

**Comment 1**

26-02-07 11:04am

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<b>Organisation: paryavaran mitra</b>	<b>Country: india</b>

## Comments

- Please make sure uninterrupted supply of biomass from local supplier.
- What is ultimate result of biomass residue in boiler? If it is burnt then will it not contribute to GHG? Solid waste will also be generated from it. Where it will be disposed off?
- In one unit of Arvind mill natural gas is available for boiler to switch over of fuel (AI & AC) But here in this PDD it is written that natural gas is not available for this unit though there is small distance between them. Then why natural gas option is not considered?

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**Comment 2**

06-03-07 6:54pm

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The Net Calorific Value considered for Coal is mentioned as 3600Kcal/kg (Pg. 13), at the same time NCVcoal considered for calculating the baseline emissions is 5000kcal/kg (Pg. 23&24). Both the values are indistinct and moreover the assumption for NCVcoal as 5000kcal/kg looks higher and not true value to be considered. Any source as such to prove the value is so much? Does the PP have any earlier records showing consumption and heat value of coal since it is a fuel switch project i.e., coal replaced by biomass?

How the PP obtain the figure of 21,840 MT of biomass per year. In my opinion it is not matching theoretically and looks high as per the assumptions mentioned in the section B.7.1 (i.e., considering 80% efficiency, 13TPH boiler capacity, Steam and feed water enthalpy and NCV of biomass). The basic conjecture to be measured is the operation hours of the plant in a year. Operation hours of the plant are not mentioned in the PDD. The figure 21,840MT is high even if you consider 365days of operation, which is wide of the mark in the case of biomass based plants since they highly depend on the monsoons and crops. How can a biomass based plant run throughout the whole year relying only on locally available seasonal biomass, in such case any fossil fuel being used in the plant for continuous operation? Justify this?

The additionality is not addressed as per the terms given in Attachment A of Appendix B. whole additionality has to be rephrase subsequently. How can lignite been chosen as an alternative. This alternative is not lucrative neither to the PP nor does it satisfy the sustainability issue by replacing baseline fuel (coal). Elimination of alternatives is not convincing and justifiable.

Project has no Barriers. Seem to be like the project doesn't have any other barrier other than the availability of biomass. Even that can be excluded, because the PP had contradicted that by considering the 365days of operating hours for emission reductions calculations, which means biomass is available throughout the year, hence no barrier. Justify?

Page 19 says "Please refer to Section D.2.1 for details", By referring so one cannot see any relevant explanation in section D.2

PP should consider project emissions though negligible. Address project emissions w.r.t. to the transport of emissions from

1. combustion of fossil fuels for transportation of biomass residues to the project plant
2. any Carbon dioxide emissions from on-site consumption of fossil fuels
3. Methane emissions from combustion of biomass residues

In case (1): this cannot be neglected because the biomass residues in absence of this project wouldn't be utilized. The project activity creates the transportation of biomass residues to the plant, wherein in absence of this project this would not have happened. Hence this should be included in the project boundary and as well to be considered for project emissions. Justify (2) and (3)

Address and mention leakage w.r.t to Attachment C (information on leakage in biomass project activities)