

MATTAASHTERA POLLUTION CONTROL BOARD
DRAFT PROPOSAL ON
ADMINISTRATIVE REFORMATION.

(1) CONSENT MANAGEMENT.

Sl. No.	ISSUES	EFFORTS MADE SO FAR	WHY NOT EFFECTIVE	FURTHER MEASURES REQUIRED	REMARKS
1	2	3	4	5	6
1.1	Delay in issue of receipt of application with fees	Instruction given to issue receipts	No serious thought is given by staff & also officers.	Computerisation	
1.2	(A) Acknowledgement in case of SSI units not covered under SCAP proposed industries is delayed. (B) Late submission of appli- cation to higher officer.	Acknowledgement to be given immediately. On MONDAY ROs/SROs should attend office compulsory. Instruction given for submission with or without queries to higher officer within three weeks.	Not followed This practice is not always followed Not followed strictly.	Supervision by higher officers Everyday 'Diary' to be maintained. Return submission compulsory All SROs/ROs must be in office on Monday or Friday. Strict action if consent application are retained without acknowledgement, entry receipt and also if kept beyond three weeks. Vigilance section to be estab- lished.	
1.3	Raising trifile queries & also directing the applicants only to specific consultants for preparing EIA/ETS schemes (This is important in case of consent to establishment).	Queries to be given in writing & reply called. Trifile queries can be resolved without delay in processing of application. List of consultants to be given to applicants.	Not followed Not followed	List to be procured by the officer. -do-	
1.4	Pressurising applicant for going to specific laboratory for monitoring/environment statement.	List of recognised labs. to be given given. Choice be left to the enterprenuer instead of orally suggesting names. -ETP Scheme/EIA not compul- sary to be made by Consultants.	Not followed & not informed to the enterprenuer.	Association to be involved for awareness.	
1.5	Consent issued to agents.	Only authorised person is allowed.	Not followed	-Action for default -Only authorised persons can be given consent. Otherwise strictly by post. -No visitors be allowed till 14.00 hrs.	
1.6	C.V.C. meeting -Lobbying for approval for consent to operate or establish	-Within a week consent should be issued. -Only duly authorised person can receive consents.	-Not followed -Not followed at times.	-Independent Security Guard & gate pass system to be introduced.	
1.7	-Consents issued to agents. Non-compliance of 15 years consent.	-Instructions issued wide order from Hon. Chairman.	-Interpretation of the order manipulated & ignorance of the	ROs/SROs to submit monthly report on compliance, and Action against default.	

Enterprise exploiters not follow

(2) CONSULTANCY SERVICES & MONITORING

FL.No.	ISSUES	EFFORTS MADE SO FAR	WHY NOT EFFECTIVE	FURTHER MEASURES REQUIRED	REMARKS
1.	Specific Consultants are preferred and recommended for expeditious processing.	List is to be displayed in office.	Nexus between officials & Consultants.	Industries association to be involved.	
2.	Threat is given, for refusal by letters or verbally.	Instructions given from time to time.	-No solid proof possible -No feed back or complaint received in writing.	Action against default.	
3.	Register is not maintained for Consultants.	Instructions given	Not followed.	---	
4.	List is not displayed for public information regarding Consultants.	Instructions given	Not followed	---	
5.	Consultants reports are not scrutinised if be of 'choice' by SRO/RO/HO officers.	It is incumbent on the concerned officers to properly scrutinised every report.	Nexus between Consultants and officers.	Quarterly review of all reports. Consultants reports to be computerised & reviewed using soft-ware.	
6.	Results of Consultants lab. are always within limits even if ERP is inadequate.	Comparison with Board's report is to be done. Board's reports only to be accepted for renewal prosecutions, case assessment, complaint investigations etc.	Neglected/over looked by SRO/RQ/HO officers.	---do---	
7.	Checks on the Consultants' staff facilities etc. by SRO/RO/HO officers.	Instructions given.	Not followed	Quarterly inspection of facilities. Review of the work done by the Consultants, while renewal of recognition.	

(3) PROSECUTION PROPOSALS

Sl.No.	ISSUES	EFFORTS MADE SO FAR	WHY NOT EFFECTIVE	FURTHER MEASURES REQUIRED	REMARKS
1.	Issue of Notices	Instructions given by letters/ circulars.	Not followed	Monitoring	
2.	Collection of sample ⁱⁿ a manner or from a location which is scientifically not proper.	Samples must be collected as per proper procedure and in presence of authorised representative of the unit.	Not followed	Flow based composite samples to be collected for prosecution purpose.	
3.	Threatening	Threat should not be given.	Not followed.	Such issues should be taken up through industries association.	
4.	Informing better results immediately (after notices are served) in writing by field staff.	Instructions given.	Nexus between officials & industry.	Action against default.	
5.	Results informed by Lab. staff of phone or personally.	This is incumbent on the staff to desist from such act.	This is not followed	Action against default.	
6.	Neglecting/over-lookng by field staff (SRO/RO/HD officers) in issuing Show Cause Notices to defaulting units.	Instructions given.	This is not followed	Monitoring & computerisation of Show Cause Notices.	
7.	Lack of interest in persuasion and follow-up in Court cases/ show cause notices served.	Instruction given	Not followed	Action against default.	

