

Draft Amendment in Environment (Protection) Rules, 1986 by MoEF&CC

Clause	Comments/ Suggestions
<p>5A, in column 4, for item III</p> <p>“III. Specific water consumption shall not exceed maximum of 3.0 m3/MWh for new plants installed after the 1st January, 2017 and these plants shall also achieve zero waste water discharge.”;</p>	<p><u>For New Plants:</u> Term ‘new plants installed’ should be replaced with ‘Plants receiving Consent to Establish(CTE) after 1st Jan 2017’ because TPPs in post construction/project phase may not be able to achieve water consumption limit of 3.0 m3/MWh.</p> <p>For New plants as well as for existing plant the limit set is ok but relaxation should be given for water consumption limit in case of part load operation as water consumption does not reduce linearly w.r.t. to unit loading.</p> <p><u>For Existing Plants:</u> For existing CT based plants commissioned pre 2003, specific water consumption shall not exceed 4.0 m3/MWh.</p>
<p>after serial number 33</p> <p>33A. Thermal Power Plants with Flue Gas Desulphurization (FGD) – Stack Height –</p> <p>Power generation capacity:</p> <p>- 100 MW and above H=6.902(QX0.277)0.555 Or 100 m whichever is more</p> <p>- Less than 100 MW H=6.902(QX0.277)0.555 Or 30 m whichever is more”;</p> <p>Q = Emission rate of SO2 in kg/hr H = Physical stack height in meter.”.</p>	<p>“33 A” For pre 2003 plants above chimney height criteria shall not be applicable and shall continue to govern by their existing consents</p>
<p>General Comments</p>	<p><u>NOx emission norms:</u> For reduction of NOx, the limitation of the available abatement technologies is a major difficulty to achieve the specified norms. Following are the major issues were faced by thermal power plants to reduce the NOx emission level.</p> <ol style="list-style-type: none"> High Ash in Indian Coal. Performance degradation of boilers. Feasibility of available technology with current Indian power business. Limitation of available technology. Lack of O&M expertise of technology. Retrofitting Issues with existing boilers.

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	<p>Hence, the NOx emission norms may also be considered for some relaxation (less than 600 mg/ Nm³) based on various practical and operation difficulty of existing thermal power plants.</p> <p><u>Provision of incentive for emission Control:</u> It is our suggestion that, some incentive scheme has to be initiated for promotion of emission reduction in thermal power plants particularly for capital intensive items like FGD. Incentive in tariffs for achieving the norms before due dates for existing power plants, shall attract generators to make the necessary investments for a greener future.</p>