

A Profile on Waste Minimisation and Recycling in Chemical Process Industry[®]

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Summary

Expenditure on waste minimization is necessary because it gives productive returns as economic project when handled intelligently. Chemical process must take into account the feasibility of putting waste to use either as secondary source of raw material or as fuel for power generation. A waste audit helps in assessment of the performance efficiency of chemical process and waste reduction efforts. The judicial pronouncements and environmental regulations in India provided legal basis required for efforts to minimize wastes and put in place mandatory environmentally sound technologies for reuse/recycling of wastes. The zero discharge approach via waste minimization through reclamation, recovery, recycles and reuse is suggested. The strategy is reduction of toxicity, mobility and volume through appropriate technology. The selected technology options are discussed depending on nature of waste to be reduced, minimized and the type of contaminants it contains.

Essential elements to be considered for designing waste minimization program are human resources, likely barriers, assessing options, evaluation and approach along with cost implication. This is followed by plugging failure points by way of sampling and estimation of the wastes in terms of quality and quantity. Plugging points can be controlled by utilizing microprocessors developed to plug failure points, e.g. control of temperature, pH and acid/alkali addition to control neutralization, precipitation etc. Success of waste minimization program depends on training of the people involved. As a corollary, training program will have as its objective of reaching zero discharge waste, loss prevention at every step, methods for checking environmental obligations, awareness of risk points, damage control and safety during normal operations.

It is explained in this paper how the waste minimization saves costs, generates raw materials and at the same time protects the environment. Attempt is made to provide tips to 'leap-frog' especially, prioritization, vendor selection, predictive maintenance, efficiency tricks and designing as appropriate training approach.

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1. Introduction

Since independence and especially after liberalization in the economy, India has seen rise in the industrial production and market of goods and services (domestic and import/export). The share market index and GDP has also grown. While we can boast of increases in the production of goods and energy, it is also fact that we have encroached on natural resources, converting some part into unassimilated waste. Merchandise has increased not in proportion to the population, but several times higher, indicating a high degree of consumerism. Life expectancy is high which means that the needs per person have increased both in years and quantity. Adverse effects are visible in terms of deteriorating natural resources, environment and health. Efforts for waste minimisation are critically important and necessary to ameliorate the situation.

There is increase in the hazardous by-products and waste generation from the chemical process industry. This is evident from increased production of chemicals such as H₂SO₄, nitrogen, oxygen, ethylene, lime, ammonia NH₃, NaOH, chlorine, phosphoric acid, propylene, Na₂CO₃, HNO₃, ethylene dichloride, NH₄NO₃, urea, vinyl chloride, benzene, ethylbenzene, CO₂ etc. This is indicating an average growth in sectors like electrical goods, chemicals, pulp and paper, transport equipment, food, beverages, tobacco, mechanical engineering, metals, textiles, leather and general manufacturing involving processing of minerals and metals and chemicals and petrochemicals. Growth in organic chemicals is very high, and this is a source of unassimilated wastes. Chemicals meant for downstream usage result in cascading of wastes.

The “waste minimisation” can be phrased differently: for example, as waste reduction or waste strength reduction; application of clean technologies or green technologies or pollution prevention; environment-friendly and sound technologies producing low or no waste or zero discharge, (‘zero’ here meaning something you can hardly measure). The preference, naturally, will be reflected in the following order:

- No waste generation at all;
- If waste is generated, it is recycled (which means less need for fresh raw materials);
- Residual wastes will be reduced in volume and weight, and toxicity by treatment; and
- Disposal of treated residues should be so smooth that it does not adversely affect the recipient body (for example, discharge of treated effluent through an out fall diffuser).

The importance and urgency of the waste minimisation is widely accepted and needs no over emphasis. The environmental regulations and judicial pronouncements have not only

emphasized the need for waste minimisation but also provided regulatory regime and institutional mechanism.

Indian Law:The principles and provisions in the environmental laws are presented in the Table 1.

Table 1: Principles of environment law in India

#	Principle	Relevant Rules	Suggestions
1	The Source Reduction Principle – Generation of waste should be minimized in terms of quantity or potential to cause pollution	Rule 5(8)(ii)	An undertaking of this kind should be sought, not only at the time of grant of authorization but also at the time of renewal of authorization.
2	The Integrated Life Cycle Principle – Substances and products should be designed and managed in such a way that minimum environmental impact is caused during their generation, use, recovery and disposal	Under entry 6 and 7 of Form I, information on the product life cycle is sought	No provision in the rules to promote this principle, except for the one cited
3	The Precautionary Principle – Preventive measures are taken, considering the costs and benefits of action and inaction, when there is a scientific basis, even if limited, to believe that release into the environment of a substance, waste or energy is likely to cause harm to human health or the environment	No mention	Needs to be included
4	The Integrated Pollution Control Principle – The management of hazardous waste should be based on a strategy that takes into account the potential for cross-media and multi-media synergistic effects.	No mention	Needs to be mentioned, as compatibility of different wastes needs to be ensured in final disposal fields
5	The Standardization Principle – Standards need to be provided for the environmentally sound management of hazardous waste at all stages of their processing, treatment, disposal and recovery.	The rules in general seek to achieve this in some manner	
6	The Proximity Principle – The disposal of hazardous waste must take place as close as possible to its point of generation, recognizing that economically and environmentally sound management of hazardous waste will not be achieved if specialized facilities are located at a distance that is too far from the point of generation	No such provision	
7	The Precautionary and Polluter Pays Principles – The potential polluter must act to prevent pollution and those who cause pollution must pay for remedying the consequences of that pollution	Rule 16	Implementation of this principle is problematic
8	The Principle of Public Participation – At all stages, waste management options are considered in consultation with the public and the public has access to information concerning the management of hazardous waste	Rule 8(5)(6) which concerns public hearing for location and setting up of disposal sites	Needs to be included in some form while granting/renewing authorization, enabling the public especially to access the data base of the concerned authorities. No public consultation is envisaged in the export-import process.

The Supreme Court of India, order dated 14.10.2003

The Supreme Court of India while dealing with a Public Interest Litigation (Civil WP no. 657 of 1995) regarding management of hazardous waste has dealt with, among other things, institutional arrangements and policy framework required for waste minimization. A High Powered Committee under the Chairmanship of Prof. M.G.K. Menon was appointed by the Supreme Court and recommendations of the Committee were accepted by the Supreme Court and an elaborate order was passed by the Court which inter-alia contained action plan for promotion and enforcement of waste minimisation in India. The Supreme Court also went to the extent of appointing yet another Committee under the Chairmanship of Dr. G. Thyagrajan to monitor the implementation of the order and submit quarterly report of compliance to the court.

