BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH, NEW DELHI

O. A. No. 230 OF 2026

(IA No. 276/2026)

In the matter of:

Dr. Amit Kumar …Applicant

Versus

State of Uttar Pradesh & Ors. …Respondents

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S. No	Particulars	Page No.
1.	**Response** on behalf of CPCB respondent no. 2, Central Pollution Control Board, (CPCB) in compliance to Hon'ble NGT order dated 10.04.2026 in Original Application No. 230/2026 (I.A No.276/2026).	
2.	**Annexure I-** A Copy of Hon'ble NGT order dated 10.04.2026 in O.A No. 230/2026.	
3.	**Annexure II-** A copy of reply filed by CPCB in O.A No. 266/2025.	
4.	**Annexure III-** A copy of new TPO units in section 2.1 of the SOP.	

Filed by Advocate Suman Arora
On behalf of Central Pollution Control Board

Place: Delhi
Dated: 26.05.2026

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH, NEW DELHI

O. A. No. 230 OF 2026

(IA No. 276/2026)

In the matter of:

Dr. Amit Kumar ...Applicant

Versus

State of Uttar Pradesh & Ors. ...Respondents

RESPONSE ON BEHALF OF RESPONDENT No. 2 i.e., CENTRAL POLLUTION CONTROL BOARD

Most respectfully showeth:

1. That the Hon'ble National Green Tribunal, Principal Bench (hereinafter referred to as the "Hon'ble NGT") vide order dated 10.04.2026 has sought the response of Central Pollution Control Board (hereinafter referred to as "CPCB") in the instant matter. Thereby, the response is made in succeeding paragraphs. A copy of the Order dated 10.04.2026 is appended herewith as **ANNEXURE I.**

BACKGROUND:

2. In the present application, the petitioner has alleged that M/s Adideva Carbon LLP (Respondent No.8) has constructed and operating a Tyre Pyrolysis Plant with a capacity of 230 metric tonnes per day at Khasra Nos. 454, 455, 457, 459 and 464 of Village Sakauti, District Shamli, Uttar Pradesh, which is within a Notified Reserved Forest vide Gazette Notification No. 5527/XIV dated 22nd October 1955 under the Indian Forest Act 1927. The petitioner has also challenged illegal grant of the CCA (Consolidated Consent & authorization) dated 04/04/2026 under the

Water (Prevention & Control of Pollution) Act, 1974 and the Air (Prevention & Control of Pollution) Act, 1981, Authorization under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 notified under Environment (Protection) Act, 1986 by the respondent No. 3 i.e., Uttar Pradesh Pollution Control Board (UPPCB).

3. That at the outset, the Answering Respondent denies all claims, contentions, allegations and averments against Answering Respondent CPCB in the above OA, contrary to anything stated or submitted in this response. Nothing in the OA may be deemed to have been accepted or admitted by the Answering Respondent for want of a specific denial or on the ground of non-traverse, save any averment which has been expressly admitted hereinafter.

4. That, CPCB is constituted under the Water (Prevention and Control of Pollution) Act, 1974 (hereinafter referred to as "the Water Act, 1974"). It performs the functions under the Water Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981 (hereinafter referred to as "the Air Act, 1981"), and the Environment (Protection) Act, 1986.

5. That the State Pollution Control Boards/Pollution Control Committees (hereinafter referred to as "SPCBs/PCCs") have been constituted in States / Union Territories under the Water Act, 1974 and the Air Act, 1981 and are empowered to perform the functions and implement the provisions of these Acts in respect of their Territorial Jurisdiction.

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N.C.T. of Delhi
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RESPONSE

6. The petitioner has already filed an OA No. 266/2025 before the Hon'ble NGT against M/s Adideva Carbon LLP, challenging the sitting of this unit on Environmental grounds and alleged that siting criteria as provided in the Revised Standard Operating Procedure (SOP) for Recycling of Waste Tyre Scrap for the recovery of Tyre Pyrolysis Oil, Pyro Gas and Char in Tyre Pyrolysis Oil (TPO) Units issued by CPCB on 16.01.2024 has been violated in this regard. In the said matter also, CPCB was impleaded at Respondent No. 2. The Hon'ble NGT vide its order 28.05.2025 directed all the respondents for filing their response/reply by way of affidavit before the Tribunal. In compliance of the Hon'ble NGT directions, CPCB as Respondent No.2 filed its affidavit before the Hon'ble NGT on 01.09.2025. CPCB in its reply affidavit has referred to its revised Standard Operating Procedure (SOP) for Recycling of Waste Tyre Scrap for the recovery of Tyre Pyrolysis Oil, Pyro Gas and Char in Tyre Pyrolysis Oil (TPO) Units dated 16.01.2024. CPCB submitted that it has explicitly defined sitting criteria for establishment of new Tyre Pyrolysis Plants and the same was elaborated in the said reply. A copy of the reply by CPCB in OA 266/2025 is appended herewith as **ANNEXURE II.**

7. CPCB has already issued revised Standard Operating Procedure (SOP) for Recycling of Waste Tyre Scrap for the recovery of Tyre Pyrolysis Oil, Pyro Gas and Char in Tyre Pyrolysis Oil (TPO) Units dated 16.01.2024. The revised SOP focused on upgradation of environmental & safety performance of the Tyre Pyrolysis units across the country. Further CPCB, vide email dated 19.01.2024 and letter dated 20.03.2024 circulated these revised SOPs to all SPCBs/PCCs for immediate implementation.

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8. CPCB also issued direction dated 29.04.2025 under section 5 of the Environment Protection Act 1986 to all the SPCBs/PCCs wherein it has been directed for the compliance of its revised SOPs.

9. That CPCB in its SOP has explicitly specified criteria for sitting of new TPO units in section 2.1 of the SOP, a copy of which is being appended herewith as **ANNEXURE – III.**

10. As per the information available at Waste Tyre EPR Portal, M/s Adideva Carbon LLP has applied for registration on Waste Tyre EPR portal as required under Para 2 & 3 of Schedule-IX - Utilization and Management of Waste Tyre notified under the Hazardous & Other Wastes (M&TM) Amendment Rules, 2022. However, CPCB has not granted it registration so far.

11. The CCA (Consolidated Consent & authorization) dated 04/04/2026 under the Water Act, 1974 and the Air Act, 1981, Authorization under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 has been issued by the concerned SPCBs/PCCs i.e., UPPCB and the same is not under the ambit of the CPCB.

12. In the present OA No. 230/2026, the issue is majorly related to establishment of the Unit within a Notified Reserved Forest vide Gazette Notification No. 5527/XIV dated 22nd October 1955 under the Indian Forest Act 1927. The averments made in the present application are majorly concerning to Respondent No.3 and R4 i.e., UPPCB, Respondent No. 6 i.e., Divisional Forest Officer, Shamli, Respondent No. 8, i.e., M/s

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Adideva Carbon LLP and Respondent No. 9 i.e., Principal Chief Conservator of Forests (PCCF) , Uttar Pradesh. Therefore, the response from the said respondents may kindly be considered in this regard for adjudication of the instant matter.

13. That, in light of the above submissions, it is respectfully submitted that this Answering respondent i.e. CPCB, shall abide by all order(s) or direction(s) passed by this Hon'ble Tribunal in the instant OA.

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Deepti Kapil
Scientist 'E'
Central Pollution Control Board

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH, NEW DELHI

O. A. No. 230 OF 2026

(IA No. 276/2026)

In the matter of:

Dr. Amit Kumar ...Applicant

Versus

State of Uttar Pradesh & Ors. ...Respondents

AFFIDAVIT

I, Deepti Kapil, in the capacity of Scientist-E, having office at the Delhi, Central Pollution Control Board, Parivesh Bhawan, East Arjun Nagar, Delhi, do hereby solemnly affirm and sincerely state on oath as follows:

1. That I, the deponent herein, is well conversant with the facts and circumstances of the present case on the basis of the information derived from the official records, and hence, I am competent to verify, sign and swear this affidavit on behalf of the Respondent CPCB.

2. That the accompanying response may be read part and parcel of the present affidavit.

3. That the accompanying response has been drafted and filed under my instructions, the contents thereof are true and correct on the basis of the records maintained during ordinary course of business of CPCB and available records and documents and the contents of the same are read over and explained to me and are not repeated herein for the sake of brevity.

NOTARY PUBLIC
R.L. Chaudhary
N.C.T. of Delhi
Regd. No. 1513
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दीप्ती कपिल / Deepti Kapil
वैज्ञानिक 'इ' / Scientist 'E'
केंद्रीय प्रदूषण नियंत्रण बोर्ड
Central Pollution Control Board
(पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय, भारत सरकार)
(M/o Environment, Forest & Climate Change, Govt. of India)
परिवेश भवन, पूर्वी अर्जुन नगर, दिल्ली-110032
Parivesh Bhawan, East Arjun Nagar, Delhi-110032

DEPONENT

VERIFICATION:

Verified at Delhi on this 26 MAY 2026 day of _____ 2026 that the contents above are correct and true on the basis of the records of the case as mentioned in the day-to-day affairs of the CPCB. Nothing has been concealed therefrom or mis-stated.

NOTARY PUBLIC
R.L. Chaudhary
N.C.T. of Delhi
Regd. No. 1513
GOVT. OF INDIA

ATTESTED
NOTARY PUBLIC
GOVT. OF INDIA
26 MAY 2026

DEPONENT

दीप्ती कपिल / Deepti Kapil
वैज्ञानिक 'ई' / Scientist 'E'
केन्द्रीय प्रदूषण नियंत्रण बोर्ड
Central Pollution Control Board
(पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय, भारत सरकार)
(M/o Environment, Forest & Climate Change, Govt. of India)
परिवेश भवन, पूर्वी अर्जुन नगर, दिल्ली–110032
Parivesh Bhawan, East Arjun Nagar, Delhi-110032

Item No. 5 Court No. 1

BEFORE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

Original Application No. 230/2026
(IA No. 276/2026)

Dr Amit Kumar Applicant

Versus

State of Uttar Pradesh & Ors. Respondent(s)

Date of hearing: 10.04.2026

CORAM: HON'BLE MR. JUSTICE PRAKASH SHRIVASTAVA, CHAIRPERSON
HON'BLE DR. AFROZ AHMAD, EXPERT MEMBER

Applicant: Dr. Amit Kumar, Applicant in Person (Through VC)

Respondents: Ms. Dippt Anubhuti, Adv. on behalf of Ms. Priyanka Swami, Adv. for R - 1, 5, 6, 9 & 10

ORDER

1. In this Original Application, the applicant has alleged that the Respondent No. 8-Tyre Pyrolysis unit is operating within a notified reserved forest. In support of the submission that the Respondent No. 8 is operating within the reserved forest, the applicant appearing virtually has referred to the notification dated 13.10.1955 (page 38). Further plea has been raised by the applicant that consolidated Consent to Operate dated 04.04.2026 has been illegally granted to the Respondent No. 8 by the Respondent No. 4. The applicant appearing virtually has referred to special condition No. 7 of the Consent to Operate and has submitted that mearly by noting that the land is 'Transferrable Bhumidhari Land', the consent has been granted whereas the applicant vide communication dated 02.03.2026 (page 33) had already informed the concerned authorities about the land falling in the reserved forest. He had subsequently without considering it, the CTO dated 04.04.2026 has been granted. He has also relied upon Paragraph 24 and 26 of the order of the Hon'ble Supreme Court

dated 05.10.2021 passed in Civil Appeal No. 7017 of 2009 in the matter of Prabhagiya Van Adhikari Awadh Van Prabhag vs. Arun Kumar Bhardwaj (Dead) Thr. Lrs. & Ors.

