



HARYANA STATE POLLUTION CONTROL BOARD
C-11, SECTOR-6, PANCHKULA
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Dated:

No. HSPCB/HW/2016/

To

1. All Branch Incharges in Head Office dealing Consent Management.
2. All Regional Officers in the field

Sub: Environmentally sound management of empty drums/barrels/containers contaminated with Hazardous chemicals/ Wastes-regarding.

Kindly refer to the subject noted above.

In this connection, please find enclosed herewith letter F. No.B-29016(SC)/1/15/HWMD/20934 dated 09.03.2016 received from Member Secretary, CPCB regarding Environmentally sound management of empty drums/ barrels/ containers contaminated with Hazardous chemicals/ Wastes for your information and compliance.

DA/As above.

Endst. No. HSPCB/HW/2016/ 19

A copy of the above is forwarded to the Sh. Sandeep Sharma, Jr. Programmer, HSPCB for uploading the F. No.B-29016(SC)/1/15/HWMD/20934 dated 09.03.2016 on the website of the Board information of all concerned for compliance please.

DA/As above.

Sr. EE - I (HQ)

For Member Secretary

Dated: 19/5/16

Sr. EE - I (HQ)

For Member Secretary

FJMS-2497
22/3/16

केन्द्रीय प्रदूषण नियंत्रण बोर्ड 48
CENTRAL POLLUTION CONTROL BOARD
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय भारत सरकार
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE GOVT. OF INDIA



SPEED POST

March 09, 2016

F.No.B-29016(SC)/1/15/HWMD/ 20934

To

The Member Secretary
Haryana Pollution Control Board
C-11, Sector-6
Panchkula
Haryana-134 109, Chandigarh

Sub: **Environmentally sound management of empty drums/barrels/containers contaminated with hazardous chemicals/wastes- regarding**

Sir,

You are aware that discarded drums/barrels/containers contaminated with hazardous wastes/chemicals have been categorized as "Hazardous Waste" stipulated at S. No. 33.3 in Schedule-I of the Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2008 notified under Environment (Protection) Act, 1986. These drums/barrels/containers contaminated with hazardous waste/chemicals have potential to fire/release toxic pollutants and contaminate soil/water bodies, if not handled, stored, transported and treated/disposed in an environmentally sound manner. Thus, these discarded barrels/drums/containers require to be managed in an environmentally sound manner in compliance with the provision of the said Rules.

CPCB has received a complaint regarding improper disposal/cleaning of the said discarded drums/barrels/containers by various industries in Uttar Pradesh. In order to assess the status of management of the said drums/barrels/containers, few nearby units representing various industrial sectors such as Textile, Automobiles, Paints, Pharmaceutical and Chemical, were inspected along with officials of Uttar Pradesh Pollution Control Board (UPPCB). The inspection report reveals that most of the inspected units did not provide correct information pertaining to generation of empty drums/barrels/containers/bags during their manufacturing process; only few have obtained authorisation under the Rules; improper storage and labelling of the said empty drums, and; selling of the same to traders/scrap dealers/kabadis or unauthorized party who do not have Consent and authorisation from the SPCB. The complied observations and recommendations in this regard is enclosed for ready reference. Thus, there is need to enforce provisions of Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2008, Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution) Act, 1981, as outlined in the attached complied report.

In view of above, you are requested to ensure that storage, generation, collection, transportation, transfer, sale, utilization, disposal, etc. of empty drums/barrels/containers/liners/bags contaminated with hazardous chemicals are carried out in compliance with the said Acts/Rules.

Yours faithfully,

(A. B. Akolkar)
Member Secretary

Encl.: As above

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Central Pollution Control Board

Report on Status of Management of chemical contaminated drums/barrels generated in various Industrial Sectors

Background

Industries use chemicals as raw material during manufacturing process of its production. Some of these chemicals are procured in drum/ barrels/bags. Upon use of such chemicals, the empty drums remain contaminated with such chemicals which may be hazardous in nature. Such discarded drums/barrels/containers contaminated with hazardous wastes/chemicals have been categorized as "Hazardous Waste" stipulated at S. No. 33.3 in Schedule-I of the Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2008, notified under Environment (Protection) Act, 1986. These drums/ barrels contaminated with hazardous waste/chemicals have potential to fire/release toxic pollutants and contaminate soil/water bodies, if not handled, stored, transported and treated/disposed in an environmentally sound manner. Thus, these discarded barrels/drums/containers require to be managed in an environmentally sound manner in compliance with the provision of the HWM Rules, 2008.

CPCB has assessed management of the said drums/barrels/containers in few units in Uttar Pradesh during Nov-Dec 2015, based on a complaint. The assessment was made in 11 industries covering sectors such as Textile, Automobiles, Paints, Pharmaceutical and Chemical through questionnaire and inspection.

Observations

Following are the observation w.r.t. management of chemical contaminated drums/barrels/containers;

- a) It was observed that most of the units did not provide correct information pertaining to generation of empty drums/barrels/containers/bags during their manufacturing process.
- b) Most of the residual chemicals in the empty drums/barrels/containers/bags are hazardous and thus most of the empty drums/barrels/containers/bags are hazardous wastes falling under the category no. 33.3 in schedule-I of the Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2008.
- c) Of the 11 units, only 04 units were having authorization for collection, reception, treatment, storage, transport and disposal of discarded drums/barrels/containers contaminated with hazardous wastes/chemicals

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from Uttar Pradesh Pollution Control Board, as required under the HWM Rules, 2008.