As per the official submissions made by the State Governments / State Pollution Control Boards before the MoEF/Menon Committee, there are 13011 no. of units generating hazardous waste in India (as on March, 2002). The total quantity of hazardous waste generated is reported as 4.4 million metric tons per year. The Maharashtra State accounted for highest quantity of hazardous waste generation (2.0 million tons per year) followed by Gujarat State (0.43 million tons per year).

The Supreme Court order dated 14.10.2003 in Writ Petition No.657/1995 has clearly prescribed that efforts are required to minimize hazardous waste in India by minimisation of the generation of hazardous waste in terms of quantity and its hazardousness. Further, disposal of waste generated should be as close as possible to the point of its generation and country must reduce and control transboundary movement of hazardous waste by ensuring India's commitment to the compliance of the objectives of the Basal Convention. The Supreme Court also agreed with conclusions arrived at, among other things, by the High Powered Committee as below:

- That the MoEF made no concerted or consistent efforts of a promotional, educational and co-coordinating nature and it is necessary that henceforth, this should not be lacking on the part of the Ministry.
- Eighty-nine sites were identified out of which 30 are notified. Out of 30, 11 common landfills are ready and operational (2 in Maharashtra, 1 in Andhra Pradesh and 8 in Gujarat). (This, in other words, implies that the proposals regarding 59 sites are not dealt with seriously, and the majority of the notified sites, i.e., 19, are not yet operational. Even the sites that are in operation are not all in accordance with the criteria set out in the approved manual.)
- Rule 21 of the 2003 amendment to the Hazardous Waste (M & H) Rules, 1989, in respect of environmentally sound technologies and standards for refining or recycling, should be implemented.

- SPCBs are not making efforts to inspect facilities and to bring pressure on the units to bring the handling of hazardous wastes in line with their granted authorisations (except in a few cases like Andhra Pradesh and Gujarat). About 80% of the country's waste is generated by the States of Maharashtra, Tamil Nadu, Andhra Pradesh and Gujarat.
- The Supreme Court set out an Action Plan with 29 activities prescribed: for example, amend the rules, issue closure directions, update inventories, empower CPCB for cross checking inventories, strengthen institutions like the MoEF, CPCB, SPCBs, PCC and research wings, etc. A Monitoring Committee was constituted with Dr G. Thyagarajan, Senior Secretary, COSTED, Chennai as Chairman and seven others.

It is believed that when all these directions in the court order are fully implemented, industry will find the proposal of waste minimisation and cleaner production more attractive.

2. Preparation for WM Program :

A) Critical elements

Today, raw wastewater is treated, but after treatment it is still wastewater. Hazardous waste is dealt with by incineration, sales or secured landfill, both as treatment and disposal. This is, however, akin to an 'out-of-sight, out-of-mind' strategy. In some places, pollutants are merely transferred from one media to another, at others; dilution is seen as the solution to pollution. This, however, cannot work for long. In fact, if hazardous waste is mixed with non-hazardous waste, the entire material becomes hazardous. Thus the only sustainable solution will come with waste minimisation aimed at zero discharge

Waste generation, due to the burden of its disposal, is costlier than efforts required for waste reclamation. Though this was not apparent to begin with, the people who have undertaken such work have found in the end that there is a substantial saving by reclamation and it also has a reasonably short payback period. While preparing our WM programme, our aims should be:

- Minimise the quantity of waste.
- Minimise the toxicity of waste.
- Minimise the expenditure on recovery process.
- Minimise the potential risk.
- Maximise saving on raw material cost.
- Maximise saving on waste disposal.

These six considerations in fact can be grouped in two, namely, waste related (first two) and cost related (last four). The matrix then looks like as shown in Table 2:

Table 2: Waste matrix

	Reduction of waste [R]	Cost for programme [C]
Small [S]	SR	SC
High [H]	HR	HC

The ideal will be SCHR i.e. small cost, high reduction, but sometimes we shall have to go by HCSR i.e., high cost, small reduction in a specific situation. Cost depends on the efficiency of the gadget that we are employing. Cost also depends on economies of scale. Add-on is always costlier. Further, capital costs and operating costs are generally inversely proportional, and at both the extremes, small decrease in one cost requires large increase in the other cost. The cost of production has many components, and these can be stated as follows in Table 3:

Table 3: Costs of production

Capital	Operating	Account heads
Land and building	Fuel	Depreciation
Utilities	Raw materials	Taxes
Production	Operation and maintenance	Interest
Waste treatment plant	Labour and Waste handling	

If one commences with pure raw materials and uses modern technologies/instrumentation then it results in less requirement of utilities, raw material, labour, work-up chemicals and even wastes. Total cost is thus an amalgamation of production direct cost, production indirect cost, waste treatment direct cost, and indirect external cost of people's health. If the last component is very high, WM is the only answer.

There are many and rather difficult uncertainties in the waste reduction programme particularly when it comes to estimating the costs. Some of them are:

- There is no record of waste generation per unit output.
- Industrial activity and product mix change as per market demands.
- Waste volume may reduce but its hazard level may not similarly reduce.
- Dilution may disperse the same amount of waste but large volume is difficult to handle.
- There are too many industrial unit operations and unit processes in series and change in one disturbs the detailed calculations made earlier for all other units that follow.
- Waste generation and possibility of its reduction are all process-specific; parallels are seldom prone to extrapolation.

- The process technology and products may change widely, especially in pharmaceuticals and pesticides where the demand changes per season or as per acquired immunity.
- Waste consistency is variable: it may be in solid, sludge or slurry form, or as a liquid or air pollutant.

Reactors and reactions:

In a chemical industry, the reactor holds the reactant raw materials and solvents and transforms them within a certain period. Whatever is generated here is in mixed form such as the product, mother liquor and waste. These are to be separated and then taken out separately. For running the reactor, some external utilities are required: the furnace, steam or a cooling jacket, etc. For running the reaction, some internal helping hand is required: for example, catalysts, work up chemicals, product washing water, etc. As a natural corollary, this creates two types of wastes, namely, process waste and utility waste. Our aim is to minimise these two wastes, which in turn means to minimise the requirements of:

- (1) Quantity of input chemicals.
- (2) Need for separation and purification.
- (3) Utility inputs.
- (4) Catalysts and work-up chemicals.