2. It has also been pointed out that the OA No. 266/2025 objecting to the setting up of the Respondent No. 8 on the ground of citing criteria is already pending before the Tribunal.

3. Issue notice to the respondents.

4. Ms. Dippt Anubhuti, proxy counsel appearing on behalf of Ms. Priyanka Swami, Adv. for Respondent No. 1, 5, 6, 9 and 10 accepts notice and seeks four weeks' time to file the reply.

5. The applicant is directed to serve the other respondents and file affidavit of service at least one week before the next date of hearing.

6. List along with OA 266/2025 on 28.05.2026.

Prakash Shrivastava, CP

Dr. Afroz Ahmad, EM

April 10, 2026
Original Application No. 230/2026
(IA No. 276/2026)
P

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH, NEW DELHI

ORIGINAL APPLICATION NO. 266 of 2025

In the matter of:

Dr. Amit Kumar **Applicant**

Vs

State of U.P. & Ors. **Respondent**

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1.	**Reply** in Original Application No. 266/2025, on Behalf of Central Pollution Control Board (CPCB) respondent no. 2 in compliance to Hon'ble NGT order dated 28.05.2025.	
2.	**Annexure-I:** A copy of Hon'ble NGT order in OA No. 266/2025 dated 28.05.2025.	
3.	**Annexure-II:** A copy of letter dated 25.08.2025 issued by CPCB to UPPCB.	
4.	**Annexure-III:** A copy of inspection report.	
5.	**Annexure-IV:** A copy of email dated 19.01.2024.	
6.	**Annexure-IV:** A copy of letter dated 20.03.2024 issued by CPCB to all SPCBs/PCCs.	

(Filed by Adv. Suman Arora)
On behalf of the Central Pollution Control Board

Place: Delhi
Date: 01.09.2025

BEFORE THE HON'BLE NATIONAL GREEEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 266/2025

In the matter of:

Dr. Amit Kumar **Applicant**

Vs.

State of U.P. & Ors. **Respondent**

REPLY ON BEHALF OF CENTRAL POLLUTION CONTROL BOARD (CPCB) RESPONDENT No. 2.

1. That the Hon'ble National Green Tribunal, Principal Bench (hereinafter referred to as the "Hon'ble NGT") vide Order dated 28.05.2025 in Original Application (hereinafter referred to as "OA") No. 266/2025 has sought the reply of CPCB in the said OA. Thereby the reply is made in the succeeding paragraphs. A copy of the Hon'ble NGT Order dated 28.05.2025 is annexed herewith as **ANNEXURE – I.**

2. That by the said order dated 28.05.2025; the Hon'ble Tribunal addressed the grievances raised by the applicant against the Tyre Pyrolysis Plant, M/s Adideva Carbon LLP, located at Khasra No. 454, 455,457 459 and 464, Village Sakauti, District Shamli, Uttar Pradesh.

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3. That at the outset, the answering respondent denies all claims, contentions, allegations, and averments against the answering respondent, CPCB in the above OA, contrary to anything stated or submitted in this reply. Nothing in the OA may be deemed to have been accepted or admitted by the answering respondent for want of a specific denial or on the ground of non-traverse, save any averments which has been expressly admitted hereinafter.

4. That CPCB is a statutory Board constituted under the Water (Prevention and Control of Pollution) Act, 1974. It performs the functions under the Water (Prevention and Control of Pollution) Act, 1974 (hereinafter referred to as "Water Act, 1974"), the Air (Prevention and Control of Pollution) Act, 1981 (hereinafter referred to as "Air Act, 1981") and the Environment (Protection) Act, 1986.

5. That the State Pollution Control Boards/Pollution Control Committees (hereinafter referred to as "SPCB/PCCs") have been constituted in States/Union Territories under the Water Act, 1974 and the Air Act, 1981 and are empowered to perform functions and implement the provisions of these Acts in respect of their territorial jurisdictions. Under Section 21 of the Air Act, 1981, it is mandatory that no person shall, without the previous consent of the State Board/PCC establish or operate any industrial plant in an air pollution control area.

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PARA WISE REPLY:

6. That averments made in paras 1 and 2 of the OA pertain to the introduction of the applicant and respondents. Hence, need no comments by this answering respondent.

7. That averments made in paras 3 and 4 of the OA are related to the introduction of Respondent no. 8, i.e., M/s Adideva Carbon LLP, located at Khasra No. 454, 455. 457, 459 and 464, Village Sakauti, District Shamli, Uttar Pradesh. Hence, no comments are offered by this answering respondent.

8. That the averments made in paragraphs 5 and 7 of the original application state that the proposed site is in close proximity to several environmentally and socially sensitive locations. In this regard, it is humbly submitted that for the establishment and operation of a waste tyre pyrolysis plant, it is mandatory to obtain Consent to Establish (CTE) and Consent to Operate (CTO) under the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, and authorization under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 from the concerned State Pollution Control Board/Pollution Control Committee (SPCB/PCC). Subsequently, this answering Respondent i.e., CPCB sought clarification vide letter dated 25.08.2025 from Uttar Pradesh Pollution Control Board (UPPCB), regarding the location of the project site and the Compliance Status with respect to the

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Hazardous and Other Wastes (Management and Transboundary Movement) Amendment Rules, 2022, as well as the CPCB's Standard Operating Procedure (SOP) for recycling waste tyre scrap for the recovery of tyre pyrolysis oil, pyro gas, and char by Respondent No. 8. Copy of the said CPCB letter dated 25.08.2025 is given at **Annexure II**. The UPPCB submitted an Inspection Report, wherein the inspection was conducted on 23.08.2025. The location of the project site was verified by the UPPCB, and the following observations were made:

a) The unit was found under construction by the name of M/s Adidev Carbon LLP on Khasra No.-459 etc., Village-Sakauti, Tehsil-Unn, District- Shamli.

b) The conditional CTE has been issued by the Uttar Pradesh Pollution Control Board to the unit vide letter no. -221456/UPPCB/Circle-3 (UPPCBHO)/CTE/Shamli/2024 dated 21.10.2024 for establishment in October 2024.

c) The proposed unit is a continuous TPO plant having capacity of production 72 MT/Day of Recovery Carbon Black, 88 MT/day of Oil and 30 MT/day of Steel using 230 MT/day of waste tyres as raw material.

d) The unit has proposed to use 3.0 KLD water for domestic purpose and 6.0 KLD for cooling and

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scrubbing. The generated domestic effluent would be disposed of through septic tank and the water generated by cooling and scrubbing will be recycled through Effluent Treatment Plant. The unit has proposed Effluent Treatment Plant with a capacity of 6.0 KLD. The treatment units of the ETP are Screen Chamber, Equalization Tank, Flash Tank, Tube Settler, Agitator, Multigrade Filter, Activated Carbon Filter and Sludge Drying Beds etc.

e) The unit has proposed to set up 08 reactors of capacity 10 MT based on continuous operation. Wet Scrubber unit and 30-meter-high Chimney have been proposed as an Air Pollution Control System for the treatment of emission source.

f) The unit has proposed to establish a DG Set of capacity 125 KVA (CPCB-4 Plus) with the establishment of acoustic enclosure and chimney.

g) During the inspection, coordinates of the construction area of the proposed unit have been measured. According to the measurement the latitude and longitude of the site are located at 29.616920, 77.144070. The distance measurement has been carried out from pyrolysis unit of the project. The distances from nearby population/school/religious places/hospital /educational institutes are as follows:

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S. No.	Population/Religious Direction Distance Place/Educational Institute/Surface Water Body/Other	Direction	Distance
1	Population of Vill. Balrampur	West-South	Approx. 525 m.
2	Population of Vill. Kamalpur	West-South	Approx. 625 m.
3	Population ofVill. Sakauti	North	Approx. 713 m.
4	Maa Shakumbri Devi Temple	West	Approx. 510 m.
5	Rajkiya Yamuna Khadar Inter College, Kamalpur	West	Approx. 648 m.
6	G.R.D. Public School	North-East	Approx. 1500 m.
7	River Khokhri	West-South	Approx. 284 m.
8	Bidauli-Gangoh Road	North	Approx. 309 m.
9	Meerut-Karnal Highway	West-South	Annrox 3500 m

a) Bidoli-Gangoh Road is situated in the north direction at a distance of about 20 meters from the boundary wall of the proposed industry.

b) Sakauti Local Irrigation Drain is located behind the proposed industry.

c) At the time of inspection, no evidence of cutting of trees was observed at the proposed project site.

d) The industry is proposed to be set up in village Sakauti, Pargana-Bidauli, Tehsil-Un, District-Shamli, Khasra No. 464, 459, 454M, 454, 457 and 455 of Khata No.-56, total area 9.059 hectares (90590 sqm).

e) During inspection, the construction work of 03 sheds (Shed No.-1 Shredding Unit, Shed No.-2 Pyrolysis Unit, Shed No.-3 Recover Carbon Black Unit) was found to be in progress, in which 04 reactors have been installed in shed number-02 (Pyrolysis Unit) and work of installation

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of 01 reactor was found to be in progress. About 1100 plants have been found planted near the boundary wall of the proposed industry. Industry representative Mr. Shubham Singh, has informed that about 15000 plants have to be planted. The industry representative presented a photocopy of the map/layout plan approved by Deputy Director Factory, UP, Meerut.

