regard. *(All State/UT Govts.: Immediate)*

	plan under Rule 5(1), (2) and (3) respectively: The State Govt. has also been entrusted with duties of identification and notification of sites for common TSDF and publishing periodically inventory of disposal sites as stipulated under Schedule VII of the HOWM Rules, 2016. It has been observed that actions have not been taken on the above (except identification and notification for common TSDFs in few States) by the State/UT Govt. and there is lack of awareness among them in this regard.	

FORMAT FOR INSPECTION OF INDUSTRIES WITH REGARD TO GENERATION AND MANAGMENT OF HAZARDOUS WASTES

S.No	Particulars	Status / details
1.	Name of Industry	
2.	complete postal address of the industry	
3.	Website	
4.	Tel and Fax Number	**Telephone No.1:** **Telephone No.2:** **Fax:**
5.	longitude and latitude	
6.	E-mail	
7.	Date of Visit	D D M M Y Y Y Y
8.	Contact Person Name, Designation and Contact No	**Name** **Designation** **Contact No.**
9.	Name and Designation of	**Sr. No** | **Name of Person** | **Designation**

S.No	Particulars	Status / details
	the Officials visiting the Unit	1 2 3 4
10	Process description in brief for each Product. Also attach Process Flow Diagram indicating raw materials and sources of hazardous waste generation along with mass balance.	
11	Year of commissioning	D D M M Y Y Y Y
12	Production (in MT or KL / day) of each product	Sr. No / Product / MT/day or Month or Annum / Operational status 1 2 3 4
13	Status of consent under the Water Act, 1974	**Date of issue** D D M M Y Y Y Y **Validity** D D M M Y Y Y Y
14	Status of consent under the Air Act, 1981	**Date of issue** D D M M Y Y Y Y

S.No	Particulars	Status / details
		Validity D D M M Y Y Y Y
15	Status of Authorization under the Hazardous Waste (Management, Handling & Transboundary Movement) Rules, 2008 (HWM Rules, 2008) / Hazardous & Other Wastes (Management & Transboundary Movement) Rules, 2016 (HOWM Rules 2016) and details of Hazardous Waste (HW) authorized (please also attach copy of authorization)	**Date of issue** D D M M Y Y Y Y **Validity** D D M M Y Y Y Y

S.No	Name of HW	Category	Quantity	Mode of Treatment & Disposal/Recycling/Reuse/etc.
1.				
2.				
3.				
..				

16	Name and Categories of HW generated and their respective quantity (Please specify all types of HW generated from the unit along with category as per Schedule I or II of the	The details of various categories of hazardous wastes generation and their quantity, as verified the inspecting team during the inspection are as below in Table 1:

Sl. No.	Various Production Plant/ Process at the facility	Name of HW (with category) generated in Tonne and their quantity per tonne of inputs*	HW generation (in Tonne) per tonne of the consented product	HW generation as per the consented capacity of the product (Tonne per day or month or annum)	Actual quantity of products produced or inputs used		Actual Quantity of generated	
					During current financial year (as on date of inspection)	During previous financial year	During current financial year (as on date of inspection)	Duri prev fina year
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
					Produ ct / Input	Produ ct / Input		

S.No	Particulars	Status / details
	HOWM Rules 2016)	

1.											
2.											
3.											
4.	ETP (KLD)										
5	Utilities										
6	Other										

*Please give name and quantity of each of the inputs for each rows of the above table. In case of recycling/utilization/pre-processing/co-processing units, the inputs would also include HW being procured and used in deriving products

Note: *Column (3) and (4) are to be derived as per mass balance and verified during the inspection. Column (6) and (7) are to be derived from Column (3) or (4), as applicable*

17	Captive Recycling/ Utilization/ Incineration/ Secured Landfilling facility details	If yes, please specify details of such facilities including compliance details as per the Rules and CPCB guidelines (please refer checklist):
18	Details of HW storage, Quantity of HW Stored and period of storage	1. Storage facility details and capacity: (i) Lined /Unlined : (ii) Open/Covered and safe from rain water intrusion : (iii) Capacity : Size L x W x H and quantity in Tonne it can store (iv) In case of incinerable hazardous waste storage, comment on compliance of CPCB guidelines (refer checklist): 2. Details of HW Stored:

Table2: Details of HW Stored

Sl. No. (10)	Name & Category of HW (as per column (3) of Table 1) (11)	Actual HW generated in Tonne (sum of column (8) and (9) of Table 1) (12)	Previous Stock (in Tonne) stored in Storage shed (at the beginning of previous financial year) (13)	Actual quantity (in Tonne) found stored on the day of inspection (14)	Balance (in Tonne) (Column 13 + Column-Column14) (15)	Latest date of transfer of HW to authorised Recycler/ Co-processor/ TSDF/etc. (16)
1						
2						