If (1) and (2) above are kept in check, there will automatically be less need of (3), and if (1), (2) and (3) are under check, there will be less need of (4). Thus the central aspect is the chemical reaction, indicated as (1) above. It takes place in one of the following three ways, or as a combination of these three ways, namely:

1. Raw materials A and B react and create a product as well as waste. Thus: $A+B \rightarrow \text{product} + \text{waste}$
2. Raw materials A and B react and create a product, as well as discarded product or by-product and waste. Thus: $A+B \rightarrow \text{product} + \text{by-product} + \text{waste}$
3. Raw materials A and B react and create a product, but impurities in these two raw materials (say x and y) either react among themselves or react with the other raw materials and create many types of waste. Thus: $(A + x) + (B + y) \rightarrow \text{product} + Ay + Bx + xy$. Which way the reaction will run is important. The essential point is correct design of the reaction and the reactor (which is the work of the chemist and the chemical engineer respectively).

It may be noted that there are two types of reactions, viz., reversible and irreversible. If one has a choice, it is better to adopt the irreversible option. This is because in a reversible

reaction, the raw material may change into a different product as time elapses in the reactor or if conditions change in the reactor like temperature, pressure or mixing. An irreversible reaction namely $A + B \rightarrow \text{product} + \text{waste}$ is much simpler because this waste can be controlled by selecting a proper feed ratio, adjusting it, keeping it in excess, adding some inert materials, changing temperature if endothermic, changing pressure if the reaction leads to a decrease in number of moles, and correctly distributing and mixing the material.

One way to avoid intermediates and by-products getting converted into waste is to examine whether one can carry intermediate separations of products as the reaction proceeds. This avoids conversion into wastes. Purer raw materials will avoid subsequent cross reactions and waste. It is preferred either to procure the raw material in pure form or else purification steps should be introduced before charging. Catalyst selection is very important. Heterogeneous rather than homogeneous catalysts are preferred as the latter are difficult to segregate and recycle. Thus better flow distribution, better heat transfer and instrumentation and introducing catalyst 'diluent' helps. A steady state reaction is desired and hence start-up and shutdown losses should be reduced. If care is taken of one, there is less need of taking care of the other.

Separations:

The separation process is very important in the chemical industry as it relates to working capacity, operating costs, and sources of waste. Synthesis precedes separation. Purification precedes or follows (or both) separation. If conversion is incomplete it results in waste, and if separation is incomplete, that too results in waste. A separation process, to begin with, essentially has a mixture of more than one material, which it has to transform into different, distinct, material streams. For achieving this, a separating agent is required. This agent is either in a form of energy or in the form of another set of materials. Where the mixed materials awaiting separation are of different densities (or relatively different volatilities), separation is easily accomplished by mechanical means (i.e., by applying energy in some form). Such examples are filtration, centrifugation, settling, floatation, etc., selection of which depends on the stage of the feed and the product at the time of separation. Proper pH is required to be maintained at all manufacturing stages.

B) Initial steps:

Waste audit and emission inventory

The first step towards reducing waste and emissions is to perform thorough waste audits and accurate emission inventories. A waste audit (WA) is conducted to characterise the waste streams generated by an industrial plant, while an emission inventory (EI) is performed to quantify the direct release of pollutants into the environment from the particular shop under

study. WA and EI are complementary tasks and both are vital to the development of strategies for prevention of pollution.

Preparatory steps

Most industries have only a small number of unit operations and unit processes. Going through these minutely should not be a difficult task. At least a preparatory drill can be initiated. It is only by trying different techniques and pursuing different technologies that the goal of WM can be achieved.

1. Examine whether the staff know enough to handle well the basic utilities and their operations: for example, the boiler, the de-mineralisation and water-softening plant, the cooling tower, water accounting and water budgeting, refrigeration, vacuum pump, ejector, turbines, mixer selections, uniformity of distribution, weighing instrumentation, indicators, flow-meters, etc.
2. Examine whether full documentation of process routes is available or make a list of where this is lacking.
3. Examine what solvents are in use, their properties, propriety of particular solvents or possible alternatives and present recovery method.
4. Assemble information on vendors offering not only chemical technologies, but also physical techniques (like ion-exchange, reverse osmosis, dialysis, etc.)
5. Examine catalysts that are used, what substitutes are available in the market, how good is the present recovery for prolonged use and whether an alternative will improve this.
6. Examine whether the treatment system serves only the last limited residuals. A large treatment plant in fact is a discredit if it is a means of absorbing the inefficiency of plant or process.
7. Make a list of the process residues in all the steps. For this, one requires knowledge of chemistry, access to mass spectroscopy and facility to identify species. Library and laboratory may need to be upgraded.
8. Attempt a technical assessment of the industry's present configuration and examine whether it will be beneficial to permit all the reactions in one reactor or to switch to more reactors in series i.e. to do different jobs in separate dedicated reactors. This also applies vice versa, i.e., whether the present series of reactors can be combined profitably and thereby reduce the number of stages.
9. Examine whether some of the raw materials can be procured with short notice and reserved tanks for them can be eliminated or minimised in view of the fact that increase in the number of tanks in the tank farm area results in increases in

handling of chemicals and more losses. This is known as the 'just-in-time' (JIT) principle.

10. Examine how many inorganics are used in the process steps, and whether these can be curtailed.
11. Attempt to develop new packing.
12. Examine whether a vacuum pump can be used instead of a stream jet.
13. Train the operators to turn off or shut down idle equipment so as to minimise start-ups and shut-downs by scheduling.
14. Drying design is a common operation. Check whether the design is optimum. For improving this, the following techniques will be useful:
 - a) Recirculate air.
 - b) Recirculate air, minimise in-leakage (improve baffling, seals, air-lock, etc.).
 - c) Recover organics from the purge stream.
 - d) Recover energy value from the purge stream.
 - e) Abate organics from the purge stream.

Fugitive loss control

To begin at the beginning, one has to keep a watch on losses. Operators generally lose sight of small losses, but collectively these create substantial problems. The possible sources for arresting losses are tabulated below (Table 4):

Table 4: Controlling fugitive losses

Activity	Possible routes of fugitives escaping
Unloading	<ul style="list-style-type: none"> • Time delay in fitting hose • Leaking hose or leaking hose connection • Draining of fill lines between changing tanks • Leaking container, valves, pump packing, piping, or dykes • Electrical failure • Using of hooks, puncturing the bags
Storage	<ul style="list-style-type: none"> • Tank overflowing • Malfunctioning overflow alarms, level controllers • Rusted corroded containers or beds • Not seen due to unclean house-keeping • Not seen due to poor or faulty illumination.
Transfer	<ul style="list-style-type: none"> • Holes/apertures in hand carts, trolleys • Hooked bags especially at lower level of the heap • Old residual chemicals at the bottom of shop floor service tank, too stale and drained to refill afresh.