f) The proposed industry has been set up according to the Standard Operating Procedure (SOP) of CPCB issued on dated 16.01.2024 for Recycling of Waste Tyre Scrap for the recovery of Tyre Pyrolysis Oil, Pyro Gas and Char in Tyre Pyrolysis Oil (TPO) issued by Central Pollution Control Board. The unit is based on Continuous TPO having total area of 90590 sqm and plant area is 16164 sqm.

g) The industry falls under orange category as per the notification of CPCB dated 29.01.2025 "Classification of Sectors into Red, Orange, Green, Whote and Blue Categories". According to the guidelines, the nearest boundary of surface water body/Flood Plain/HFL/Red Line) will be beyond 30 meter having industry without effluent generation and 75 meters with effluent generation. The settlement, educational institute, worship place, archaeological monuments, national parks, reserve forest, heritage site will be beyond 200 meters. The natural or storm drain passing through the location of

industrial plant shall not be disturbed. Copy of the said inspection report is given at **Annexure III.**

9. That under the averment made in para 6 of the OA, the Applicant has taken note of CPCB's revised SOP dated 10.01.2024 w.r.t. "Recycling of Waste Tyre Scrap for the recovery of Tyre Pyrolysis Oil (TPO), Pyro Gas and Char". In the said context, it is humbly submitted that this answering respondent has revised the SOP with focus on up gradation of environmental performance of the Tyre Pyrolysis units across the country. Further CPCB, vide email dated 19.01.2024 and letter dated 20.03.2024 circulated these revised SOPs to all SPCBs/PCCs for immediate implementation (Copy of email dated 19.01.2024 is given at **Annexure IV** & copy of letter dated 20.03.2024 is given at **Annexure V**).

10. That averments made under paragraphs 8 and 9, the applicant refers to the grant of Consent to Establish to Respondent No. 8 and the inspection conducted by the UPPCB on 25.12.2024. In this regard, it is humbly submitted that since the Consent to Establish has been granted by Uttar Pradesh Pollution Control Board, the response filed by Respondent No. 1 may be important for adjudication of this matter.

11. That the averment made in paragraph 10, wherein the applicant seeks documents related to Respondent No. 8 from the UPPCB, falls under the purview of the UPPCB. Hence, no comments are offered by this answering respondent.

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12. That the averment made in paragraph 11, wherein the applicant mentions the grant of Consent to Establish, including details of production capacity, by-products, location in a non-industrial zone, water consumption, and proximity to sensitive areas for Respondent No. 8, pertains to the CTE issued by the UPPCB. Therefore, it is respectfully prayed that the Hon'ble Tribunal may consider the response filed by Respondent No. 1 for adjudication of this matter. Hence, no comments are offered by this answering respondent.

13. That the averment made in paragraph 12, wherein the applicant alleges illegal felling of a significant number of trees by Respondent No. 8 without prior approval from the concerned department, falls under the purview of the UPPCB and other relevant authorities. Hence, no comments are offered by this answering respondent.

14. That the averment made in paragraph 13, wherein the applicant alleges illegal construction by the Tyre Pyrolysis Plant and requests the UPPCB to take action, falls under the purview of the UPPCB being the authority to grant the consent. Hence, no comments are offered by this answering respondent.

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REPLY TO GROUNDS:

15. That, the averments made in paragraphs 14 to 17 of the original application are related to ground clause, it is humbly

submitted that the submissions made in the above paragraphs are reiterated and-not repeated herein for sake of brevity.

16. That, the averments made in paragraph 18 are related to limitation clause. Hence, no comments are offered by this answering respondent.

17. That, no comments are offered by the answering respondent herein over the prayers made by the applicant in the OA and the same may be adjudicated by the Hon'ble Tribunal accordingly.

18. That, the answering respondent craves leave of the Hon'ble Tribunal to file additional reply, if required, in future.

19. That, in the light of the above submissions, it is respectfully submitted that this Answering Respondent, i.e., CPCB, shall abide by any order(s) or direction(s) passed by this Hon'ble Court in the instant OA.

(Youthika)
Scientist 'E'
Central Pollution Control Board
01.09.2025

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SUMESH KUMAR ARYA
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Regn. No. 46901
GOVT. OF INDIA

BEFORE THE HON'BLE NATIONAL GREEEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 266/2025

In the matter of:

Dr. Amit Kumar **Applicant**

Vs.

State of U.P. & Ors. **Respondent**

AFFIDAVIT

I, **Youthika** working as Scientist 'E' in Central Pollution Control Board, Parivesh Bhawan, East Arjun Nagar, Delhi, do hereby solemnly affirm and declare on oath and state as under:

1. That I, the deponent herein is well conversant with the facts and circumstances of the present case on the basis of the information derived from the official records, and hence, I am competent to verify, sign and swear this affidavit on behalf of the Respondent CPCB.

2. That the accompanying reply may be read part and parcel of the present affidavit as I am competent to swear this affidavit.

3. That the accompanying reply has been drafted and filed under my instructions and authority the contents thereof are true and correct on the basis of the record maintained during ordinary

NOTARY
SUMESH KUMAR ARYA
AREA : DELHI
Regn. No. 46901
GOVT. OF INDIA

course of business of CPCB and available records and documents and the contents of the same are read over and explained to me and are not repeated herein for the sake of brevity.

DEPONENT

यूथिका / Youthika
वैज्ञानिक 'ई' प्रभाग प्रमुख (ध्वनि.-III) / Scientist 'E' Divisional Head(WM-III)
केंद्रीय प्रदूषण नियंत्रण बोर्ड
Central Pollution Control Board
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय, भारत सरकार)
M/o Environment, Forest & Climate Change, Govt. of India)
परिवेश भवन, पूर्वी अर्जुन नगर, दिल्ली–110032
Parivesh Bhawan, East Arjun Nagar, Delhi-110032

VERIFICATION

01 SEP 2025

Verified at Delhi on this day of _____ 2025 that the contents of the above reply are correct and true on the basis of the records of the case as mentioned in the day-to-day affairs of the CPCB. Nothing has been concealed therefrom or mis- stated.

DEPONENT

यूथिका / Youthika
वैज्ञानिक 'ई' प्रभाग प्रमुख (ध्वनि.-III) / Scientist 'E' Divisional Head(WM-III)
केंद्रीय प्रदूषण नियंत्रण बोर्ड
Central Pollution Control Board
(पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय, भारत सरकार)
(M/o Environment, Forest & Climate Change, Govt. of India)
परिवेश भवन, पूर्वी अर्जुन नगर, दिल्ली–110032
Parivesh Bhawan, East Arjun Nagar, Delhi-110032

NOTARY
SUMESH KUMAR ARYA
AREA : DELHI
Regn. No. 46501
GOVT. OF INDIA

ATTESTED
NOTARY PUBLIC, DELHI
GOVT. OF INDIA

01 SEP 2025

Annexure- I

Item Ns. 05 Court No. 1

BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

Original Application No. 266/2025

Dr. Amit Kumar Applicant

Versus

State of Uttar Pradesh & Ors. Respondent(s)

Date of hearing: 28.05.2025

CORAM: HON'BLE MR. JUSTICE PRAKASH SHRIVASTAVA, CHAIRPERSON
HON'BLE DR. A. SENTHIL VEL, EXPERT MEMBER

Applicant: Dr. Amit Kumar, Applicant in Person (Through VC)

ORDER

1. In this Original Application (OA), applicant has raised a grievance against setting up of respondent no.8- M/s Adideva Carbon LLP which is stated to be a Tyre Pyrolysis Plant.

2. According to the applicant, said Tyre Pyrolysis Plant has been set up at Khasra Nos. 454, 455, 457, 459 and 464 of Village Sakauti, District Shamli, Uttar Pradesh.

3. Learned Counsel for the applicant submits that siting criteria as provided in the Standard Operating Procedure (SOP) for Recycling of Waste Tyre Scrap for the recovery of Tyre Pyrolysis Oil, Pyro Gas and Char in Tyre Pyrolysis Oil (TPO) Units issued by Central Pollution Control Board (CPCB) has been violated and in this regard, he has referred to the Clause 2.1 of the SOP which provides as under:

> *"2.1 Siting Criteria for ABAP type TPO Units*
>
> *The siting criteria is applicable only to new /proposed units. New ABAP type TPO unit shall be allowed only in the industrial areas/land.*

(1) Siting criteria for ABAP type TPO Units:
The criteria for siting of ABAP type TPO units depends on the following facts:

i) There are no organized continuous process emissions in process.

ii) The air pollutant emission in ABAP type TPO unit is from burning of fuel for heating purpose and intermittent flaring of excess pyro gas or its emergency release;

iii) The plot area of the TPO Unit carries more weightage as the emission from TPO unit does not affect far away community, instead it is the immediate neighbourhood that is affected. Char, being large size particle if spilled in the plant premises during its handling cannot travel to larger distance under the influence of wind;

iv) The environmental concern from TPO Unit is spillage of Char in the work zone while removing it from the reactor and its subsequent packing into the bags. The influence zone due to this spillage is limited within the premise of the unit;

v) The odour from TPO Unit are localized and confined to premises and adjacent areas.

Followings are the criteria for site consideration for new units:

i) New ABAP type TPO Unit having individual reactor capacity of 10 tonnes to 20 tonnes should only be allowed;

ii) Considering the possible impacts in neighbourhood, TPO Unit having cumulative maximum batch capacity up to 60 tonnes per day (TPD) only be allowed within a premises and this is applicable for new ABAP type Units / expansion in existing batch type TPO Unit.

iii) Beyond cumulative batch capacity of 60 TPD, only continuous process type TPO unit be allowed in case of setting up of new ABAP type units or expansion in existing TPO Unit in a single premises.

iv) For new ABAP type TPO Unit the minimum plot area shall be 3000 square meters for a single reactor of 10 to 12 tonnes capacity and the area will increase by 750 square meters for every additional reactor of capacity 10 to 12 tonnes and will increase up to 6000 square meters.

v) For new proposed ABAP type TPO unit the minimum plot area shall be 4000 square meters for a single batch reactor of 20 tonnes capacity and the area will increase by 1000 square meter for every additional reactor and will increase up to 6000 square meters.

vi) For new proposed continuous TPO unit the minimum plot area should be 7000 square meters irrespective of number of reactors."

(II) Green Belt Requirement

The green belt should be as per consent conditions or as per the guidelines of Central and State Government and in no case less than 5% of the total area of the plot.

