

F.No.23/130/2024-HSM
Government of India
Ministry of Environment, Forest and Climate Change
(HSM Division)

2nd Floor, Jal Block
Indira Paryavaran Bhawan
Jor Bagh Road, Aliganj
New Delhi -110 003

Date: 06th December, 2024

Subject: Consideration of Hydrochloric Acid generated from various processes as by-product/co-product as per the provisions of Hazardous & Other Waste Rules, 2016 - reg.

References:

- i. Request of M/s KLJ Organics Limited (Unit II), Jhagadia, Gujarat for consideration of Hydrochloric Acid (HCL with purity 32% and above) as by-product produced from consented/permitted Benzyl products i.e. Benzyl Chloride, Benzaldehyde and Benzyl Alcohol.
- ii. Request of M/s Gujarat Fluorochemicals Limited, Panchmahal, Gujarat for consideration of Hydrochloric Acid as by-product produced from manufacturing process of Benzo Trichloride (BTC) & Vinylidene Difluoride (VDF).
- iii. Request of M/s Gujarat Fluorochemicals Limited, Bharuch, Gujarat for consideration of Hydrochloric Acid as by-product produced from manufacturing process of R-22 & R -142b and
- iv. Request of M/s Anaven LLP, Valsad, Gujarat Consideration of Hydrochloric Acid generated from manufacturing of Monochloroacetic acid (MCA) as by-product/co-product as per the provisions of Hazardous & Other Waste Rules, 2016.

This pertains to several representations received in the Ministry regarding Consideration of Hydrochloric Acid generated from various processes as by-product/co-product as per the provisions of Hazardous & Other Waste Rules, 2016 under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.

2. The representations were referred to the Technical Review Committee (TRC) constituted in the Ministry for examination. TRC had a deliberation on the matter in its 81st meeting, 85th meeting, 86th meeting, 88th meeting and 89th meeting held on 16th October, 2023, 12th March, 2024, 03rd April, 2024, 20th August, 2024 and 23rd October, 2024 respectively. After detailed deliberations and as advised by CPCB, the committee opined that the HCL with purity 32% and above may be considered as by-product by the respective SPCBs/PCCs (state of origin), to be supplied to end user only, subject to the following:

- i. Units should have proper equipment/technology to produce HCL with purity of 32 per cent and above, which only can be declared as by-product.
- ii. Sales to be made only to end users and no sales to be allowed to traders.
- iii. Submission of details of end users to whom the HCL is to be supplied and verification of the same by the SPCB/PCC of the requirement of such end users, especially their capacity to use such HCL purchased.

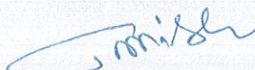
- iv. The movement of HCL from Producer to End User as per procedure prescribed by SPCB/PCC and under GPS tracking.
- v. Quarterly report of HCL produced and supplied by a unit to end user should be submitted/ uploaded on the portal of the concerned SPCB/PCC.

The above details may be furnished to the SPCB/PCC which will place the matter before the committee constituted for this purpose in SPCB which may classify the HCL as by-product if the above conditions are complied with. SPCBs may regularly check and ensure compliance of the condition stipulated in the permission granted to them.

Further, as suggested by GPCB, committee also recommended that monitoring by CPCB shall be arranged for the inspection, sampling and analysis of the TOC in case of M/s Anaven LLP, Valsad, Gujarat.

3. The matter has been examined in the Ministry and the recommendations of the TRC are agreed to.

4. This issues with the approval of the Competent Authority.


(Ved Prakash Mishra)
Joint Secretary

To,

1. The Member Secretary, Central Pollution Control Board, Parivesh Bhawan, East Arjun Nagar, Shahdara, Delhi - 110 032.
2. Member Secretaries of All SPCBs/PCCs (as per list)

Copy to:

1. M/s KLJ Organic Limited, Plot No. 760, GIDC, Industrial Estate, Jhagadia - 393110, Gujarat.
2. M/s Gujarat Fluorochemicals Limited, Plot no.D-2/CH-173 & Ch-222, Dahej GIDC-2, Village- Galenda, Taluka-Vagra, Bharuch-392130, Gujarat.
3. M/s Gujarat Fluorochemicals Limited, Survey no.16/3, 26, 27, Village - Ranjitnagar, Ghoghamba, Panchmahal-389380, Gujarat.
4. M/s Anaven LLP, Village-Atul -396020, Valsad, Gujarat.