Process	<ul style="list-style-type: none"> • Improperly operated process equipment • Improperly maintained process equipment • Process/product changed, but existing old equipment pressed in service, thus either too high or too low height of freeboard • No dyking for shop floor service tank • Sudden equipment/tank draining for cleaning at emergency maintenance • Uncollected off-specification raw materials • Uncollected off-specification products/by-products • Leaking container, valves, pump packing, piping, or dykes • Electrical failure
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Good operating practice

Many operators believe that modernisation either in process or hardware is the solution to all problems. While this may work outwell, it is also worthwhile to try afresh the existing arrangementsafter making necessary changes in operation, which may give gooddividends.Some experienced suggestions are:

1. Reactor charging:

- Feed solvent by gravity and not by pumping.
- Closed loop vapours should be recycled for pumping operation.
- Charge solids first and then solvents, sequentially.
- Lock the hopper before charging solids.
- Cut open the bags inside the reactor, or as near to it as possible.
- Pass vent through refrigerator. Condense solvents and recycle.
- Use solvent of low vapour pressure.

2. Reactor operation:

- Closed reactor is better or secure lid with good gasket and clamp.
- Improve seals on agitator (better still, replace agitator with jet nozzles).
- Sequentially add the reactants and reagents. For example, do not add all NaOH either at beginning or at the end. Add slowly, continuously, as reaction proceeds.
- Control gas purge rate with automatic flow control devices and not by manual throttling the valve.
- Check reactor mixer and blades.
- Collect excess reactants on the spot.
- Use minimum number of intermediate steps.
- Sampling should be automatic, without the need of having to open the lid off and on.

3. Reactor discharges:

- Discharge lines should be on an incline.
- Reduce reactor temperature before discharge.
- Do not push contents by pressure gas.

4. Reactor cleaning:

- Optimise the sequence.
- Maximise production runs.
- Minimise number of solvent rinses.
- Increase smoothness of vessel walls.
- Use high pressure rotary nozzles to reduce quantity of cleaning solvent.
- Replace volatile chlorinated solvents with low-volatile chlorinated solvents or better still, with non-volatile chlorinated solvents or even better, with non-volatile non-chlorinated solvents, or best with aqueous based detergents.
- Collect final rinse wash for reusing, as first pass at the next cleaning.
- Use plastic beads, wheat starch or sodium bi-carbonate with water.

5. Report:

- Send observation remarks, if any, to the boss immediately.
- Communicate alternatives which can be used, to the boss at the earliest.

Good maintenance practices

Like good operating procedures, good maintenance practices are also important. Many times these are lost sight of because those in charge are too busy with production. At best, corrective maintenance is followed, i.e., merely keeping the machines in running condition. In fact, the concept of preventive or predictive maintenance is far more effective. For this, one needs to first make a list of:

- All plant equipment and locations.
- Items which are critical to the process.
- Problem equipment.
- Past experience i.e., which equipment has a tendency to fail often.
- Overloading/under-capacity utilisation areas.
- Up-to-date maintenance manual of the vendor.

The common excuses one hears from O&M or process operators are: (1) 'The same has been going on in the plant since the time I joined.' (2) 'No time'. As corrective maintenance engages all the time of the staff, no preventive maintenance could be undertaken.' (This is a vicious circle.) (3) 'Importance was not known.' To overcome these obstacles, it is important that industry takes part in training activities.

C) Waste minimisation techniques

Purpose

The reader who has come this far certainly shows a desire to find ways of handling wastes; which is better than just depositing them with the operating agency, which is 'out of sight, out of mind.' Before one reaches zero pollution, one must have zero discharge via WM through reclamation, recovery, recycle, and reuse. The strategy adopted is reduction of toxicity, mobility and volume through appropriate technology. The technology selected naturally depends on the nature of waste one is interested in to reduce/minimise, and the type of contaminants it contains (see table 5).

Table 5: Break-up of contaminants

# Contaminants	Type break-up
1 Organic	<ul style="list-style-type: none">• Organic liquids, soils, sludge, sediments• Petroleum-contaminated soils, sludge, sediments,• Solvent contaminated soils-sludge-sediments• Rubber goods, tyre, belts, polymers, etc.
2 Inorganic	<ul style="list-style-type: none">• Metal-containing solutions• Metal-containing soils-sludge-sediments,• Slag, bottom ashes, fly ash, foundry sands,• Batteries, mercury-containing materials, etc.
3 Miscellaneous	<ul style="list-style-type: none">• Chemical tanks, demolition debris, transformers, ballasts etc.

Data management

Decision making relies heavily on consistent, timely and accurate data. The chain is data assembly > data interpretation > data use > decision > data for checking success of the decision. When recycling is being considered, collect data to address the following questions:

- 1) What type of recyclable material does the waste constitute?
- 2) What recycling process is used/can be usable?
- 3) Would the recovery process generate secondary hazardous waste, for example?
 - a) Spent materials (like catalyst, mother liquor).
 - b) Sludge listed in Schedule 1 or 2 of the Hazardous Wastes Rules.
 - c) sludge not so listed (non-hazardous).
 - d) By-products which fall in Schedule 1 or 2 of the Hazardous Wastes Rules.
 - e) By-products not so listed (non-hazardous).
 - f) Discarded products and (g) Scrap metals.

It will be worthwhile to try to recycle all the above seven kinds of wastes, but priority WM will be as listed at b and d above.