(Ill) Movement of Fire-Tenders

Paved road to be provided for movement of the fire-tenders. No material is allowed to be stored (no obstruction) on this paved road. SPCBs /PCCs to ensure this requirement, while issuing new CTE/CTO."

4. Plea of the applicant is that respondent no.6 is constructing the Tyre Pyrolysis Plant with a capacity of 230 metric tonnes per day at a location that is very close to ecologically and socially sensitive areas including the Khokhari River (within 40 meters), near Irrigation Department drain (0 meter), Mata Ka Mandir (50 meters), a government inter-college (100 meters), and residential areas of two villages (within 300–400 meters). It is also the case of the applicant that site is directly adjacent to a Highway.

5. Learned Counsel for the applicant submits that Consent To Establish (CTE) application was made by respondent no.6 on 19.09.2024, therefore, guidelines which have been issued by CPCB on 16.01.2024 applies to the respondent no.6 unit and without considering the issue of siting criteria, Uttar Pradesh Pollution Control Board (UPPCB) has issued CTE dated 21.10.2024 annexure 6, page 129.

6. O.A. raises substantial issue relating to the compliance of environmental norms.

7. Issue notice to the respondents for filing their response/reply by way of affidavit before the Tribunal at least one week before the next date of

hearing through e-filing. If any respondent directly files the reply without routing it through his advocate then the said respondent will remain virtually present to assist the Tribunal.

8. Applicant is directed to serve the respondents and file affidavit of service at least one week before the next date of hearing.

9. List on 02.09.2025.

Prakash Shrivastava, CP

Dr. A. Senthil Vel, EM

May 28, 2025
Original Application No. 266/2025
JG.

Annexure- II

F.No: CM-13011/95/2025-LAW-HO-CPCB-HO 4498 **Dated 25 .08.2025**

To

The Member Secretary
Uttar Pradesh Pollution Control Board,
Building No. TC-12V, Vibhuti
Khand, Gomti Nagar,
Lucknow - 226010,
Uttar Pradesh

Subject: Clarification regarding grant of Consent to Establish (CTE) to M/s Adideva Carbon LLP, District Shamli, Uttar Pradesh – reg.

Sir/Madam,

This has reference of the NGT Matter OA No. 266/2025, where the applicant has raised grievance related to the illegal construction of a tyre pyrolysis plant operated by M/s Adideva Carbon LLP (230 MT/day capacity) at Khasra Nos. 454, 455, 457, 459, and 464 in Village Sakauti, District Shamli, Uttar Pradesh. The applicant has also mentioned that the said site is located in close proximity to water bodies (Khokhari River and an irrigation drain), a government inter college, a temple, and residential areas, and falls outside the designated industrial land which is non-compliance of by referring siting criteria as mentioned in the CPCB's Standard Operating Procedure(SOP) for Recycling of Waste Tyre Scrap for the recovery of Tyre Pyrolysis Oil, Pyro Gas and Char in Tyre Pyrolysis Oil (TPO) Units issued 16.01.2024

In view of above, it is requested to kindly provide the current status of compliance w.r.t to Hazardous and Other Wastes (Management and Transboundary Movement) Amendment Rules, 2022(Waste Tyre) as well as CPCB's Standard Operating Procedure(SOP) for Recycling of Waste Tyre Scrap for the recovery of Tyre Pyrolysis Oil, Pyro Gas and Char in Tyre Pyrolysis Oil (TPO) by M/s Adideva Carbon LLP.

The above information may kindly be provided at the earliest to this office through email at (youthika.cpcb@gov.in & wastetyre.cpcb@gov.in

This matter may be treated as urgent & important.

(Youthika)
Divisional Head,
WM-III Division

i. The Regional Director,
The Regional Directorate, Lucknow, Central Pollution Control Board, Ground Floor, PICUP Bhawan, Vibhuti Khand, Gomti Nagar,Lucknow – 226010, Uttar Pradesh

: Kindly coordinate in your jurisdiction for timely submission of the information.

(Youthika)

-O/c-

Annexure-III

Inspection report of M/s Adidev Carbon LLP, Khasra No. 459 etc., Vill. Sakauti, Tehsil Un, District Shamli

Complaint has been filed by Sh. Amit Kumar before Hon'ble National Green Tribunal against the establishment of M/s Adidev Carbon LLP, Khasra No. 459, Vill. Sakauti, Tehsil Unn, District Shamli alleging that the unit fails to comply with the siting criteria and SOP guidelines of CPCB regarding TPO plant. Hon'ble Tribunal has passed the following order dated 28.05.2025 under the said Original Application.

"..... 6. O.A. raises substantial issue relating to the compliance of environmental norms.

7. Issue notice to the respondents for filing their response/reply by way of affidavit before the Tribunal at least one week before the next date of hearing through e-filing. If any respondent directly files the reply without routing it through his advocate, then the said respondent will remain virtually present to assist the Tribunal.

8. Applicant is directed to serve the respondents and file affidavit of service at least one week before the next date of hearing.

9. List on 02.09.2025. "

In compliance with the above orders, the undersigned inspected the industry on 23.08.2025. During the inspection, Mr. Shubham Singh, HOD, Adidev Carbon LLP was present as a representative of the industry.

Inspection was carried out at the unit, and the facts found are as follows :

1- The unit was found under construction by the name of M/s Adidev Carbon LLP on Khasra No.-459 etc., Village-Sakauti, Tehsil-Unn, District- Shamli.

2- The conditional CTE has been issued by the State Board to the unit vide

JRF JE (AEE)

letter no.-221456/UPPCB/Circle-3 (UPPCBHO)/CTE/Shamli/2024 dated 21.10.2024 for establishment in October 2024 **(Annexure-2).**

3- The proposed unit is a continuous TPO plant having capacity of production 72 MT/Day of Recovery Carbon Black, 88 MT/day of Oil and 30 MT/day of Steel using 230 MT/day of tyres as raw material.

4- The unit has proposed to use 3.0 KLD water for domestic purpose and 6.0 KLD for cooling and scrubbing. The generated domestic effluent would be disposed of through septic tank and the water generated by cooling and scrubbing will be recycled through Effluent Treatment Plant. The unit has proposed Effluent Treatment Plant with a capacity of 6.0 KLD. The treatment units of the ETP are Screen Chamber, Equalization Tank, Flash Tank, Tube Settler, Agitator, Multigrade Filter, Activated Carbon Filter and Sludge Drying Beds etc.

5- The unit has proposed to set up 08 reactors of capacity 10 MT based on continuous operation. Wet Scrubber unit and 30-meter-high Chimney have been proposed as an Air Pollution Control System for the treatment of emission source.

6- The unit has proposed to establish a DG Set of capacity 125 KVA (CPCB-4 Plus) with the establishment of acoustic enclosure and chimney as APCD.

7- During the inspection, coordinates of the construction area of the proposed unit have been measured. According to the measurement the latitude and longitude of the site are located at 29.616920, 77.144070. The distance measurement has been carried out from pyrolysis unit of the project. The distances from nearby population/school/religious places/hospital /educational institutes are as follows :

SRF ROP 10 SE (AEE)

S. No.	Population/Religious Place/Educational Institute/Surface Water body/Other	Direction	Distance
1.	Population of Vill. Balrampur	West-South	Approx. 525 m.
2.	Population of Vill. Kamalpur	West-South	Approx. 625 m.
3.	Population of Vill. Sakauti	North	Approx. 713 m.
4.	Maa Shakumbri Devi Temple	West	Approx. 510 m.
5.	Rajkiya Yamuna Khadar Inter College, Kamalpur	West	Approx. 648 m.
6.	G.R.D. Public School	North-East	Approx. 1500 m.
7.	River Khokhri	West-South	Approx. 284 m.
8.	Bidauli-Gangoh Road	North	Approx. 309 m.
9.	Meerut-Karnal Highway	West-South	Approx. 3500 m.

a) Bidoli-Gangoh Road is situated in the north direction at a distance of about 20 meters from the boundary wall of the proposed industry.

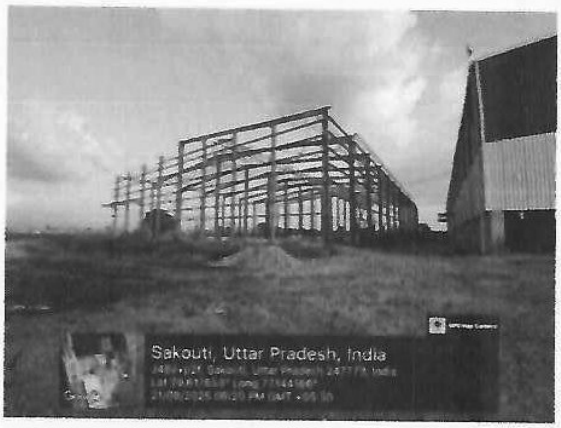
b) Sakauti Local Irrigation Drain is located behind the proposed industry.

c) At the time of inspection, no evidence of cutting of trees was observed at the proposed project site.

