

**AGENDA ITEMS FOR 94th MEETING OF THE TECHNICAL REVIEW
COMMITTEE (TRC)**

Date: 14th July, 2025

Time: 11:00 AM

Venue: Online mode

Agenda.1. Crumb rubber modifier to be blended in bitumen for use in road construction in view of the recommendation given in circular Economy Report on ‘Tyre and Rubber Recycling Industry’ and subsequent Circular Economy Action Plan Finalized by NITI Aayog.

The use of crumb rubber modifier to be blended in bitumen for use in road construction at refinery level and also took opinions of various stakeholders on its production, constraints, facility upgrades, techno-economic viability issues, safety, extent of limit for blending etc. The views and recent updates on R&D were taken from various delegates of organization like Ministry of Road, Transport and Highways (MoRTH), BPCL, IRC, NHAI etc.

According to NHAI, in India, around 3 Lac MT/ annum of CRMB (mostly grade 55 & 60) are used as per IRC 107 specification i.e. for Bitumen Concrete (BC) and are being projected for more use. It was also informed that MoRTH has already issued guidelines regarding the usage of CRMB, PMB etc. for construction of roads in August, 2023 in consultation to the CRRI and other stakeholders.

The matter was last discussed in 93rd meeting of TRC, and after deliberation upon the matter the committee felt that more discussion is required on the matter and asked from representative of MoRT&H to create a proforma detailing the potential demand for CRMB, how much and where it is being used and coordinate with NHAI to share the actual data of consumption of CRMB and PMB during construction of roads with some documentary support. Committee also requested MoRTH to share experience with respect to non-refinery sources of CRMB and PMB.

Now, MoRT&H has provided the details. Accordingly, the matter is placed before TRC for deliberation/decision in the matter.

Agenda.2. Amendment to Hazardous and other Waste (Management and Transboundary Movement) Rules, 2016 by Department of Chemicals and Petrochemicals (DCPC), Ministry of Chemicals and Fertilizers.

Department of Chemicals and Petrochemicals (DCPC) vide D.O. letter dated 27th January, 2025 and 03rd April, 2025 has inter-alia requested deletion of entry pertaining to Brine Sludge listed at S.No.16.3 of Schedule I (List of Processes generating hazardous wastes) under Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016. It is mentioned that this issue has been examined at their end through multiple stakeholder discussions.

It is further mentioned that the production of caustic soda and chlorine is listed in Schedule I of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 (at S. No. 16) as excerpted below:

S. No.	Processes	Hazardous Waste
(1)	(2)	(3)
16.	Production of caustic soda and chlorine	16.1 Mercury bearing sludge generated from mercury cell process 16.2 Residue or sludges and filter cakes 16.3 Brine sludge

The industry has pointed out that the use of mercury has been phased out in the production of caustic soda and that it has adopted the eco-friendly membrane cell technology. The Alkali Manufacturers' Association (AMAI) had requested exclusion of brine sludge (entry no. 16.3 above) generated from membrane cell caustic soda plants from Schedule I of the said rules. In response, Ministry of Environment, Forest and Climate Change had issued O.M. dated 23-206/2014-HSMD dated 2nd May, 2016 stating that "non-mercury bearing sludge from membrane cell caustic soda plants are non-hazardous.

However, due to lack of corresponding amendment in the rules, SPCBs have not recognized the validity of the above mentioned OM resulting in confusion and inconsistent enforcement across states.

DCPC inputs:

DCPC suggested that the request of the industry merits consideration. Further, it is apparent that the entry at Sl. No. 16.1 takes care of any sludge, which is generated from chlor-alkali industry, which bears mercury. Such a sludge is clearly deemed as hazardous, as it is covered under the definition of Hazardous waste and requisite compliance is required to be done.

The industry has mentioned that the sludge which is now being generated from the chlor-alkali industry is from a process, which no longer uses mercury in terms of Minamata Convention to which India is a signatory. Therefore, it is a non-mercury bearing sludge. Hence, it should not be treated as a hazardous waste on account of entry at Sr. No. 16.3 as above, which specifies 'Brine Sludge' as a hazardous waste. Hence, it is felt that deletion of the entry at S. No. 16.3 could be considered while retaining the entry at S. No. 16.1.

Accordingly, the matter is placed before EC for deliberation/decision in the matter.

Agenda.3. Request for withdrawal of distance criteria for setting up of Treatment, Storage and Disposal Facility - Representation from Jigani Industries Association, Bengaluru and Kanara Chamber of Commerce & Industry (KCCI), Mangaluru.

Jigani Industries Association, Bengaluru and Kanara Chamber of Commerce & Industry (KCCI), Mangaluru *vide* their letters dated 21.04.2025 and 22.04.2025 respectively have requested for withdrawal of distance criteria for setting up of Treatment, Storage, and Disposal Facility for hazardous waste. It is mentioned that Micro, Small and Medium Enterprises (MSMEs) are facing significant financial and logistical challenges due to the limited number and remote location of Treatment, Storage, and Disposal Facilities (TSDFs) leading to high operational costs, greater environmental risks, and compliance difficulties.

It is further mentioned that as per the Annual Inventory of Hazardous and Other Wastes Management (2022-23) submitted by KSPCB to CPCB, Karnataka generated 97,113.85 MT of hazardous waste. Out of 97,113.85 MT of hazardous waste generated

annually in Karnataka, approx. 53,204 MT (over 54%) is generated in central and Coastal district of Karnataka alone which underlines the urgent need for more accessibility.

The Ministry O.M. dated 20.06.2013 and 29.08.2016 mandates a minimum distance of 400 km between new and existing common TSDFs for hazardous wastes. This restriction has prevented the establishment of additional TSDFs particularly in industrially underserved regions and further restricted the development of essential infrastructure and created a compliance and cost burden for industries across Karnataka. Many states like Gujarat, Maharashtra, U.P. W.B. and Rajasthan, multiple TSDFs operate within 400 km of each other, enabling better waste management without compromising environmental safety.

In light of above, it is requested to withdraw or revise O.M. dated 20.06.2013 and 29.08.2016 and approve or allow for the establishment of new TSDF facility in Central Karnataka to cater to Coastal and Central districts.

Accordingly, the matter is placed before EC for deliberation/decision in the matter.

AGENDA ITEM No. 4: ANY OTHER ITEMS WITH PERMISSION OF THE CHAIR