- d) The entire chemical contaminated empty drums/barrels/containers (either open or closed mouth), generated after emptying the chemicals, are being stored in open areas i.e. not under covered shed. Further, floor was not impervious with adequate slope and there was no provision for collection of leakages/run-off water, leakage/run-off collection pit, etc.
- e) There was no labelling on the chemical contaminated empty drums/barrels/containers.
- f) Of the 11 units, 08 units sells chemical contaminated empty drums/barrels/containers and chemical contaminated bags to traders/scrap dealers/kabadis or unauthorized party who do not have Consent to Establish/Operate or authorisation or CPCB's utilization approval as required under the Water (Prevention and Control of Pollution) Act, 1974/ Air (Prevention and Control of Pollution) Act, 1981/ HWM Rules, 2008 for handling/ transportation/ storage/ cleaning/ washing/utilization of chemical contaminated drums/barrels/containers/bags, as applicable.

Conclusions & Recommendations

Selling aforesaid chemical contaminated empty drums/barrels/containers/bags to unauthorized parties puts threat to the environment and human health as it may lead to safety issues to workers during handling the same as well as contamination of soil/surface water when wastewater or solvents or acids or other chemicals (generated when washed) are disposed on land/surface water bodies. Further, possibility of using these chemical contaminated empty drums/barrels/containers/bags as packaging material or fuel for burning even without washing cannot be ruled out, which endangers life of general public when used for packaging food grade material.

1. In view of above, the units generating chemical contaminated empty drums/barrels/containers /liners/bags shall be directed to comply with the following:
 - i. The units shall immediately stop selling/handling over of the chemically contaminated empty drums/barrels/containers/liners/bags to traders/scrap dealers/kabadis or unauthorized party.
 - ii. In compliance with provisions of the Water (Prevention and Control of Pollution) Act, 1974, Air (Prevention and Control of Pollution) Act, 1981 and Environment (Protection) Act, 1986, following shall be ensured for environmentally sound management of drums/barrels/containers contaminated with hazardous chemical/waste:

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(a) Captive Utilization:

In case the unit intends to clean the empty drums/barrels/containers contaminated with hazardous wastes/chemicals at its own facility, they should install requisite cleaning/washing facilities after obtaining requisite Consent to Establish from the concerned State Pollution Control Board/ Pollution Control Committee. The facilities shall only be operated after obtaining the following:

- Valid Consent to Operate under the Water (Prevention and Control of Pollution) Act, 1974/ Air (Prevention and Control of Pollution) Act, 1981.
- Authorization for generation, collection, transportation, storage and treatment/utilization of discarded drums/barrels/containers contaminated with hazardous wastes/chemicals (category no. 33.3 in Schedule-I of the HWM Rules, 2008).
- Approval from CPCB under Rule 11 of the HWM Rules, 2008 for utilization of the said empty drums/ barrels/ containers contaminated with hazardous wastes/chemicals.

(b) Sale or transfer or handing over of the discarded drums/barrels/containers contaminated with hazardous wastes/chemicals to Rules' compliant utilizers:

In case, the unit desires to utilize the discarded drums/barrels/containers contaminated with hazardous wastes/chemicals through a utilizer, it shall be ensured that such party also possess all of the aforesaid documents:

- Valid Consent to Establish/Operate under the Water (Prevention and Control of Pollution) Act, 1974 / Air (Prevention and Control of Pollution) Act, 1981 for washing/cleaning of drums/barrels/containers contaminated with hazardous wastes/chemicals.
 - Valid Authorization for collection, transportation, storage and treatment/utilization of discarded drums/barrels/containers contaminated with hazardous wastes/chemicals (category no. 33.3 in Schedule-I of the HWM Rules, 2008).
 - CPCB's approval under Rule 11 of the HWM Rules, 2008, for utilization of the said empty drums/barrels/containers contaminated with hazardous wastes/chemicals.
- iii. The units shall provide a separate earmarked storage shed of adequate size for the storage of the discarded drums/barrels/containers/liners contaminated with hazardous wastes/chemicals having impervious floor with adequate slope to collect spillage, if any to collection pit. The spillage from collection pit shall be transferred to ETP through pump.

- iv. All the units generating chemical contaminated empty drums/barrels/containers/liners/bags shall immediately obtain authorization under the Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2008, from the concerned State Pollution Control Board/ Pollution Control Committee for the generation and storage as well as treatment/utilization/ sale/ transfer or the like of the same etc. as the case may be.
 - v. Even if the empty drums/barrels/containers/liners/bags are not contaminated with hazardous wastes/chemicals, the same shall be handed over for cleaning/decontamination only to the units having valid Consent to Operate from the concerned State Pollution Control Board/ Pollution Control Committee under the Water (Prevention and Control of Pollution) Act, 1974 / Air (Prevention and Control of Pollution) Act, 1981.
 - vi. The discarded bags/liners contaminated with hazardous wastes/ chemicals shall be disposed at Captive or Common Hazardous Waste Treatment, Storage and Disposal Facility, as authorised by the concerned State Pollution Control Board/ Pollution Control Committee.
2. In the event of non-compliance of the above, financial penalty shall be levied by the concerned State Pollution Control Board/ Pollution Control Committee enforcing provision of the Rule 25(2) of the Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2008 in accordance with the guidelines on "Implementing Liabilities for Environmental Damages due to Handling & disposal of Hazardous Waste and Penalty" published by CPCB.