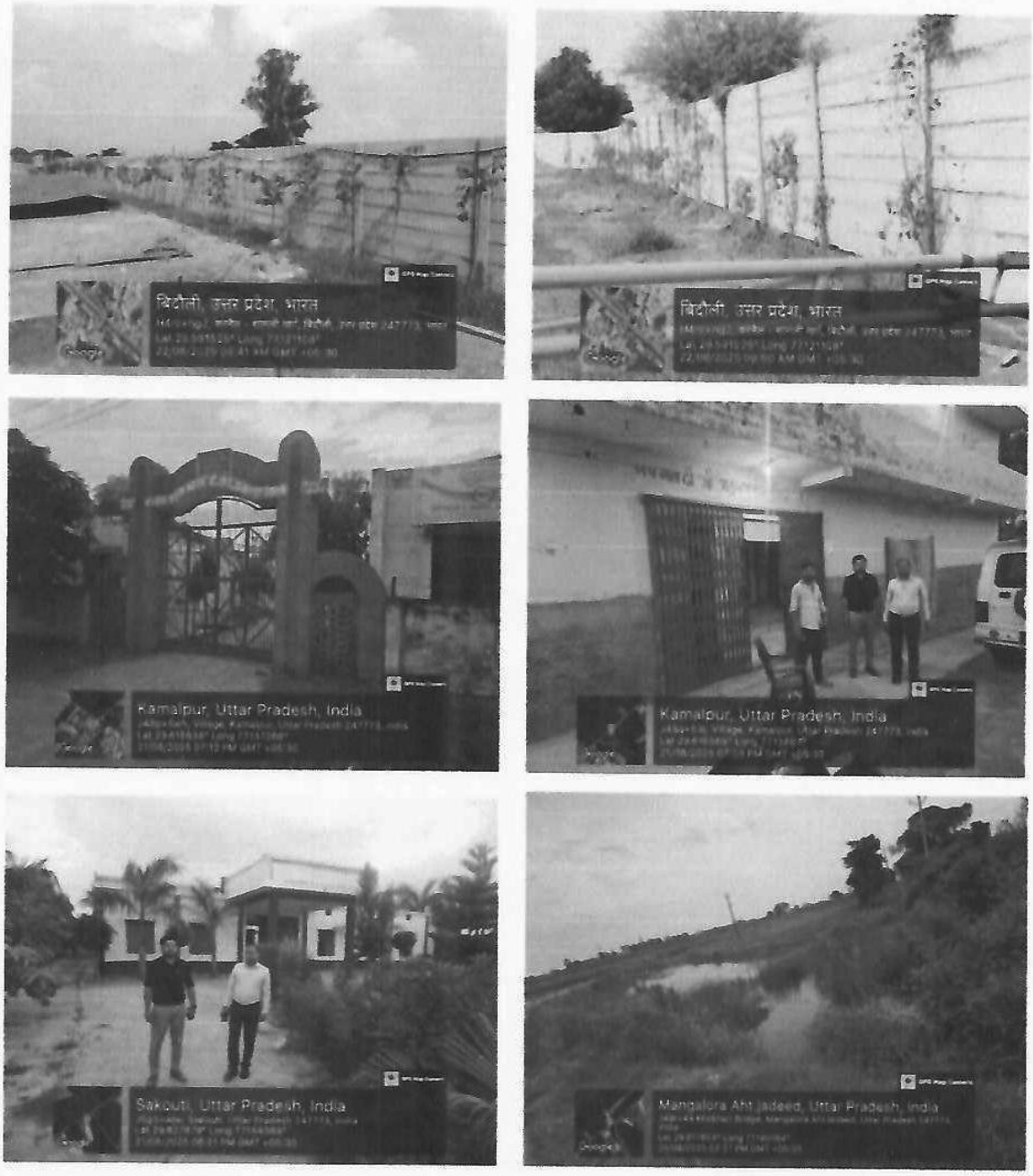
8- The industry is proposed to be set up in village Sakauti, Pargana-Bidauli, Tehsil-Un, District-Shamli, Khasra No. 464, 459, 454M, 454, 457 and 455 of Khata No.-56, total area 9.059 hectares (90590 sqm).

9- During inspection, the construction work of 03 sheds (Shed No.-1 Shredding Unit, Shed No.-2 Pyrolysis Unit, Shed No.-3 Recover Carbon Black Unit) was found to be in progress, in which 04 reactors have been installed in shed number-02 (Pyrolysis Unit) and work of installation of 01 reactor was found to be in progress. About 1100 plants have been found planted near the boundary wall of the proposed industry. Industry

representative Mr. Shubham Singh, has informed that about 15000 plants have to be planted. The industry representative presented a photocopy of the map/layout plan approved by Deputy Director Factory, UP, Meerut. The photographs taken during inspection are as follows-



JRF RO&HO SE (AEE)



10- The proposed industry has been set up according to the Standard Operating Procedure (SOP) of CPCB issued on dated 16.01.2024 for Recycling of Waste Tyre Scrap for the recovery of Tyre Pyrolysis Oil, Pyro Gas and Char in Tyre Pyrolysis Oil (TPO) issued by Central Pollution Control Board. The unit is based on Continuous TPO having total area of 90590 sqm and plant area is 16164 sqm.

JTRF JE (AEE)

11- The industry falls under orange category as per the notification of CPCB dated 29.01.2025 whereby guidelines namely control of Air Pollution (Grant/Refusal or Cancellation of Consent) guidelines 2025 were notified. According to the guidelines, the nearest boundary of surface water body/Flood Plain/HFL/Red Line) will be beyond 30 meter having industry without effluent generation and 75 meters with effluent generation. The settlement, educational institute, worship place, archeological monuments, national parks, reserve forest, heritage site will be beyond 200 meters. The natural or storm drain passing through the location of industrial plant shall not be disturbed.

Conclusion -

With reference to the above findings and facts, the proposed unit is being established as per the standard operating procedure issued by Central Pollution Control Board and the guidelines issued by the notification of CPCB dated 29.01.2025.

The report is respectfully submitted for your kind consideration and necessary action please.

(Diwakar Dev Gahlaut)	(Raja Gupta)	(Kunwar Santosh Kumar)
J.R.F.	J.E.	A.E.E.

Regional Officer

Fwd: Implementation of Revised Standard Operating Procedure (SOP) for Recycling of Waste Tyre Scrap for the Recovery of Tyre Pyrolysis Oil, Pyro Gas, Steel and Char in Tyre Pyrolysis Oil (TPO) Units

Annexure- IV

Me Anand Kumar <wm3.cpcb@gov.in>
Fri, 19 Jan 2024 4:46:56 PM +0530 •

To "TARUN DARBARI" <tarundarbari.cpcb@gov.in>

Cc "Anshul Singh" <anshuls.cpcb@gov.in>

Sir,
Please find the trailing mail for your reference.

From: "Anand Kumar" <wm3.cpcb@gov.in>
To: chairman@uppcb.com, msukpcb@gmail.com, mscellbspcb@gmail.com, ranchijspcb@gmail.com, chairman@ospcboard.org, chairman@wbpcb.gov.in, dstandamans@gmail.com, chairman-gpcb@gujarat.gov.in, gpcbchairman@gmail.com, "Secretary Health DNH and DD" <secy-health@daman.nic.in>, "Chairman GSPCB" <chairman-gspcb.goa@nic.in>, "Chairman Karnataka State Pollution Control Board" <chairman@kspcb.gov.in>, "CHAIRMAN KSPCB" <chn.kspcb@gov.in>, "kps iitm" <kps.iitm@gmail.com>, "Director, S&T" <lk-dst@nic.in>, "chairman chairmanoffice" <chairman-mppcb@mp.gov.in>, "Chairperson" <chairperson@rpcb.nic.in>, hocecb@gmail.com, chairman@pcbassam.org, arunachalspcb@gmail.com, "tchandy abc" <tchandy.abc@gmail.com>, spcbsikkim@gmail.com, radhakishore888@gmail.com, cpmarak@yahoo.com, "MPCB" <mpcb@mizoram.gov.in>, rusoviljohn@yahoo.co.in, bagarwala00@gmail.com, tnpcbchairman@gmail.com, chairman@pcb.ap.gov.in, "pa chairman" <pa_chairman@pcb.ap.gov.in>, "Rajiv Sharma" <chief.advisor@telangana.gov.in>, "Mr A Nedunchezhiyan IAS" <secyfy.pon@nic.in>, "Pondicherry Pollution Control Committee Pondicherry" <ppcc.pon@nic.in>, "CHAIRMAN DPCC" <chdpcc@nic.in>, "Chandigarh Pollution Control Committee" <cpcc-chd@nic.in>, chairman87jkspcb@gmail.com, "Prabodh Saxena" <envsecy-hp@nic.in>, "Chairman PPCB" <chairman.ptl.ppcb@punjab.gov.in>, hspcbho@gmail.com, chairman@mpcb.gov.in, ms@uppcb.com, msukpcb@yahoo.com, wbpcbnet@wbpcb.gov.in, ms@wbpcb.gov.in, membersecretary@ospcboard.org, membersecretarygpcb@gmail.com, ms-gpcb@gujarat.gov.in, "Pollution Control Committee" <pcc-dnhdd@ddd.gov.in>, pccdddnh@gmail.com, "Member Secretary Karnataka State Pollution Control Board" <memsecy@kspcb.gov.in>, "Sheela A.M" <ms.kspcb@gov.in>, "Member Secretary GSPCB" <ms-gspcb.goa@nic.in>, "ms msoffice" <ms-mppcb@mp.gov.in>, "Member Secretary" <member-secretary@rpcb.nic.in>, "Dr. Buddhaprakash Jyothi" <ms-tspcb@telangana.gov.in>, "Member Secretary APPCB" <membersecy@appcb.gov.in>, "PA to Member Secretary, APPCB" <pa-ms@appcb.gov.in>, "MS TNPCB" <memsec@tnpcb.gov.in>, membersecretary@pcbassam.org, "Pollution Control Board" <pcb-man@nic.in>, "Member Secretary of Meghalaya State Pollution Control Board" <memsecy.spcb-meg@gov.in>, mizorampcb@gmail.com, npcb2@yahoo.com, drgopalpradhan@gmail.com, bishuk5@gmail.com, hspcbms@gmail.com, "mspcb-hp" <mspcb-hp@nic.in>, membersecretaryjkspcb@gmail.com, membersecretarylpcc@gmail.com, "Member Secretary PPCB" <msppcb@punjab.gov.in>, "Dr. K.S Jayachandran" <msdpcc@nic.in>, ms@mpcb.gov.in
Cc: "Anand Kumar" <anand.cpcb@nic.in>
Sent: Tuesday, January 16, 2024 8:00:47 PM
Subject: Implementation of Revised Standard Operating Procedure (SOP) for Recycling of Waste Tyre Scrap for the Recovery of Tyre Pyrolysis Oil, Pyro Gas, Steel and Char in Tyre Pyrolysis Oil (TPO) Units

Sir/Madam,

Please find attached the revised Standard Operating Procedure (SOP) for Tyre Pyrolysis Oil (TPO) units. The revised SOP has been approved by the Chairman, CPCB.

Central Pollution Control Board has revised the existing Standard Operating Procedure (SOP) for Tyre Pyrolysis Oil (TPO) units after conducting an extensive study of seven (07) TPO units comprising of three (03) existing batch TPO units and one (01) continuous tyre pyrolysis unit under the guidance of expert committee comprising of experts from NEERI and IIT Delhi. The findings of the study carried out by SPCBs in seventy (70) TPO units were also incorporated into the SOP.

You are requested to implement the revised SOP for TPO units.