Waste reduction (WR) before waste minimisation (WM)

WR has to precede WM. It commences at the stage of procurement of raw materials and ends with using the waste as raw material. In this section, we concentrate on four aspects:

1. **Raw material control:** This includes not only the actual raw material reactants, but also the materials required for utilities, additives, work-up chemicals, water, washings, by-products, intermediate products, and catalysts. Waste also needs to be handled as carefully as the ready saleable product because if it is further contaminated by poor handling, it may lower the possibility of recovery value.
2. **Raw material stocks:** Larger the stocks means not only are more funds locked up, but the risk is also increased. This risk could be in potential accidents, fire hazards or explosion and it can also be a burden, if the accumulated material becomes unusable. The concept, therefore, is just-in-time (JIT), which means that the industry should develop such relations with the suppliers so as to get the material just at the time of charging the reactor.
3. **Process modification:** This is the heart of WR and WM efforts. This prevents waste at generation, removing any further problem of waste collection, segregation, recovery, sale, or exchange. Some modifications can be very simple while others may need highly modern technologies.
4. **Volume reduction:** This may be required either for better management and handling or as pretreatment of waste for increasing its fitness for a particular recovery technology. Both the aspects are good but the latter has real merit. Merely concentrating the waste so that more waste can be dumped away by one truck-trip outside, is not WR. But if concentrated, for example, by de-watering, and copper is recovered from the remaining sludge (as in the electro-plating industry), it is a WR practice.

WR techniques

For WR, chemical plants can employ the following techniques:

1. Substitution, by using less hazardous equipment. For example, heat transfer done through water rather than oil or high flash point chemicals or low toxicity solvents in place of halogenated ones.
2. Lowering impact by using the same chemicals but under conditions that are less hazardous, for instance, using vacuum to reduce the boiling point, or reducing temperature or pressure in a reactor, or dissolving the mass in safe solvents or preventing reactor runaway.

3. Maintaining adequate distance between different types of equipment in order to reduce hazards, for example, keeping remote controls and operator distant from the operations or strengthening the control rooms and corresponding tanks.

4. Using concentrated materials which will reduce feed quantities of dilute chemicals. This can offer advantages like reducing the size of continuous reactors or reducing the size of storage tanks. This in turn keeps the hazardous intermediates in check.

5. Setting up barricades or enclosures to isolate the equipment or sealing rooms of the warehouse, tank-farm, process-shops and plant engineering or shielding the vents on pollutants (air or wastewater). Placing remote and continuous monitors also will be useful, as also negative pressure in the reactor (as in an asbestos mill).

Selecting a WM technology

As a preparation for selecting a final WM programme, we should be acquainted with various technologies that are available. Before we take that step, we should have some understanding about the different types of waste. Wastes can be divided into the following categories: (a) Wastes containing mainly organic contaminants, (b) Wastes containing mainly inorganic contaminants and (c) Miscellaneous waste. These are further detailed as shown in table 6.

Table 6: Waste recycling technologies

Waste Type	Possible recycling technology
<i>a. Wastes containing mainly organic contaminants</i>	
Liquid organic solvent and liquid petroleum products	Distillation, energy recovery, decanting
Soils-sludge-sediments, either solvent-contaminated or petroleum-contaminated, or organic sludge	Energy recovery, decanting, thermal desorption, solvent extraction (and use as asphalt aggregate in case of petro-contaminated)
VOCs	In-situ vacuum extraction
Non-aqueous-phase liquids (NAPLs)	Pump and recover
Dissolved organics	Freeze-crystallisation
Propellant and explosives	Energy recovery, ingredient extraction, reuse and conversion to basic chemicals
Lead/acid battery cases	Energy recovery (ebonite or polyethylene), reuse as thermoplastic (polyethylene)
Rubber goods (tyres, belts)	Energy recovery, size reduction and reuse, thermolysis
Liquid monomers	Distillation, energy recovery
<i>b. Wastes containing mainly inorganic contaminants</i>	

Metal-containing solutions	Freeze crystallization, chemical precipitation, ion exchange, reverse osmosis, dialysis, evaporation, cementation, electro winning
Metal-containing soil, sludge, sediment or slag	Chemical leaching, vitrification, pyro metallurgical processing or use as construction material/raw material for cement
Abrasive blasting material, foundry sand	Use as construction material/raw material for cement, vitrification, physical separation.
Lead-acid battery internals, nickel-cadmium batteries.	Chemical leaching, pyro metallurgical processing, physical separation
<i>c. Miscellaneous waste</i>	
Scrap chemical tanks, pipes.	Decontamination and disassembly.
Nonmetal structures and demolition debris	Decontamination and disassembly, use as construction material
Wood debris.	Energy recovery.
Transformer and ballasts.	PCB flush and treat (electric), metal recovery(electrical).

Wastes minimisation strategies are presented below in table 7:

Table 7: Waste minimisation strategies

# Waste types	Possible recycle technology
1. Ash	Aggregate/construction uses, cement raw material, chemical leaching, solution processing, physical separation, pyro metallurgy, vitrification
2. Battery cases	Chemolysis, energy recovery, polymer re-extraction, reuse plastics and particulates, thermolysis
3. Battery metals	Chemical leaching, solution processing, physical separation, pyro metallurgy
4. Construction debris	Aggregate/construction uses, decontamination/disassembly, energy recovery
5. Firing range soil	Chemical leaching, solution processing, physical separation, pyro metallurgy
6. Foundry sand	Aggregate/construction uses, cement raw material, vitrification
7. Fuel/NAPL	Pump and recover
8. Inorganic-contaminated sediments	Chemical leaching/solution processing, pyro metallurgy, vitrification
9. Inorganic-contaminated soils & sludge	Chemical leaching/solution processing, pyro metallurgy, vitrification
10. Liquid organic solvents	Decanting, distillation, energy recovery
11 Liquid petroleum products	Decanting, distillation, energy recovery
12 Mercury contamination	Bio-reduction, chemical leaching, solution processing, mercury retorting, physical separation
13 Mercury metal	Mercury distillation

14 Metal containing slag	Aggregate/construction uses, cement raw material, Chemical leaching, solution processing, pyro metallurgy, vitrification
15 Metal containing solutions	Solution processing
16 Monomers	Distillation, energy recovery
17 Organic contaminated sediments	Decanting, energy recovery, solvent extraction, thermal desorption
18 Organics-contaminated solids and sludge	Decanting, energy recovery, solvent extraction, thermal desorption
19 Paint debris	Energy recovery, thermolysis
20 Propellants & explosives	Energetic material extraction and reuse, energy recovery
21 Shredded plastic	Energy recovery, thermolysis
22 Solid polymers	Aggregate/construction uses, chemolysis, energy recovery, polymer re-extraction, reuse plastics and particulates, thermolysis
23 Spent abrasive	Aggregate/construction uses, cement raw material, physical separation, vitrification
24 Tyres and belts	Energy recovery, reuse plastics and particulates, thermolysis
25 Transformers & ballasts	PCB-containing device processing
26 Vadose zone VOCs	Vacuum extraction

D) Recycling technologies

Waste recycling technologies are listed below:

