

AGENDA ITEMS FOR 78th MEETING OF THE TECHNICAL REVIEW COMMITTEE
(TRC)

Dated: 17th May, 2023

Time: 10:00 AM -12:30 PM

Venue: Through Video Conferencing

Clarification with respect to Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016

Agenda 1. Use of Crumb Rubber recovered from waste tyres for building Green Roads by Material Recycling Association of India (MRAI).

MRAI has mentioned that the usage of CRMB material in road construction would also ensure safer and superior roads with more cost-effectiveness. It is also stated that major institutes like CRRI, and HRS-Chennai, IIT's have done extensive research which confirms that roads made with CRMB will last longer, reduce noise pollution, help in increasing axle load ability, and in the process create a very safe and efficient use of waste tyres, that would otherwise be used in illegal and polluting applications like pyrolysis.

IRC 37:2018 (relevant pages enclosed) recommends the use of modified bitumen only for highways handling traffic 50 MSA and above while considering the merits of Modified bitumen, it should be used for other types of roads as well. The directions may also be issued by MOEFCC to make a minimum of 30% of roads with CRMB

The matter was discussed in 75th & 76th Meeting of TRC. The committee was of the opinion that MRAI needs to provide requisite details as mentioned by representative of MoRTH. The committee also felt that interaction with few big contractors who have used CRMB in road building is required to understand the feasibility of using CRMB in building roads. Accordingly, matter was deferred for re-consideration by the TRC after receipt of requisite details.

MRAI vide mail dated 31st march, 2023 has submitted the details. **Accordingly, the matter is placed before the TRC for deliberation/decision.**

Agenda 2. Representation from Tyre and Rubber Recyclers Association of India (TRRAI) for amendment in grant of permission of import of 50,000 Mt/Annum of used tyre scrap for M/s Finster Black Private for manufacturing of recovered carbon black.

In 76th Meeting of TRC, the committee after detailed deliberation upon the issue recommended that the permission for import of 50000 MT of Used tyre scrap in baled/multicut form for production of Recovered Carbon Black (RCB) which will replace the virgin Carbon Black in

manufacturing Industry, may be granted initially for a period of 3 years on pilot basis with following conditions to be levied while granting permission:

- i) The process should result in a yield of RCB comparable to the yields being obtained in other well established plants for manufacture of RCB. 100% of the RCB produced by the units should be sold to manufacturer for replacing the virgin carbon black. The recovered other byproducts during the process should conform to relevant specifications and no part of the recovered carbon should go for energy recovery or any other use or to landfill.
- ii) The units should have commensurate electricity consumption.
- iii) The sale to the manufacturing units shall be verified through GST paid and other supporting evidence.
- iv) The permission will be issued only after verification from CPCB which will be carried out annually.
- v) Fresh Investment of minimum Rs. 25 crore from 1.4.2022 onwards.
- vi) Minimum land area of 5 acres of the unit.
- vii) The process should be completely automated and environment friendly with zero emission of carbon black particle in environment.
- viii) The RCB end product should be in the form of granule to check the dispersion in the environment.
- ix) Whole process of production of RCB from waste/scrap tyre should be completed in the same premises.

The above recommendation of TRC was approved by the competent authority in the Ministry.

Subsequent to the above decision, TRRAI vide letter dated 6th April, 2023 has raised their concerns on the recommendations of TRC and requested Ministry to revisit the decision of TRC w.r.t. to the following points: -

- (i) Fresh Investment of minimum Rs. 25 crores from 1.4.2022 onwards.
- (ii) Minimum land area of 5 acres of the unit.
- (iii) Whole process of production of RCB from waste/scrap tyre should be completed in the same premises.

TRRAI has further requested that no permission for import of waste tyre for production of Recovered Carbon Black (RCB) should be granted till the decision on the above points.

Agenda 3. Regarding Classification of Unvulcanised materials during tire manufacturing process as waste or by-product - Representation from M/s Bharti Rubber Overseas

M/s Bharti Rubber Overseas (BRO) has sought clarification whether Rubberized Nylon Friction, Rubber Compound, Rubberized steel friction, Fabric Carcass and Green Tires, which are unvulcanised in nature are waste or by-product and require permission for import by MoEF&CC or not. Similar representation from DGFT regarding import of Moulded Rubber Articles Scrap/ Conveyor Belt scrap/Rubber Article scraps/ Pairings/ Rubberised Nylon Friction Cord/

Rubberized steel friction cord/Rubber Compound /Lumps (Cut/Shredded/Press/Baled/Sheets/ Chips/Rolls) for manufacture of Crumb rubber/rubber products were discussed in 69th Meeting of TRC held on 19th February, 2020 and the committee noted that waste and scrap of hard rubber, other rubber wastes and waste pairings and scrap of rubber falls under B3040 and B3080 of Part B, Schedule III of HW Rules, 2016. As such all these items need permission from this Ministry.

The matter was last discussed in 71st Meeting of the Technical Review Committee (TRC) held on 4th February, 2022 and the recommendation of the committee is as follows:

“The committee heard the presentation made by the representative of the company and recommended that these goods fall under HOWM Rules, 2016 and requires permission from this ministry as per the earlier decision taken in 69th meeting of TRC held on 19th February, 2020. Further, the committee also recommended that representative of Automotive Tyre Manufacturers Association (ATMA) and /or other similar organization may be invited in the next meeting of TRC to understand how Tyre Manufacturers classify these items being generated indigenously for further deliberation/decision in the matter.”

Matter was also listed in the Agenda of 72nd meeting held on 30th May, 2022. However, due to paucity of time, the committee decided to discuss the issue in the forthcoming meeting of TRC.

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

Agenda 4. Request for categorization of ETP Sludge (i.e. Red/White Gypsum generated from effluent water neutralization process) as co-product – M/s Travancore Titanium Products Limited.

M/s Travancore Titanium Products Limited (TTPL) has informed that they manufacture Titanium Dioxide Pigment. TTPL is operating Effluent Treatment Plant (ETP) continuously for neutralizing the effluent generated during the production process and during the effluent water neutralization process, White and Red Gypsum is generated. Around 364 MT gypsum per day is generated and is stored in the plant premises as per the protocol. Currently, a portion of white Gypsum produced is sold to Cement companies on trial basis. Also, a small portion of Red Gypsum is used for making B caps and Tetra Pots on trial basis.

TTPL has further informed that M/s Anacon Laboratories Pvt Ltd, Nagpur, has conducted field survey, characterization of ETP by products leachate through TCLP, analysis of all possible hazardous components in all inputs and outputs of production process as per schedule II of HOWM Rules, 2016 and its report shows all parameters are well within the permissible limits.

TTPL has also mentioned that Kerala State Pollution Control Board (KSPCB) has carried out inspection and conducted TCLP study of the ETP sludge and found all parameters including heavy metals are well within the limit. The letter dated 05.02.2022 of KSPCB in this regard is attached in the representation.

In view of the above, TTPL has requested to consider this matter and categorized ETP Sludge (i.e. Red/White Gypsum generated from effluent water neutralization process) as co-product.

Agenda 5. Any other item(s) with permission of the chair.