Thanks & Regards,

392

Anand Kumar
Director & Div. Head
WM -III Division,
Central Pollution Control Board
e-mail Id - wm3.cpcb@gov.in

1 Attachment(s) • Download as Zip

SOP for Tyre Pyrolysis Oil Unit (R… .pdf
10.2 MB •

Annexure-V

File No. CP-22/139/2021-WM-III-HO-CPCB-HO-Part (2) March 20, 2024

11043-11087

To,

The Member Secretary
(All SPCBs/PCCs)

Subject: Standard Operating Procedures (SOPs) for "Recycling of waste tyre scrap for the recovery of tyre pyrolysis oil, pyro gas, and char in tyre pyrolysis oil (TPO) units"- Regarding implementation of SOP

Sir,

In the matter of OA No. 400 of 2019 before the Hon'ble NGT, PB - New Delhi, regarding management of waste tyres, the Hon'ble NGT, vide its order date 07/11/2022, directed CPCB for revision of the existing SOP for the tyre pyrolysis oil unit. In compliance, CPCB has revised SOP for 'Recycling of waste tyre scrap for the recovery of tyre pyrolysis oil, pyro gas and char in tyre, pyrolysis oil (TPO) units'. The SOP was circulated to all SPCBs/PCCs vide email dated 19.01.2024 for its implementation and a copy is also enclosed for ready reference.

In view of the observations of Hon'ble NGT (PB) in it's order dated 19-01-2024 followings are required to be carried out by SPCBs/PCCs-

1. Implementation of revised SOP of TPO;
2. Ensuring Zero Liquid Discharge (ZLD) and general gaseous emission standards while issuing Consent to Establish & Operate under the Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention & Control of Pollution) Act, 1981.

Encl.: As above

Yours faithfully,
Anand Kumar 20/03/2024
(Anand Kumar)
Director & D.H.
WM-III Division

Copy to:

i. All Regional Directorates, CPCB : For Information and n/a, please

Anand Kumar 20/03/2024
(Anand Kumar)

केन्द्रीय प्रदूषण नियंत्रण बोर्ड
निर्गत.....
दिनांक.....21.03.24.....

S/C

Standard Operating Procedure(SOP) for Recycling of Waste Tyre Scrap for the recovery of Tyre Pyrolysis Oil, Pyro Gas and Char in Tyre Pyrolysis Oil (TPO) Units

January 16, 2024

Central Pollution Control Board

(Ministry of Environment, Forest & Climate Change, Government of India)

Parivesh Bhawan, East Arjun Nagar, Shahdara, Delhi – 110032

CP-22/139/2021-WM-III-HO-CPCB-HO

STANDARD OPERATING PROCEDURE
for
Recycling of Waste Tyre Scrap for the recovery of Tyre Pyrolysis Oil, Pyro Gas and Char in Tyre Pyrolysis Oil (TPO) Units

1.0 Background

In the matter of OA No. 400 of 2019 and in compliance of the Hon'ble NGT order dated 06-01-2020, seven (07) Tyre Pyrolysis Oil (TPO) Units comprising of three (03) advance batch automated tyre pyrolysis plants, three (03) existing batch units and one (01) continuous tyre pyrolysis plants were studied under the guidance of experts from NEERI and IIT Delhi. Further study of 70 TPO units were carried out with the help of SPCBs. As per the study advanced batch automated process (ABAP) and continuous tyre pyrolysis process had demonstrated compliance with regard to work zone limits and no significant impact on ambient air quality.

The study further observed that existing batch TPO Units need additional features such as PLC based control arrangement, bypass arrangement for pyro gas from reactor door to primary condenser, installation of gas sensors, pressure, temperature gauges at reactor & storage tank, gas /fire alarm system, flaring of entire pyro gas during emergency, arrangement for re-circulation of pyro gas for reactor's heating, provision for flaring of pyro gas, suction hoods over the gate of reactor and char bagging area, water sprinkler system and mechanized arrangement for removal of char and steel scrap and arrangement of Nitrogen gas (N_2) purging to address environmental and safety concerns.

In the same matter, the Hon'ble NGT vide its order dated 25.10.2021 directed to issue appropriate SoP covering siting criteria, threshold limit of a plant, carrying capacity, standards for effluents, emissions and hazardous or other waste, safety aspects to prevent accidents and for protection of public health. Accordingly, in consultation with expert members from NEERI & IIT-Delhi, the existing SoP was revised w.r.t Recycling of Waste Tyre Scrap for the recovery of Tyre Pyrolysis Oil, Pyro Gas and Char in Tyre Pyrolysis Oil (TPO) Unit.

1.1 Pyrolysis process

Pyrolysis is a thermal degradation process carried out in the absence of oxygen /air in a vessel or a chamber, so that the combustion of material does not take place. It is a process in which organic materials are thermally decomposed into simpler compounds in the temperature range of 400 – 500 °C in an oxygen-free environment. **Fig. 1** shows the

schematic diagram of waste scrap tyre pyrolysis process. Since the products of thermal decomposition are released at different temperature having varying molecular structure, the products are in all phases i.e. solid, liquid and gas. Pyrolysis of tyres and rubber products produce pyrolysis oils, pyrolysis gas (pyro-gas), char and steel. The products generated in tyre pyrolysis are as follows:

A) **Pyro Gas**: 20 to 35 percent of a tyre's energy content is typically converted into a combustible gas (Pyro Gas) that is used to fuel the pyrolysis process or is combusted in a flare before it is released. Typically, the components of pyro gas are H_2, H_2S, CO, CO_2, CH_4, C_2H_4, C_3H_6 and other light hydrocarbons.
B) **Pyro Oil**: 35 to 50 percent of the output from the process is transformed into a liquid product that varies in quality from saleable fuel oil to lower-value oil blend stock.
C) **Char**: The residual solid product (referred as char constitutes 25 to 40 percent of the output and contains a mixture of carbon, silica, titanium dioxide, zinc, steel etc.
D) **Steel**: The thin wire, which is used for reinforcement of tyre is extracted out during pyrolysis and is collected at the end, sold in the market as scrap steel.

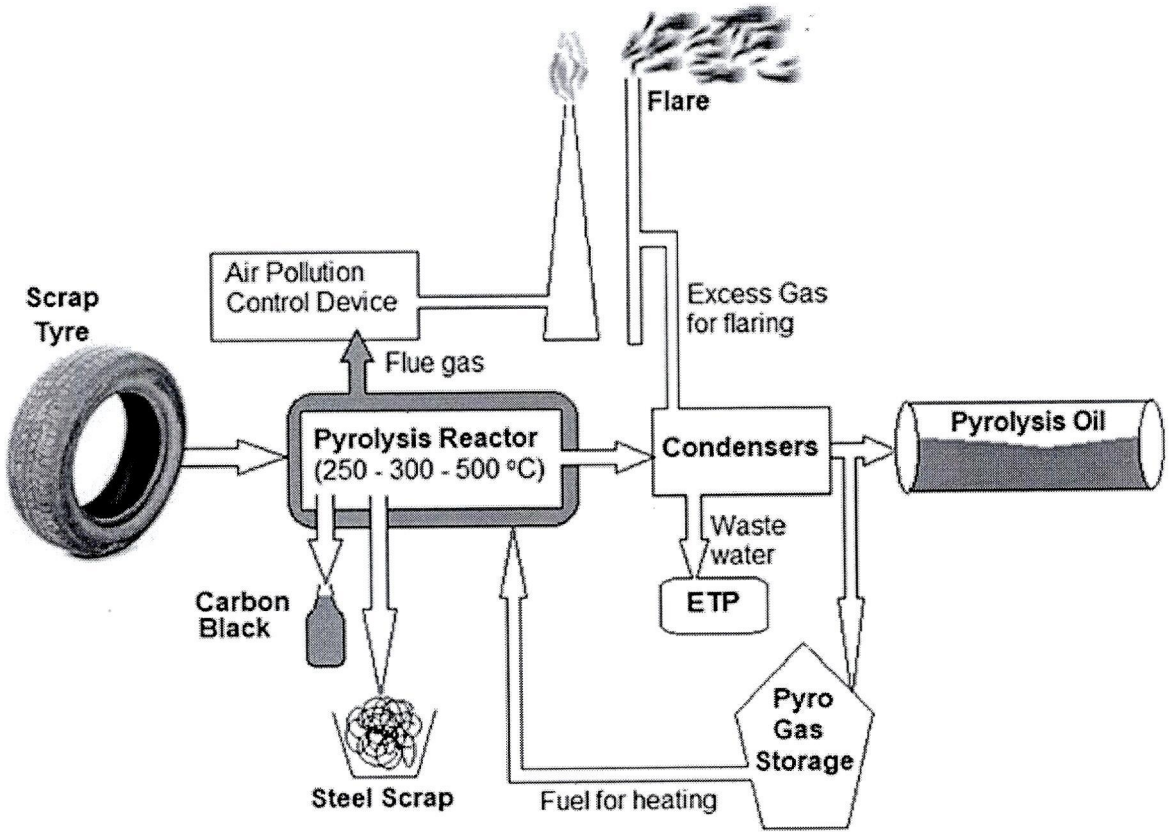


Fig. 1: Schematic diagram of waste tyre pyrolysis process

The quantity and quality of each product depends on many process variables, including temperature, pressure, and residence time. A preferred quality trye pyrolysis oil would have molecular weight little above its boiling temperature under normal temperature and pressure. This would help in efficient combustion, and less of soot formation. Waste tyre pyrolysis plant operators are expected to have a control on rate of heating and condensation so as to produce high-quality oils with high calorific values comparable with diesel and gasoline type fuels.

Two types of Pyrolysis process are in operation in India. Batch Type and Continuous Pyrolysis process. In both type of pyrolysis processes, the final product remains the same. Most of the tyre pyrolysis units in the country are based on batch processes technology having different types of process control, safety mechanism, raw material, finish product and waste handling facilities. There is a need to standardize the operations and facilities at Tyre Pyrolysis Oil (TPO) Units to achieve environmentally sound and safe operation of these units.

From the study carried out, it was observed that Advanced Batch Automated Process (ABAP) and continuous tyre pyrolysis process had no significant impact on ambient air quality. Therefore, for standardizing the batch type pyrolysis operations, Advanced Batch Automated Process (ABAP) type TPO Unit shall only be allowed.

2.0 Siting Criteria, Carrying Capacity and Standard Operating Procedures (SoP) for Advanced Batch Automated Process (ABAP) type TPO units:

2.1 Siting Criteria for ABAP type TPO Units

The siting criteria is applicable only to new /proposed units. New ABAP type TPO unit shall be allowed only in the industrial areas/land.

