

**Comment 1**

16-01-07 3:56am

**Name: G M Ravi****City: Vijaywada****Organisation: Home****Country: India**

Comment

A2: "Project is based on the Waste Biomass Resources i.e. Rice Husk" How is the Rice Husk considered as waste when it is being sold in the Market at Good Rates (15500 Rs./ton as per the PDD) and people have been using it as fuel.

A2 :

1. Social well being: Any power project will lead to reduce the GAP in demand and supply and even coal based power plant would need transportation of coal. Similarly the employment will also be generated in the coal based plant, then what is the social well being added by the project. The husk is said to be transported from mills. So is it a mill waste or agro waste.

2. Environment well being: How will the local environment be improved by reduction in CO2 emission, the project will definitely emit CO2 due to the combustion of Rice Husk and Coal also.

3. Economic well being: In the previous para it is stated that the Rice husk will be transported from the Mills, but it is claimed to provide revenue to the suppliers and farmers, what is the correct status.

It is not clear as how the farmers will get revenue from it. It is not clear as in the absence of the project activity how will there not be any revenue to the farmer from Rice Husk. What is the present revenue level to the farmers from Rice Husk? And how will the project add up to the revenue level.

4. Technology: What advancement of the technology is being adopted? Who would provide what technical know how to the operation? IT is not explained with the current status of technology and proposed technology advancement.

As per the data provided the technology adopted seems to be a common one.

A.4.3 : The project is likely to use Coal, but the calculation of CO2 emission caused due to coal combustion are not properly supported and considered. Also in the monitoring plan proper monitoring of coal and rice husk sampling and quality assessment is not given properly.

B.2 &3 : It is claimed that the project activity will displace the grid generated activity but it is not explained as by consuming the Biomass how the existing users will not be starved of the biomass. It is not established as how the existing users of the biomass will not be forced to switch over to the fossile fuel.

Barrier Analysis:

The cost of Rice Husk is stated to have grown up from 500 Rs./Ton to 1550 Rs./Ton, which seems to be higher than coal prices also. Does it means that there are a number of existing users to the Rice Husk. Even then can it be categorized as waste biomass?

The project viability is based on the CER sales @10 Euros. Does it mean if the CER rates go down then the project proponent will switch over to the coal or fossil fuel.

The IRR of 9.9% without CDM is considered as fairly good rates, in Indian condition. This may improve substantially if the biomass prices are lower than claimed. Can then the barrier claimed will hold good. DOE should verify the correct economic scenario.

Technology Barrier:

- a) Does not seem to be a technology barrier, when the proponent has the option to use coal as fuel along with husk.
- b) Clinker formation phenomena is not explained. Deposition of Ash on tubes, is not a normal phenomena?
- c) ESP Blockage: not explained as how can this reduce the efficiency of the power generation? Will it not lead to higher pollution in Air?
- d) Ash disposal: without its proper disposal can the project be considered as sustainable one? Can this problem be considered as technology barrier?
- e) It is not explained as how can the primary Air Tubes get blocked due to rains at the time of feeding. Is the project proponent not having a proper storage facility to keep the Husk covered and dry. Is there no solution to it, or the other plants have also been facing such similar problems and have not found a technology solution to it? The detailed analysis of the claim to be checked by DOE.

Prevailing Practice:

It is learnt that Chhattisgarh has got the highest number of Rice Husk based power plants. There are already a few projects in the district Raigarh. A few projects are also registered in UNFCCC at Raigarh district.

Is then comparing the power generation with Coal as common practice proper?

Regulatory barrier shown in the PDD is not a barrier at all. Similarly the other barriers claimed are also do not seem to be barrier.

Environment Impacts: considered are not in accordance to the previous statement, where in the disposal of ash and emission from stack have been mentioned as barrier, than what will be the environment status. How the project proponent obtained environment clearance from the Govt., as per the applicable law.

It is not stated how the legal compliance shall be met.

The project proponent claims to collect the Biomass from 30 KM radius. Is there so much of rich husk available. As per the state government the production of rice in the district is not enough to meet the husk demand in that area. As per the state government total production of Paddy in the district Raigarh is 0.25 million tons only from which only 50,000 tons of rice husk, with this much of rice husk can the project get the surplus husk. When already there are a number of consumers of husk in the district. The DOE must ensure the actual surplus availability of waste rice husk

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<b>Organisation: INDIVIDUAL</b>	<b>Country: India</b>

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