- 1) Distillation
- 2) Energy recovery (general)
- 3) Energy recovery (cement kiln)
- 4) Thermal desorption
- 5) Solvent extraction
- 6) Freeze crystallisation.
- 7) Chemolysis
- 8) Thermolysis
- 9) Chemical precipitation.
- 10) Ion exchange
- 11) Liquid ion exchange (LIX)
- 12) Reverse osmosis (RO)
- 13) Diffusion dialysis (DD)
- 14) Electrolysis (ED)
- 15) Evaporation
- 16) Cement raw materials
- 17) Physical separation
- 18) Adsorption

3. Formulation of WM program

(A) Human resources

To a great extent, the success or failure of a waste minimisation programme depends on its driving force, which is provided by the team captain – the leader and motivator. His or her role being pivotal, their own conviction as regards WM or rather, zero discharge, is of paramount importance. A team of people, termed the Waste Minimisation Organisation (WMO) needs to be developed. To begin with, the WMO will have to prepare a White Paper on WM. This paper will have two components: (A) scope of the activity and (B) preparation required.

(B) Crossing Barriers

WM programme will initially meet with objections from all sides, though the degree may vary. It may be from the finance section citing paucity of funds, or from the purchase department that the new raw materials line cannot be developed quickly or from the quality control department that analysis methods for new raw materials or recycled waste are not available. The general engineering department will claim that neither space is available for relocation, service and utilities, nor is labour, and the environment section will say that the amended consent or authorisation is not yet obtained. Finally, the production group will insist that the proposed measures are bound to decrease output at least temporarily.

The barriers, however, will disappear once the higher echelons of management support the WM scheme, making it loud and clear that the WM programme will eventually reduce the risks and occupational hazards to the workers while simultaneously fulfilling the legal requirements. Some of the objections, however, may be genuine. Solutions therefore have to be kept in mind in advance.

(C) Assessing options

In an industry, there are a large variety of products, processes, unit operations, and dedicated reactors. It is not practical to take all of them simultaneously for deeper study. A sequential attempt is favoured and selection will be dictated by factors that may vary. The industry therefore has to decide:

- What wastes are of interest and their hierarchy (to fix the priority)?
- How to define waste reduction (to fix the objectives)?
- What factors affect the quantity of waste available for WR?
- Minimising which waste will get the industry more credit and from whom – SPCB, public or management?

Designing and implementing the WM programme is bound to be an uphill task. The likely hurdles will be:

- Where the cost of disposal is less than the cost of recycling, (and where the mode of disposal is accepted by authorities and not objected to by the public);
- Where the cost of raw materials, freshly procured from the supplier, is lesser than the cost of the proposed recycled material involved;
- Where the purity of raw materials, freshly procured from the supplier, is better than the quality of the proposed recycled material;
- Where the reclaimed material has no demand beyond the factory walls as there are no recycling or exchange centers;
- Where a lot of administrative paperwork is required for waste transfer for off-site recycling. This is cumbersome and time-consuming, more so if interstate transport is involved.

The management will want to know what is the recovery potential of the concerned waste. The broadly acceptable avenues are:

- Energy recovery from the concentrated organic liquid waste (for example, incineration heat recovery from organic liquids and oil);
- Recovery of materials from concentrated organic liquid waste (for example, distillation and recovery of waste solvents);
- Recovery of metals from industrial sludge and plating waste (for instance, recovery of metals such as chromium, copper, nickel, etc., from the spent bath).

(D) Evaluation

The WM programme that is finalised also needs to be evaluated. After implementing the WM programme, repeat the exercise whenever there are new situations. The findings of this

exerciseshould be compared with the earlier scenario. This is called trackingthe WM programme.The EPA at Illinois Information Centre has listed some significant attributes (table 8) one needs to evaluate:

Table 8: Evaluation of a WM programme

# Project element	Evaluation criteria
1 Management support	<ul style="list-style-type: none"> • Statement of support • Approval of project • Providing ideas/input • Praise and publicity of successes
2 Team aspects/programme initiation	<ul style="list-style-type: none"> • Employee enthusiasm and participation • Using skills from training • Supporting projects • Providing ideas
3 Understanding process	<ul style="list-style-type: none"> • Processes characterized • Flow diagram developed • All wastes and sources identified • Waste accounting system implemented
4 Project implementation	<ul style="list-style-type: none"> • Projects completed within budget • Projects completed on schedule • Waste reduction achieved • Cost savings attained • Raw material saving achieved • Product quality improved • Worker safety improved • Cost allocation system implemented
5 Continuing the programme	<ul style="list-style-type: none"> • Follow-up and review procedures established • Employees kept informed and involved • Pollution prevention team composition rotated
<p><i>(Source: "Pollution Prevention: A Guide to Program Implementation." Illinois Hazardous Waste Reduction Information Centre, 1993)</i></p>	

(E) Approaches

So far, we have attempted to make a list of all the possible unit operations for all the products reactor-wise. We have also suggested a number of alternatives for each waste. It is, however, clear that no industry can undertake minimisation of all the wastes at the same time, nor can all the options for the same waste be implemented at the same time. One has to prioritise. There are several ways of deciding priorities.

One approach is to look at the wastes and try to decide which one to take up first.

- The most precious waste: It may give better monetary returns for the reclamation efforts that are made: for instance, gold or silver plating waste.
- The most voluminous waste: it may offer economies of scale.
- The easiest waste: It may give sure success, which will be appreciated by the authorities.
- The most reusable waste: It may give better monetary returns: for example, solvent extracted and reused in the same reactor.
- The most hazardous waste: It will bring necessary relief to people, the environment and property.
- The most mal-odorous waste: It will enable industry to develop harmonious relations with people in the vicinity.
- The most repetitive utility waste: It may allow a continuous uninterrupted running and better monetary returns for the efforts made: for example, solvent extraction.

Another approach is to prioritise in terms of efficiency of technology.

- The most preferred option will be the one that will decrease the generation of hazardous waste at the source itself (source reduction).
- The next preferred option will be the one that will reclaim such materials that have a positive recyclable value (reuse, recovery, recycling).
- The next preferred option will be one that will treat the contaminants found in various plant discharges and emissions and make the environment congenial, but will not reclaim and recycle the waste.
- The least preferred option is the one that stores, transports or disposes the HW made in a manner that avoids leaks, fires and spills (storage and disposal).

One factor that must be kept in mind is that in case the technology has potential side-effects, it is better to select one that will create fewer problems even if the WM is reduced.