(I) **Siting criteria for ABAP type TPO Units:**

The criteria for siting of ABAP type TPO units depends on the following facts:

i) There are no organized continuous process emissions in tyre pyrolysis process.
ii) The air pollutant emission in ABAP type TPO unit is from burning of fuel for heating purpose and intermittent flaring of excess pyro gas or its emergency release;
iii) The plot area of the TPO Unit carries more weightage as the emission from TPO unit does not affect far away community, instead it is the immediate neighbourhood that is affected. Char, being large size particle if spilled in the plant premises during its handling cannot travel to larger distance under the influence of wind;
iv) The environmental concern from TPO Unit is spillage of Char in the work zone while removing it from the reactor and its subsequent packing into the

bags. The influence zone due to this spillage is limited within the premise of the unit;

v) The odour from TPO Unit are localized and confined to premises and adjacent areas.

Followings are the criteria for site consideration for new units:

i) New ABAP type TPO Unit having individual reactor capacity of 10 tonnes to 20 tonnes should only be allowed;

ii) Considering the possible impacts in neighbourhood, TPO Unit having cumulative maximum batch capacity up to 60 tonnes per day (TPD) only be allowed within a premises and this is applicable for new ABAP type Units /expansion in existing batch type TPO Unit.

iii) Beyond cumulative batch capacity of 60 TPD, only continuous process type TPO unit be allowed in case of setting up of new ABAP type units or expansion in existing TPO Unit in a single premises.

iv) For new ABAP type TPO Unit the minimum plot area shall be 3000 square meters for a single reactor of 10 to 12 tonnes capacity and the area will increase by 750 square meters for every additional reactor of capacity 10 to 12 tonnes and will increase up to 6000 square meters.

v) For new proposed ABAP type TPO unit the minimum plot area shall be 4000 square meters for a single batch reactor of 20 tonnes capacity and the area will increase by 1000 square meter for every additional reactor and will increase up to 6000 square meters.

vi) For new proposed continuous TPO unit the minimum plot area should be 7000 square meters irrespective of number of reactors.

(II) Green Belt Requirement

The green belt should be as per consent conditions or as per the guidelines of Central and State Government and in no case less than 5% of the total area of the plot.

(III) Movement of Fire-Tenders

Paved road to be provided for movement of the fire-tenders. No material is allowed to be stored (no obstruction) on this paved road. SPCBs /PCCs to ensure this requirement, while issuing new CTE/CTO.

2.2 Carrying Capacity of the area for siting of ABAP type Tyre Pyrolysis Oil (TPO) Units

The committee constituted by the Hon'ble NGT in the is of the view that carrying capacity may not be required in case of individual Tyre Pyrolysis Units of capacity 10 - 60 TPD, since these are small pyrolytic operations with no process emissions and there are only flue gas emissions due to combustion of fuels for reactors or in flare stacks.

In order to minimize impact on adjacent areas, the minimum plot area as stipulated in section 2.1 is required by the unit.

2.3 Threshold Limits for Tyre Pyrolysis Oil (TPO) Units (New TPO Units and expansions in Existing TPO units)

The threshold limit is applicable to new /proposed units or expansion in the existing units. Followings are the threshold limits for the TPO units:

i) New ABAP type TPO units or expansion in existing units having cumulative batch capacity up to 60 TPD only shall be allowed.
ii) Beyond cumulative batch capacity of 60 TPD for new units or expansion in existing units, only continuous type TPO unit shall be allowed.

2.4 Standard Operating Procedure (SoP) of ABAP type TPO Units

A) Minimum Requirement for Environmentally Sound Operation:

2.4.1	Unit should have a valid Consent to Establish (CTE), Consent to Operate (CTO) under Water and Air Act and Authorization under the Hazardous and Other Waste (M & TM) Rules, 2016 issued by SPCB / PCC & Fire Safety Certificate issued by the concerned department.
2.4.2	Unit to comply with emission & effluents standards as prescribed by the concerned SPCBs/ PCCs in consent to operate (CTO) under Air and Water Act. Further the management of Hazardous waste generated has to be done as per the conditions prescribed in the authorization issued by the SPCBs / PCCs under the Hazardous and Other Waste (M & TM) Rules, 2016.
2.4.3	The feed to ABAP type reactor has to be in the form of used tyre scrap – whole tyres /cut tyres / chips / shred /mulch /granules etc.
2.4.4	Initial heating of the reactor has to be done either by using pyro gas stored during previous cycle or by use of pyro water / purge water (oil mix water) / oil water emulsion, or by tyre pyrolysis oil or any other fuel approved by concerned SPCBs /PCCs. After generation of pyro gas, the same is to be used for the purpose of heating reactor. The flue gas should be vented out to the environment through an alkaline scrubber with mist eliminator attached to a chimney of at least 30 meters height. Plants to install adequate air pollution control devices (APCDs) for controlling flue gas emissions.

2.4.5	A compressor / air blower has to be installed for mixing of air with pyro water for ensuring proper burning while using pyro water/purge water during initial heating.
2.4.6	In order to control fugitive emissions from the reactor shell during operation, its proper sealing should be ensured.
2.4.7	ABAP type TPO units to construct or install a sufficient capacity suction hood / industrial dust collector attached to a bag filter at feeding door and same should must be operational at the time of removal of steel scrap wire and char from the reactor.
2.4.8	Suction hoods also to be installed at all the transfer points across the work zone such as at char bagging area etc. to control fugitive emissions. All suction hood to be connected to a common manifold leading to alkaline scrubber with mist eliminator attached with stack of 30 m height (installed for venting out flue gas emissions).
2.4.9	Unit to ensure no spillage of char during removal/ unloading of steel scrap from the reactor. The flooring should be paved/ concretized along with proper slope and drains for movement of steel scrap. This operation to be made cleaner by use of vacuum cleaner after each batch operation.
2.4.10	Unit to install water sprinkling system for prevention of fugitive emission at the all transfer points for arresting fugitives.
2.4.11	The removal of char should be through a mechanized system. The unloading of char from the reactor is to be done under controlled conditions in such a manner that the material inside the reactor is not open to the atmosphere at any point of time. The char shall be bagged in the HDPE bags with proper sealing. It should be ensured that no spillage take place during the collection of the char in the bags. The removal of char should be started only after Nitrogen purging.
2.4.12	A permanent arrangement should be made for Nitrogen purging. Pre-filled nitrogen gas cylinders will not be allowed to use for purging. All units to have PLC based Nitrogen generator as per the following requirement:

Number of Reactors	Nitrogen Generator capacity (Nm^3/h)	Storage Tank Capacity (Liters)
1	3	1000
2	5	1500
3	7	2000
4	10	3000
> 4	12	4000

2.4.13	Excess pyro gas if any should be flared through properly designed flaring system of adequate capacity considering the emergency situation

	in which the entire gas may have to be flared. The flaring should be done at a minimum height of 30 meter.
2.4.14	Unit to install Programme Logic Controller (PLC) based system for control of temperature and pressure inside the reactor.
2.4.15	Unit to install Programme Logic Controller (PLC) based auto activation for stopping of gas supply to the burner and for switching off the burners in case of increase of pressure and temperature inside the reactor.
2.4.16	Unit to install PLC based auto activation of bypass arrangements for bypassing the pyro gas from reactor to first separator tank in case of blocking /chocking of outlet vent inside the reactor or direct bypass for flaring
2.4.17	Unit to install PLC based carbon monoxide (CO) gas sensors connected with sirens (hooters) in case of release of CO.
2.4.18	The collection of the oil from the condensers should be in closed vessel and storage also should be in closed metallic tanks. (Oil / Liquid is stored at atmospheric pressure in metallic tank. Since this is not pressureized tank, there is no need of vent. The presence of vent releases low molecular weight HC into the air and creates odour, which is objected by the neighbourhood.) There should be no manual handling of oil. Transfer of oil should be carried out through pumps.
2.4.19	Unit to connect first separator tank with the oil storage tank for storing heavy oil fraction. There should not be any release valve at the first separator tank.
2.4.20	At the end of the pyrolysis process the reactor has to be cooled before the removal of char. During cooling process, the reactor should be purged with Nitrogen gas.
2.4.21	The removal of char should be started after the reactor temperature comes down to below 50 ^{o}C or first separator tank temperature comes down to 40 ^{0}C.
2.4.22	The inside temperature of the reactor should not exceed 500 ^{0}C and the first separator tank temperature should not exceed 450 ^{0}C during the entire batch operation.
2.4.23	Waste water (Pyro water/Purge water/Oil mixed water/oil water emulsion) generated during the process should not be discharged anywhere and:

i)	Should be treated in suitable ETP of sufficient capacity. Oily sludge should be disposed through TSDF or can used to make char briquettes, for subsequent transfer /sale to the cement manufacturing plants or other such industries having authorization for co – processing or;

a. ETP discharge may be used for briquettes manufacturing. The briquettes so manufactured shall be disposed through processing in cement kiln

b. ETP sludge may be used for briquettes manufacturing. The briquettes so manufactured shall be disposed through processing in cement kiln.

ii)	Pyro water/Purge water /Oil mixed water/oil water emulsion may be used for briquettes manufacturing in a briquetting plant by mixing it with sawdust and char in suitable proportions. These briquettes so manufactured using the pyro water/purge water/oil mixed water/oil water emulsion and char are to be utilized only in processes where temperature is 1000 ^{0}C or more to avoid emissions of obnoxious gases; or
iii)	Pyro water/Purge water/ oil mix water/oil water emulsion should be used for Initial heating of the reactor.

2.4.24	Unit to ensure that treated water be re-used in unit itself & there is zero effluent discharge.
2.4.25	Unit to have a covered /closed separate storage tank for storage of pyro water /purge water /oil mix water/ oil water emulsion. The pyro water be transferred from final storage tank to pyro water / purge water / oil mix water / oil water emulsion storage tank in closed loop through pumps.
2.4.26	Unit should carry out stack and ambient air quality monitoring for SO_2, PM and CO at least once in six months from a recognized laboratory at identified monitoring location. The unit shall maintain a log book for recording the plant, operation, monitoring of the stack emissions and ambient air quality, generation & utilization of wastewater & sale of various products and by-products.
2.4.27	The transportation of Char should be done in bags (small or jumbo) in closed vehicles to ensure that there is no spillage of char during their transportation.
2.4.28	The transportation of Tyre Pyrolysis Oil (TPO) should strictly be done in closed tankers to ensure that there is no spillage of TPO during their transportation.
2.4.29	The char generated in the process shall be utilized either in co-processing in the cement industry or its quality be upgraded to Recovered Carbon Black (RCB). RCB may be used as raw material for manufacture of new tyre and other processes.
2.4.30	The Tyre Pyrolysis Oil and char shall be stored in areas separate / distinct from the processing area (shed where the reactors are installed). Tyres shall be stored in earmarked area / open area on a paved platform.

