

Comment 1

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1) Biomass availability within 75 KM radius does not seem to be correct. The production of 1.87 Million tonnes of crop and 0.375 Million tonnes of Husk does not seem to be feasible. As per the Google Earth, the area is forest dominated. The district already has two registered CDM projects. Which would consume more than 0.3 Million tonnes rice husk.

Do to make sure the surplus availability by making the field visits from the rice mill in the area of 75 KM which produce surplus rice husk.

2) Rice husk is produced from the rice mills. Hence the survey should have provided with the names of the rice mills in 50 KM radius and the surplus husk produced during last 3 years and where it was disposed.

3) Technology barrier does not seem to be valid as many boilers are operating in India with rice husk without any difficulty.

4) Institutional barrier also does not seem to be valid as the biomass power plants are given higher tariff than the normal power plant. Even though they operate on freely available surplus biomass.

5) The higher prices of rice husk @1000 Rs/MT more than Coal, does not indicate the scarce availability.

6) The project should be able to generate more than 70% PLF, when coal is allowed and proposed to be used. Hence can the condition be resolved as barrier.

7) The grid emission factor is reported to be 0.81 for Western Region Grid.

8) Monitoring table cover coal as feed stock but the emission reduction does not reflect any coal consumption. Whereas it is reported that at least 5 to 10% of coal is required in rice husk power plant.

9) Monitoring plan does not cover the source of rice husk, if it is from surplus source or not. It is better that only the actual producers of rice husk who have surplus with them should be used to claim the credit.

10) As per prevailing law of Government of India considers the Environment Impact as significant hence the Environment Clearance is made mandatory for all the Power Plants, refer to the MOEF website.

11) Most of the biomass power plants in India are based on rice husk which used to be in surplus, as per the growing price of the same it is indicated that it may not be in surplus. Hence the present users of biomass must be covered in the study. If it is actually in surplus then the project is most economic itself. Thus is the baseline. There are practically no technology barrier in rice husk boiler in India