4 Implementation of WM program

A. Training

For successful implementation of the WM programme, it is necessary that all the people undertaking the programme are properly trained. Training includes refreshing the knowledge of

those who are to be associated with the programme. Training brings uniformity of approach, predictable behaviour and the possibility of common errors getting eliminated. The objective of a training programme is to (1) minimise occupational health hazards and errors; (2) to maximise safety; and (3) to instill good operating practices

B. Raw material control

Raw material is the main cause of adverse environmental impacts. Air pollution like stratosphere ozone depletion, low level ozone and fog, emission of VOC, global warming, acid rains, etc., are no longer a distant possibility, they are here and now. Our own incinerator emissions (like oxides of nitrogen, SO₂, CO, metals, acid gases and toxic dioxins) may as well add to it, unless we review our raw materials. It is worthwhile switching towards less hazardous raw material for many reasons: one, it lowers the risk to workers in the shop, office and colony; two, it produces less hazardous waste, in turn reducing the risk to transporter, environment and people; and three, it makes waste recovery easier. The search for raw materials is a continuous one as new materials are coming into the market every day, some with less toxicity.

C. Managing utilities

We now examine how waste and loss can be minimised in utilities.

Boiler efficiency tips

(A) Boiler performance

Boiler efficiency can be improved through proper maintenance and monitoring of operation. The seven tips presented here are guidelines for improving boiler efficiency. Conduct a flue gas analysis on the boiler every two months to test for fuel/air ratio setting and adjust air/fuel ratio to optimise efficiency. The air fuel ratio can be periodically adjusted to the recommended optimum values; however, a boiler with a wide operating range may require a control system to constantly adjust the air-fuel ratio.

A high flue gas temperature often reflects the existence of deposits and fouling on the fire and/or water side(s) of the boiler. The resulting loss in boiler efficiency can be estimated on the basis that 1% efficiency loss occurs with every 40 OF (19 OC) increase in stack temperature.

After an overhaul of the boiler, examine the tubes for cleanliness after thirty days of operation. The accumulated amount of soot will indicate the frequency of boiler tube cleaning. Check the burner head and orifice once a week and clean if necessary. Check all controls frequently and keep them clean and dry.

For water tube boilers burning coal or oil, blow the soot out once a day. It is estimated that operating the boilers without cleaning for a week can result in an efficiency reduction of as much as 8%, caused solely by soot accumulation. Purity of water used for steam generation is

extremely important. Impure water cannot be used as boiler feed. Water treatment prevents the formation of scales and sludge deposits on the internal surfaces of boilers. Scale formation severely retards the heat flow and causes overheating of metal parts.

(B) Combustion in oil-fired boiler

A boiler operating with too much excess air can result in unnecessary fuel consumption. Best performance can be obtained by the installation of an automatic oxygen trim system that will automatically adjust the combustion to changing conditions. Alternatively, the portable flue gas analyser can be used in a rigorous program of weekly boiler inspection and adjustment for boilers. The optimum amount of O₂ in the flue gas of an oil-fired boiler is 3.7%, which corresponds to 20% excess air.

Energy

Energy is required in an industry for various operations. In the chemical industry, it is needed to drive endothermic reactions, to carry out mass transfer operations, to provide optimum reaction conditions of temperature and pressure, to drive separation process, to power control and communication systems and to provide a satisfactory work environment. Energy requirements are of different types. Mechanical energy is used to compress gases for high pressure reactions; thermal energy is used to raise temperature of a reaction; and electrical energy is needed for electrolytic processes, for driving pumps or to illuminate works. Energy is derived from fuels. Fuel preference depends on its calorific value, ease of handling and distribution, reliability, by-products (ash, sulphur), and maintenance. Normal fuel preference, in descending order, is electricity, gas, hydrocarbon liquid, fuel oil and coal.

Pumps

Pumps are widely used for the transfer of liquids from one place to another, and from one level to another. Pumps are usually driven by electric motors but can also be driven by compressed air or hydraulics. There are many types of pumps in use in industry, among which (a) centrifugal pumps, used for transfer of large volumes; (b) metering pumps, used for precise delivery of liquids to a point of application and ensuring constant discharge, regardless of back-pressures in the lines; and (c) progressive cavity pumps or peristaltic pumps, used for delivery of very viscous materials. Measures to improve pump efficiency are (a) Shut down unnecessary pumps. (b) Restore internal clearances if performance changes significantly. (c) Trim or change impellers if head is larger than necessary. (d) Control by throttle instead of running wide open or bypassing the flow. (e) Replace oversized pumps. (f) Use multiple pumps instead of one large pump. (g) Use small booster pumps.

Fans

Fans provide the necessary energy input to pump air from one location to another while they overcome the resistance created by equipment and the duct distribution system. Factors that can reduce fan efficiency are: excessive static-pressure losses through poor duct configuration or

plugging duct leakage, improperly installed inlet cone causing excessive air recirculation, oversized fan and buildup of negative pressure. Reductions in exhaust airflows are usually obtained by adjustments of dampers in the duct. More efficient methods of volume control are: install inlet damper control, reduce the speed of the fan and provide variable speed control for the fan.

Air compressors

Air compressors often consume large amounts of electricity. There are two types of air compressors: reciprocating and screw compressors. Reciprocating compressors operate in a manner similar to that of an automobile engine – using a piston to compress the air. Screw compressors work by entraining the air between two rotating augers. The space between the augers becomes smaller as the air moves towards the outlet, thereby compressing the air. Screw type compressors, especially older models, use more energy than reciprocating compressors. This is especially true if the compressor is oversized because the screw compressor continues to rotate, whereas a reciprocating compressor requires no power during the unloaded state. Energy used by air compressors can be reduced by:

- Repairing air leaks.
- Reducing operating pressure.
- Recovering heat from compressor exhaust or cooling water.
- Using outside air.
- Installing low pressure blowers where applicable.

D Hardware and machinery

Waste increases when efficiency of process decreases. Efficiency of process decreases the effective agitation and mixing of solids, liquids, gases, catalysts and temperature during the process. Drying of solids is meant to get the material into solid form. The solids can be of different constituencies such as flakes, granules, crystals, powder, slabs or continuous sheets, depending on what is the degree of drying required to be done.