B. Safety Measure to be adopted

2.4.31	Automatic control systems such as Programmed Logic Control (PLC) shall be adopted for measurement and control of temperature and pressure along with safety inter-locks in case of increase of temperature or pressure to cut off heating of the reactor should be provided. It should be ensured that the reactor is under positive pressure at all the time.
2.4.32	A sensor for CO gas to be installed in the working area to ensure that concentration of CO in the working area does not exceed the prescribed limits for occupational safety and health as per Factory Act 1948. It will also be coupled with a warning /alarm system so that the plant operator can take adequate steps to rectify the situation.
2.4.33	Sensors along with alarm system should be provided at all the transfer points throughout the plant to detect any leakage of flammable vapours from the system.
2.4.34	Fire detectors, sprinklers and fire hydrant with necessary pumping system and water storage should be provided in the process area, product and raw material storage area.
2.4.35	Unit to install fire hydrant system connected directly to the water tank and DG set for direct electric supply. Unit should also have ABC type fire extinguisher cylinders & fire buckets filled with sand and water.
2.4.36	The safety instruction for safe operation of plant will be displayed at the gate, plant working area and other critical places. Further, training will be imparted to the workers for safe operation of these plants.
2.4.37	On site emergency plan, as per the requirements under the Factories Act, 1948, will be made and implemented to handle any accident, fire/ leakage or any other emergency situation. All such measures shall include raw material storage, product storage and handling thereof.
2.4.38	The plant will be operated under the continuous supervision of a qualified person having experience of running such units.
2.4.39	All the persons /workers in the premises should wear an air filter mask to avoid inhaling of the fine char particles.
2.4.40	Unit will maintain good house-keeping and will ensure that no raw material products and wastes get spilled inside or outside the plant.
2.4.41	Unit to carry out annual health check-up of all the employees working in the unit & submit its report to concerned SPCBs/PCCs on annual basis.
2.4.42	Workers should be trained to handle fire. Workers should be given mock drill exercise for fire hazard incident. Assuming fire at the hatch door due to leakage of pyro-gas, what action, the workers should do? Training to use CO_2 type fire extingushers. Regular visit and inspection to check the training to workers.

2.5 Continuous Process (New & Existing):

A. Minimum Requirement for Environmentally Sound Operation:

2.5.1	Unit should have a valid Consent to Establish (CTE) and Consent to Operate (CTO) under Water and Air Act and Authorization under the Hazardous & Other Waste (M&TM) Rules, 2016 issued by SPCB /PCC & Fire Safety Certificate issued by the concerned department.
2.5.2	Unit to comply with emission & effluents standards as prescribed by the concerned SPCB/PCC in consent to operate (CTO) under Water and Air Act. Further the management of Hazardous Waste generated to be done as per the conditions prescribed in the authorization issued by the SPCB/PCC under the Hazardous Waste (M&TM) Rules, 2016.
2.5.3	The feeding system should be provided with an air-lock arrangement so that no air enters the reactor during feeding.
2.5.4	Initial heating of the reactor to be done either by using pyro gas stored during previous cycle itself or by use of purge water (oil mix water)/oil water emulsion, or by tyre pyrolysis oil or any other fuel approved by concerned SPCBs/PCCs. After generation of pyro gas, the same is to be used for the purpose of heating reactor. The flue gas should be vented out into the environment through alkaline scrubber with mist eliminator attached with a chimney of at least 30 meters height. Plants to install adequate air pollution control devices (APCDs) for controlling flue gas emissions.
2.5.5	A compressor or any other suitable arrangement has to be made /installed for mixing of air with pyro water for ensuring proper burning while using pyro water/purge water during initial heating.
2.5.6	In order to control fugitive emissions from the reactor during operation, proper sealing should be ensured.
2.5.7	Excess pyro gas if any should be flared through properly designed flaring system of adequate capacity considering the emergency situation in which the entire gas may have to be flared. The flaring should be done at a minimum height of 30 m.
2.5.8	The collection of the oil from the condensers should be in a closed vessel and storage also should be in closed tanks with suitable vents. There should be no manual handling of oil. Transfer of oil should be through pumps.
2.5.9	The removal of char should be through a mechanized system. The unloading of char from the reactor is to be done under controlled conditions through a pneumatic /screw conveyor system in such a manner that the contents of the reactor are not open to the atmosphere at any point of time. The end of the conveyor system shall be attached to a bagging plant where all the char will be bagged in the HDPE bags with proper sealing. It should be ensured that no spillage taken place during the collection of the char in the bags. Moreover, an air-lock should be provided to ensure no entry of air into the reactor.

2.5.10	Water sprinklers to be installed at the transfer points for arresting fugitives.
2.5.11	The char generated in the process shall be utilized either in co-processing in the cement industry or its quality be upgraded to Recovered Carbon Black (RCB). RCB may be used as raw material for manufacture of new tyre and other processes.
2.5.12	Waste water (Pyro water/Purge water/Oil mixed water/oil water emulsion) generated during the process should not be discharged anywhere and:

i)	Should be treated in suitable ETP of sufficient capacity. Oily sludge should be disposed through TSDF or can used to make char briquettes, for subsequent transfer /sale to the cement manufacturing plants or other such industries having authorization for co – processing or;

a. ETP discharge may be used for briquettes manufacturing. The briquettes so manufactured shall be disposed through processing in cement kiln

b. ETP sludge may be used for briquettes manufacturing. The briquettes so manufactured shall be disposed through processing in cement kiln.

ii)	Pyro water/Purge water /Oil mixed water/oil water emulsion may be used for briquettes manufacturing in a briquetting plant by mixing it with sawdust and char in suitable proportions. These briquettes so manufactured using the pyro water/purge water/oil mixed water/oil water emulsion and char are to be utilized only in processes where temperature is 1000 ^{0}C or more to avoid emissions of obnoxious gases; or
iii)	Pyro water/Purge water/ oil mix water/oil water emulsion should be used for Initial heating of the reactor.

2.5.13	TPO Units to ensure that treated water be re-used in the unit itself & there is zero effluent discharge.
2.5.14	The transportation of Char and Tyre Pyrolysis Oil (TPO) should strictly be done in closed vehicles to ensure that there is no spillage of char or oil during their transportation.
2.5.15	The generation, transportation and disposal of char to the cement manufacturing plants shall be recorded
2.5.16	The Tyre Pyrolysis Oil (Product) and char shall be stored in areas separate / distinct from the processing area (shed where the reactors are installed). Tyres shall be stored in earmarked sheds/open area on a raised cement concrete platform.

2.5.17	The unit should carry out stack and ambient air quality monitoring for SO2, PM, and CO at least once in six months from a recognized laboratory at identified monitoring location. The unit will maintain a log book for recording the plant operation, monitoring of the stack emissions and ambient air quality, generation & utilization of wastewater & sale of products and wastes.

B. Safety Measure to be adopted

2.5.18	Automatic control systems such as Programmed Logic Control (PLC) shall be adopted for measurement and control of temperature and pressure along with safety interlocks in case of increase of temperature or pressure to cut off heating of the reactor should be provide.
2.5.19	A sensor for CO gas to be installed in the working area to ensure that concentration of CO in the working area does not exceed the prescribed limits for occupational safety and health as per Factory Act 1948. It will also be coupled with a warning/alarm system so that the plant operator can take adequate steps to rectify the situation.
2.5.20	Sensors along with alarm system should be provided at all the transfer points throughout the plant to detect any leakage of flammable vapors from the system.
2.5.21	Excess pyro gas if any should be flared through properly designed flaring system of adequate capacity considering the emergency situation in which the entire gas may have to be flared. The flaring should be done at a minimum height of 30 meters.
2.5.22	Fire detectors, sprinklers and fire hydrant with necessary pumping system and water storage should be provided in the process area, product and raw material storage area.
2.5.23	The TPO unit shall possess fire clearance certificates issued by concerned departments.
2.5.24	The safety instruction for safe operation of plant will be displayed at the gate, plant working area and other critical places. Further, training will be imparted to the workers for safe operation of these plants. On site emergency plan, as per the requirements under the Factories Act, 1948, will be made and implemented to handle any accident, fire/ leakage or any other emergency situation. All such measures shall include raw material storage, product storage and handling thereof.
2.5.25	The plant will be operated under the continuous supervision of a qualified person having experience of running such units. All the persons/workers in the premises should wear an air filter mask to avoid inhaling of the fine char particles.
2.5.26	Units will maintain good house-keeping and will ensure that no raw material products and wastes get spilled inside or outside the plant.

2.5.27	Units to carry out annual health check-up of all the employees working in the unit & submit its report to concerned SPCBs /PCCs on annual basis.
2.5.28	Units operators shall have insurance cover for workers, plant & machinery and materials.
2.5.29	Workers should be given mock drill exercise for fire hazard incident.

C. General conditions applicable to all plants (Batch & Continuous):

2.5.30	The Tyre Pyrolysis Units (Continuous and Advanced Batch Automated Pyrolysis) are categorized into Orange category. Unit to register on the Waste Tyre EPR Portal of CPCB.
2.5.31	The Tyre Pyrolysis Oil unit to fulfill fuel quality as specified by Ministry of Petroleum and Natural Gas / Bureau of Indian Standards as and when the same gets notified.
2.5.32	In line with the policy adopted by MoEF&CC, Unit shall not to import waste tyres for the purpose of TPO production. Unit to use only indigenous generated waste tyre (i.e. Waste tyre generated in India only). Also unit to sell its products to Actual Users only.
2.5.33	Unit to maintain record on consumption of waste tyre along with details of its procurement source, Details & quantity of products, details of actual users to whom products have been sold.
2.5.34	Unit to submit its annual report on the EPR Portal and also to the concerned SPCB providing details on annual production of TPO, Char, Steel & other products including details of sources of purchasing waste tyre and also details of actual users to whom products have been sold within the time frame as prescribed on the Portal. The annual report to be supported with electricity bills of the financial year for which annual return has been submitted.
2.5.35	Units have to report daily waste generation, disposal data on National Hazardous Waste Tracking system as and when such system gets implemented by CPCB.

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