

Central Pollution Control Board, Delhi

IT Division

C-12011/33/2017-18-Tech /2059

April 09, 2018

Sub: Minutes of the meeting on "Introduction of Revised Protocol for compliance Reporting" held during 16th March, 2018 to 23rd March, 2018

Series of meetings & Video Conferences were held under the chairmanship of Member Secretary, CPCB attended by SPCBs/PCCs, RDs, Industry Associations, Technology Providers etc. List is at Annexure-I.

"Compliance Reporting Protocols" have been developed to strengthen the system of Online Continuous Emission/Effluent Monitoring Systems being deployed across country in 17 Categories, GPI and other highly polluting industries. The guidelines for Effluent & Emission Monitoring Systems were published in Nov. 2014 & 2017 respectively. Following these guidelines Protocols have been prepared.

Sh. Aditya Sharma, Sc.'D', presented the protocols and objective of developing this tool. He explained that the protocol will guide the industrial units in selection, installation, calibration and operation of instruments (OCEMS) and verification of systems.

These protocols are made to collect information of emission and effluent discharged from the industries monitored through OCEMS installed at industry. Details of four parts (I, II, III & IV) of the protocol were explained, which industry needs to submit once and periodically and every time when major repairs are carried out in the analysers or when Air Pollution Control Devices are changed. These protocols will be made available online at website <http://cpcb.nic.in/Online-Monitoring-Industrial-Emission-Effluent/> through software before 15th April, 2018. Once the software is made LIVE, the industry will have to submit information within 45 days. Draft protocols were placed in public domain for comments, and were finally implemented as mandatory on 13th March, 2018 on each industry operating OCEMS.

The meetings schedules are as below:

S. No.	Meeting with	Date and Time
1.	Technology Providers	16 th March, 2018 11:00 AM -14:00 PM
2.	IPC- I and WQM-II & Industrial Associations	20 th March, 2018 11:00 AM -14:00 PM
3.	SPCBs/PCCs	21 st March, 2018 14:00 AM -17:00 PM
4.	IPC-II, IPC-III and IPC-IV & Industrial Associations	23 rd March, 2018 11:00 AM -14:00 PM

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Key discussions/decisions taken place during the meeting are summarized below:


Sl. No.	Stake Holder	Discussions	Resolutions
1.	Technology Providers	<p>1. <u>Clarification on Dew point and Moisture Content:</u> As per the Guideline, “Opacity meters are not suitable for stacks with flue gas below dew point or containing droplet from wet collectors”- which needs a clarification on dew point. It was also mentioned that opacity is not applicable in case flue gas contains moisture. M/s Forbes Marshall, emphasized that they have got the certification for their opacity meters which can measure Opacity/Dust in moisture conditions also.</p>	It was decided that the matter will be re-considered and suitable modifications will be made.
		<p>2. <u>Clarification on Low Concentration Measurement by Opacity Meters:</u> As per the Guideline, “Opacity Meters cannot monitor particulate levels below 25mg/m3 per meter path-length” whereas M/s Forbes Marshall claimed that the TUV Certification for measuring the PM/ Dust values below 10 mg/Nm3.</p>	It was clarified that the certification mentions the condition of stack diameter 5meters. However, a suitable decision will be taken.
		<p>3. <u>Clarification on NDIR Technology as In-Situ/Extractive:</u> As per the Guideline, In-situ NDIR cannot measure low levels whereas Extractive NDIR is able to measure the low concentration. Argument was how the same technology is not applicable for the extractive method.</p>	Will be examined.
		<p>4. <u>Clarification on Multiplexing</u> Guideline stated possibility of multiplexing in the technologies, but silent on whether it is allowed by CPCB or not.</p>	It was clarified that as per the recent scenario, multiplexing is not allowed. However, a decision in this regard will be taken.
		<p>5. <u>Clarification on Multipoint Calibration</u> As per the Guideline, “The system shall be rechecked for its health and data accuracy and reliability, following multi point calibration (at least 03 span concentrations) using standard methods and certified reference</p>	CPCB clarified that at least three point calibration is a must otherwise linearity of the device can't be established.

