

Sri G Ravi, IAS
Member Secretary
State Pollution Control Board
Hyderabad
Telangana

Dear Sir,

**Sub: Regulation of Emissions from DG sets operated in the State to improve the air quality
— Installing Retrofitted Emission Control (RECD) or shifting to gas generator**

Greetings from the Bulk Drug Manufacturers Association of India (BDMAI)!

We wish to bring to your kind attention that several of our member companies have approached the Association informing us that they have received notices from the Telangana Pollution Control Board directing them to take measures for controlling emissions from DG sets by installing Retrofitted Emission Control Devices (RECDs) or by shifting to gas-based generators, in accordance with the applicable guidelines and directions.

At the outset, we sincerely appreciate the efforts being undertaken by the Government of Telangana and the Telangana Pollution Control Board towards improving ambient air quality in the State. We also acknowledge the objectives of the National Clean Air Programme (NCAP) and the directions issued by the Hon'ble National Green Tribunal for controlling emissions from DG sets.

We fully support the objective of reducing air pollution and assure the Board that the bulk drug industry is committed to complying with applicable environmental standards. However, considering the practical difficulties being faced by the industry, particularly MSME units, we request the Board to kindly consider the following:

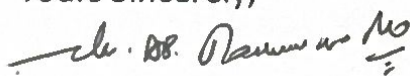
1. **Minimal operational requirement of DG sets:** The bulk drug manufacturing industry in Telangana is receiving regular grid power, and consequently, the requirement to operate DG sets for routine manufacturing operations has substantially reduced. DG sets are primarily maintained as standby arrangements and are operated only when required.
2. **Limited emissions:** Since DG sets are operated only for limited periods, particularly in units having reliable grid power supply, their actual operating hours for manufacturing activities are relatively low. Therefore, the cumulative emissions from such DG sets in these establishments are correspondingly limited.

3. **Impact of RECDs in Bulk Drug Industry:** While RECDs primarily reduce particulate emissions, their overall environmental benefit should be assessed considering the limited operating hours of standby/emergency DG sets in the bulk drug industry. As RECDs have limited impact on gaseous pollutants such as NO_x and CO₂, the additional emission reduction may not be commensurate with the technical, operational and maintenance costs of these systems
4. **Online monitoring of Generators:** As stated above, the usage of Generators is very minimal and hence connecting the Generators to Online Monitoring System of CPCB is practically not possible.
5. **Availability of gas for industrial applications:** One of the alternatives indicated in the directions is shifting to gas-based generators. However, the availability of gas for industrial applications has itself become a significant constraint. Consequently, shifting to gas-based generators may not be practically feasible for many industrial units at present.
6. **Financial difficulties faced by the bulk drug industry:** The bulk drug industry is presently facing considerable challenges on account of disruptions in international trade, supply chains and geopolitical developments, including the continuing uncertainties arising from the situation in West Asia. Several companies, particularly MSMEs, are facing pressure on their order bookings, margins and cash flows. In such circumstances, immediate implementation of additional capital-intensive measures would impose a significant financial burden on the industry.

Considering the above concerns of the industry, we earnestly request your good office to permit the industry operating the Generators in the present manner and issue suitable directions to the concerned Regional Offices accordingly.

We shall be grateful for your kind and favourable consideration of this request.

Thanking you,
Yours Sincerely,



Ch. A P Rameswara Rao
National President