Mechanical Separation' is an extremely important operation in the manufacture of chemicals. One type is based on diffusional operation in a single phase (like gas absorption, humidification, distillation, leaching-extraction, drying of solids, membrane separation and crystallisation) while another is straightforward mechanical separation (especially seen at a large number of small scale industries). Equipment modifications should always be periodically considered as one may find that the downtime, chemical input, water cost, etc., are reduced and thereby waste gets minimised.

E. Process modification

Reactors are key elements where most of the undesired byproducts that will eventually make up the waste streams are created. In some cases changing process chemistry is feasible.

There are such undesirable side reactions that substantial avoidable waste is created. Such a situation makes the step of change in raw materials very attractive.

Catalysts lose their effectiveness during use but can be reused after undergoing a regeneration process. Careful control of the regeneration process can maximise the quality of the regenerated catalyst while minimising the damage caused to the catalyst during regeneration. Catalysts can sometimes be modified so that they can last longer between change outs, resulting in fewer waste-generation shutdowns for catalyst changeouts.

Heat exchangers can be a direct source of waste when high temperature causes the fluids they contain to form sludge which reduce efficiency. One way to reduce sludge formation is to reduce the temperatures used in heat exchangers. Excessively high temperatures are frequently used because of the availability of process steam at fixed pressures but these can be modified. Sludge build-up can also be minimised through the use of online cleaning techniques, scraped wall exchangers and non-corroding tubes. Anti-foul agents also prevent sludge build-up. An alternative to the shell and tube heat exchanger is the plate and frame separation equipment which minimizes routine waste, controls excursions in operating conditions and thus improves efficiency.

Distillation columns produce waste due to inefficiency in separating materials. Efficiency can be improved as follows:

- Increase the flux ratio, add a section to the column, retry/repack the column or improve feed distribution so as to increase column efficiency.
- Insulate or preheat the column feed to reduce the load on the reboiler. A higher boiler load results in higher temperature and more sludge generation.
- Reduce the pressure drop in the column which lowers the load on the reboiler.
- Vacuum distillation reduces reboiler requirement, which reduces sludge formation.

Changes in tray configurations or tower packing may prevent pollution from distillation processes. At one facility, the conventional packing in a distillation column was replaced with high-efficiency structured packing conversion resulting in more products available for sale and a halving of still bottoms sent for incineration.

F. Catalysts

A discussion on WM will be incomplete without understanding the role played by catalysts. Catalysts, in their simplest forms, were known to man by the mid-nineteenth century and have progressively improved over the years. Catalysts help hasten reactions and may help in increasing the conversion, thereby reducing the waste; but the catalyst itself creates an environmental problem when it comes out as spent material. Although we cannot do away with catalysts, controlling their use is in our hands.

5. Epilogue

There are thousands of chemicals today and every year more are being added for the use in the chemical process industry. Generation of waste is due to inefficient processing of raw material. Generation of waste is unavoidable. Treatment of waste so as to make it harmless and its disposal into the environment is conventional approach practiced for dealing with the waste not found suitable for further use. Disposal of such waste into the atmosphere, water bodies and land is cost intensive and can best be called as “reactive”. When wastes are disposed in the atmosphere, it results into mixing of different pollutants and formation of secondary pollutants due to photochemical reactions. Such pollutants are synergistically toxic to the environment. Waste disposal into the water body causes enrichment and bioaccumulation of toxic compounds in aquatic ecosystem.

Adverse impacts of waste disposal into the water bodies are well documented. Land filling of solid waste - whether municipal or industrial – is extensively practiced all over. Fear of failure of safety and sustainability of landfill is not unfounded. Standards and specifications stipulated for location, design, construction material to be used, method of construction, pretreatment of waste to be disposed, method of closure and post-closure monitoring of landfills are laid down in the environmental regulations. Ineffective regulatory regime and inconsistency in proper operation and maintenance has led to the leakages and subsequent damage to the environment and health. Where the land availability is scarce, the option of landfill is not desirable. Disposal of waste into the landfill is also loss of the opportunity cost of land. There are also costs involved in the decontamination and/or remediation of the ecosystem, which is adversely affected due to waste disposal. But given the state of affairs as exist, land disposal of waste is practical approach being followed today.

Minimisation of waste generation using application of low or no-waste technology (LNWT) and environmentally sound management of the waste generated should be the most preferred direction for the chemical process industry. ‘Precautionary principle’ and ‘sustainable development’ are well settled and emerged into the laws of governance in the country. This is also clear from articles 47, 48-A and 51-A(g) of our constitution and that these concepts are already implied in our environmental statues including the Environment Protection Act, 1986.

National Conservation Strategy and Policy Statement on Environment and Development (1992) and Policy Statement for Abatement of Pollution (1992) of the Government of India the Ministry of Environment and Forest has an expression of its commitment for reorienting policies and actions in unison with environmental perspective and promoting development and adoption of cleaner technology. However, there has been no specific policy and legislative direction particularly aimed at planning and implementation of waste minimisation programme. Precious, though little, efforts were made by the Union Ministry of

Environment and Forest in collaboration with National Productivity Council of India to set up waste minimisation circles for various industrial sectors. This has been the part of assistance under a bilateral programme where systematic efforts were made over a period of time to reduce / minimize waste generation by way of process modification, efficient use of energy, raw material modification etc. in small scale industrial units in various sectors such as electroplating, pulp and paper and metallurgical units. But more needs to be done now especially the application of Low or No Waste Technology (LNWT) and minimization of waste generation from the manufacturing processes in chemical industry.

It was for the first time in the country that specific pronouncement for waste minimisation came from the Supreme Court of India in its order dated October 14, 2003 [*in the matter of WP (C) no.657 of 1995 regarding management of hazardous waste*]. The Supreme Court observed that industrialization has had the effect of generation of huge quantities of hazardous wastes. Hazardous waste required adequate and proper control and handling. Efforts are required to be made to minimize it. The Supreme Court also observed that due to alarming situation is created by dumping of hazardous waste, its generation and serious and irreversible damage, as a result thereof, to the environment, flora and fauna, health of animals and human beings. Therefore, the petitioner approached the court under Article 32, complaining of violation of Article 14 and 21 of the Constitution of India.

Responding to the directions of the Supreme Court the Union Ministry of Environment and Forest overhauled legislations in 2003 and thereafter, thereby, bringing in mandate for environmentally sound management of hazardous waste and application of environmentally sound technologies for hazardous waste recycling and disposal. Specific provisions were made in the rules for steps to be taken, wherever feasible, for reduction and prevention in the waste generated or recycling or reuse and fulfillment of requirements regarding management in an environmentally sound manner of wastes.

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