



CHAPTER – VI

ACTION PLAN

As logical outcome of the inventorisation effort, an action plan has been developed for more effective implementation of HW Rules.

6.1 Documentation / Inventory upgradation :

- An inventory is in a dynamic state and needs to be updated continuously as various factors viz change in technology, expansion / modernization of existing units, creation of new sources will govern the hazardous waste generation. It is proposed to take-up upgradation of inventory on a quarterly basis.
- As a strengthening measure for this inventory, in-plant audit shall be carried out to verify the authenticity of submitted data by industrial units as well as to achieve correct quantification of waste generation due to manufacturing process and or technology. Candidate manufacturing units shall be selected to represent category as well as technologies employed by various sectors of industry.
- Training shall be given to officers involved in consent management to impart requisite knowledge of various provisions of the HW Rules as well as to attain desired understanding of processes and activities leading to generation of Hazardous Wastes.
- A special cell has been created for supervising hazardous waste management. Necessary training shall be given to the officers in this cell for proper understanding of the legal aspects of Hazardous Waste Rules as well as advanced training in waste audits.
- As a capacity building measure, uniform documentation and record maintenance procedure shall be adopted in all Regional Offices to enable easy access to desired data. This will enable officers to function more effectively irrespective of postings as also facilitate creation of central database.
- Industries submitting consent applications shall be asked to submit complete information in respect of raw materials, catalyst, intermediates



and finished products in the consent application. Material balance in respect of all products will also have to be furnished to enable Board officers to assess correctness of information submitted particularly in terms of waste generation.

- Submission of concerned documentation, particularly copies of manifest and returns in Form 4 to respective Regional Offices shall be made obligatory. This will enable the concerned local offices to track movement of hazardous waste in their jurisdiction as well as to keep tabs on the actual quantity of hazardous waste disposal vis a vis quantity declared in the application for grant of consent / authorization.
- A computerized / on-line tracking system for manifest shall be put in place, so as to make proper tracking of hazardous wastes possible.
- All movement of hazardous waste including to recyclers / reprocessors shall be strictly through the manifest route.
- An effort shall be made to create a web-based on-line hazardous waste data base as envisaged under National Hazardous Waste Information System (NHWIS) The manifest system should be linked to this data base so that status of compliance will be known immediately.

6.2 Non-Industrial Sources :

As seen in the inventory a substantial quantity of hazardous waste is generated by non industrial sources. MPCB has already initiated several measures for bringing the wastes from ports / air ports in the form of sending un-cleared hazardous chemicals cargo for proper disposal. However, the ports / airports also have other hazardous waste generation as seen in the inventory report, which need additional actions. Following actions are being considered :

- Require all such generators to obtain authorisation from the Board to bring them under the regulatory mechanism.
- In addition to un-cleared hazardous cargo, ports / airports have own generation of used oil and non ferrous metal scrap which will thus be properly regulated / disposed off.
- Power transmission and distribution activity results in generation of



spent transformer oil. The quantity of such oil is substantial and management of this waste needs to be regulated. All agencies in Maharashtra engaged in power transmission / distribution shall be asked to follow procedure as laid down under The Hazardous Waste Rules for management of this waste.

- A targeted program shall be taken up for environmental improvement of automotive service stations which are presently only covered partially under consent / authorization mechanism. As first step, all service stations attached to automotive manufacturers, large fleet owners and oil companies shall be asked to follow procedure as laid down under The Hazardous Waste Rules for management of wastes generated in their establishments. Subsequently they will also be brought under consent mechanism to ensure that steps for Water Pollution Control / Hazardous Waste Management / Air Pollution Control and disposal of waste batteries are taken as per the relevant Rules.
- The disposal of used batteries to automotive electrical repair shop is already being closely regulated through a combination of measures targeted at battery suppliers / importers and bulk consumers. These measures shall be continued to regulate the battery sector on the basis of Environmentally Sound Technologies.