<table>
<tr><th>S.No</th><th>Particulars</th><th>Status / details</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>3</td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
</table>

3. Comments on whether HW is being sent to authorized Recycler/ Co-process TSDF/etc. timely in compliance with Rule 9 of the HOWM Rules :
</td></tr>
<tr><td>19</td><td>Categories and quantity of HW sent to authorized actual user/Common TSDF</td><td>
1. Details of the authorized actual user* /Common TSDF, as applicable, whom HW sent:

Table 3A: Details of authorized actual user and TSDF
<table>
<tr><th>Sr. No.
(17)</th><th>Name & address of the authorized common TSDF/Actual User*
(18)</th><th>Name of SPCB/PCC who granted authorization to the authorized TSDF/Actual User* and authorization no. with its validity
(19)</th><th>Activities for which authorisation granted to the authorized TSDF/Actual User* (Specify among Transportation/ Recycling/ Utilization/ Pre-processing/ Co-processing/ Incineration/Secured landfilling)
(20)</th><th>Name & categories o HW for which authorization granted to the authorized TSDF/Actual User*
(21)</th></tr>
<tr><td>1</td><td></td><td></td><td></td><td></td></tr>
<tr><td>2</td><td></td><td></td><td></td><td></td></tr>
<tr><td>3</td><td></td><td></td><td></td><td></td></tr>
</table>
*Actual user includes occupier who procures and processes HW for reuse, recycli recovery, pre-processing, utilisation including co-processing.

2. Details of HW sent to the authorized actual user and TSDF, as applicable, since previ financial year (as per daily /annual record and manifest document Form 10): Please applicable data in Table 3B as attached with this format separately.
</td></tr>
<tr><td>20</td><td>Compliance w.r.t. labeling, manifest system, records, annual returns, etc.</td><td>
Please make observations on the below:
1. Adequate packaging of HW
2. Labeling of HW containers in Form 18
3. Compliance of all Manifest Documents and sending/receiving of the same to concerned when HW are being sent (refer Rule 19 of the HOWM Rules, 2016)
4. Transportation of HW only by authorized sender or receiver
5. NOC from the concerned SPCB/PCC if HW are sent for disposal to other State/UT
6. Intimation to both the SPCBs/PCCS before handing over the waste to the transpo incase HW is sent for recycling or utilisation including coprocessing
7. Prior intimation to SPCBs/PCCs of the States/UTs of transit incase of inters transportation
8. Transportation of HW and compliance with Rules under Motor Vehicles Act, 1988
</td></tr>
</table>

<table>
<tr><th>S.No</th><th>Particulars</th><th>Status / details</th></tr>
<tr><td></td><td></td><td>9. Daily records maintenance in Form 3
10. Timely submission of annual returns in Form 4 to the SPCB/PCC</td></tr>
<tr><td>21</td><td>Safety facilities provided at storage facility</td><td><table><tr><th>Sr. No</th><th>Safety Facility</th></tr><tr><td>1</td><td></td></tr><tr><td>2</td><td></td></tr><tr><td>3</td><td></td></tr><tr><td>5</td><td></td></tr><tr><td>6</td><td></td></tr><tr><td>7</td><td></td></tr></table></td></tr>
<tr><td>22</td><td>Environmental Monitoring</td><td>Please comment on results of ground water sampling; soil sampling; stack emission monitoring conducted by SPCB/PCC or EPA notified lab in presence of SPCB/PCC officials</td></tr>
<tr><td>23</td><td>Details of HW contaminated sites, if any, within and outside the industry premise</td><td></td></tr>
<tr><td>24</td><td>Remarks</td><td>Please write down non-compliances, significant observations and recommendations</td></tr>
</table>

Place :

Date:

Signature

(Name and designation of inspecting official)

Table 3B: Details of HW sent to authorized actual user and TSDF listed in Table 3A since previous financial year till date of inspection

S. No.	Name of HW & Category (as per column 2 of the Table 2)	Quantity recycled/ Utilized/ Disposed in captive facility (in Tonne)			HW sent for Recycling/ Utilization/ Pre-processing/ Co-Processing/ Incineration/ Secured Landfilling in Tonnes and to whom							Total HW recycled/Utilized in captive facility and sent to other authorized facility (Sum of column 24 to 33)	Quantity of hazardous waste store within the premises (as per column 15 of the Table 2)
		Incinerated	Secured Landfilled	Recycled/ Utilized	Recycling	Utilization	Pre-processing	Co-Processing	Incineration	Secured Landfilling	Sent to whom (please specify Sl. No. of Table 3A)		
(22)	(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)	(33)	(34)	(35)
1.													
2.													

*Comments on difference between (Column 15 of Table 2/Colum 35- Column 34)