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		materials.” Technology providers, mentioned difficulty in carrying out the multipoint calibration.	
2.	IPC- I and WQM-II & Industrial Associations	<p>1. 15 Minutes duration should be enhanced as there are maintenance processes like Boiler De-dusting which require more time:</p> <p>2. Std. Deviation is calculated instead of deviation as was proposed.</p> <p>3. Alerts are also generated on the basis of data discontinuation, but during plant shut down and plant maintenance, these alerts are continued. Hence, industry should be provided a window to inform.</p> <p>4. Associations requested to keep sending test mails of connectivity if no exceedances are occurring in the real time data to ensure their communication with central system.</p>	<p>It was intimated that the First Color coded alert is generated when the exceedance is more than 40% of the prescribed standard for eight (08) consecutive readings or 8 times in a day for effluent and the exceedance is more than 25% of the prescribed standard for eight (08) consecutive readings or 8 times in a day for effluent which is already quite liberal. The standards will be made more stringent rather than relaxing.</p> <p>It was agreed and informed that software will be modified accordingly.</p> <p>It was informed that the window is already available through cems.cpcb@nic.in email; however a system based window may be considered.</p> <p>It was agreed and informed that software will be modified accordingly.</p>
3.	Video conference with Regional Directorates and SPCBs/PCCs	<p>1. Jharkhand SPCB has requested for integration of camera feed at CPCB Central Portal.</p> <p>2. RD – Vadodara suggested to get auxiliary parameters mentioned in the CTO to remove the confusions.</p> <p>3. MP-SPCB requested to legalize the OCEMS.</p>	<p>It was informed that efforts will be made to provide camera data on central portal also.</p> <p>It was agreed.</p> <p>It was informed that the ultimate target is minimized physical inspection with maximum use of technology.</p>

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		4. It was suggested that CPCB should give direction for remote calibration to SPCBs and SPCBs in turn should issue the direction to Industries.	Will be discussed and suitably resolved.
4.	IPC-II, IPC-III and IPC-IV & Industrial Associations	1. There was a doubt w.r.to auxiliary parameters like O2, CO2, Temp etc.:	It was clarified that without these parameters data corrections as stipulated in the standards can't be implemented, hence, these are mandatory.
		2. Requested clarity on monitoring of Circular and Rectangular stacks and Ducts.	It is already clarified in the Guideline.
		3. CMA requested CPCB to start a course for certification of Environmental Specialist under National Skill Development Mission.	It was informed that at present there is no plan.
		4. Associations queried about Empaneled Laboratories for Instrument Calibration and operation which are accredited by CPCB.	Will be discussed and suitably resolved.
		5. Ministry of commerce of Tamil Nadu and CMA requested that that they are willing to organize workshops for their industries in which CPCB team may make presentation about OCEMS.	It was informed that suitable decision will be made.
		6. TN Associations informed that TNPCB has directed tanneries in Tamilnadu to install flow meter and camera even though these are ZLD units, by virtue of sending their effluent to CETP.	It was informed that since these units are sending their effluent to CETP, as per CPCB directions these units have to install camera and flow meter and connect to CPCB & SPCB.
		7. Calibration at different plant load is impossible. In this regard it was informed that these units have to monitor the stack flue gas emission at any time whenever their plant is running at low capacity so that linearity of measurement device could be established.	It does not mean that plant capacity will be reduced and monitoring will be conducted and there will be loss of production. It has to be done on any day before the deadline of submission of information for Compliance Reporting Protocols.

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		8. Requested empanelment of Technology providers by CPCB	It was not agreed.
		9. Registration of calibration gas suppliers	It was informed that proposal to register these suppliers is already in the pipeline and procedure for the same is likely to be created.
		10. CPCB should provide the revised mandatory parameters list.	It was agreed.

Meeting ended with thanks to the Chair.


 (Aditya Sharma)

Sc.'D', IT Division

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