(4) LABORATORY (WATER/WASTE WATER)

Sl.No.	ISSUE	EFFORTS MADE SO FAR	WHY NOT EFFECTIVE	FURTHER MEASURES REQUIRED	REMARKS
1.0	<u>STATIONERY LABORATORY</u>				
1.1	Manipulation of results	No serious thought given so far and objective system is not evolved for lab. management.	Does not arise	Laboratory operation manual and code of practice is required.	Independent Guard agent necessary. Gate pass visitors to be intr.
1.2	Link between lab. staff & entrepreneur from whom samples are received.	- do -	- do -	- do -	
1.3	Variation in pH taken in field and lab.	- do -	pH measurement in field is not accurate enough. pH paper is used in field.	pH meters (Battery operated pen type) temp. probe be provided to each staff in field.	
1.4	Consumptions of glasswares, chemicals, filters, reagents.	Instruction given.	Proper monitoring of consumption of glasswares, chemicals, filters, reagents is not done.	Action against default.	
1.5	Maintenance and repairs of the equipment/instruments.	-Instructions given -Rate Contracts given to manufacturer's representatives for maintenance.	Not followed objectively.	In-house capability to be developed for minimum maintenance.	
2.0	<u>MOBILE LABORATORY</u> Van No.2				
2.1	Unscheduled visits to industries by lab. staff with lower staff from RO/SRO office <u>without knowledge of RO/SRO/SSO</u>	Instruction given.	- Not followed - Difficult to get solid proof of default. - Mobile van use is not optimised.	- Action against default - Mobile van must be used for environmental water/waste water studies and ETP performance studies.	
2.2	Visit of Lab-staff to industries <u>without staff from RO/SRO</u>	Instructions given.	- Not followed	- do -	

Sl.No. ISSUE	EFFORTS MADE SO FAR	WHY NOT EFFECTIVE	FURTHER MEASURES REQUIRED	REMARKS
1. Manipulation of results. 2. Link between lab. staff entrepreneurs.	-Field data sheets alongwith samples are received in which more no. of persons are involved. This increases objectivity & back calculation/ check is possible. -Samples are received only after authorisation from RO/SRO	System is effective.	- More facilities in terms of sampling kit and transport is required. - More lab./field staff needs training in air sampling & analysis.	
3. Field staff giving results to entrepreneur by doing and visits in industries.	Instruction given for not giving results without authentication by lab. analyst/Incharge.	It is not possible for lab. to know wherever known corrective steps are taken.	Reorientation of air sampling & analysis system is required for areas not served by Regional labs.	
4. Consumption of glasswares, filters, chemicals etc.	Strict monitoring system for consumption introduced newly.	System is effective	Does not arise.	
5. Maintenance and repair of equipments.	- In-house capacity built-up by training for HVS & SMK - for sophisticated services contract given.	- do -	- Intimation Engineer at F.O. level required for further improvement.	
6. <u>Mobile Laboratory Van No.1</u> - Field staff visiting industries in area where Van is placed for ambient monitoring.	Instructions given.	It is not possible for lab. Incharge to know wherever known corrective steps are taken.	- Industries Association be involved. - RO/SRO officers should also keep track of the van when it is in their area.	

own laboratory

(6) PROMOTIONS/POSTING/APPOINTMENTS/TRAINING :

Sl.No. ISSUE	EFFORTS MADE SO FAR	WHY NOT EFFECTIVE	FURTHER MEASURES REQUIRED	REMARKS
1. <u>PROMOTIONS</u>	Promotions procedures are followed as laid down in the Rules.	Does not exist	<ul style="list-style-type: none"> - Promotion (Departmental Promotion Committee) should be by selection. - Qualification/quality improvement facilities through higher education. 	
2. <u>POSTING/TRANSFER</u>	<ul style="list-style-type: none"> - Officers/staff working in one station for long period. - Officers/staff getting posting/transfer as per choice. 	It is done as per the requirement and in the interest of Board's work.	<ul style="list-style-type: none"> - Political interference/pressure on the management. 	Transfer policy to be framed.
3. <u>APPOINTMENTS</u>	Less qualified and at times inappropriate persons are appointed to meet the requirements.	Procedures are followed as laid down in the rules and requirements of the Board.	<ul style="list-style-type: none"> - Political interference - Court cases to flexibility & interpretation of rules. - Relaxation in the qualification/experience. 	Recruitment Rules to meet the requirements of Board.
4. <u>TRAINING.</u>	<ul style="list-style-type: none"> - Large number of staff still lacking training. 	<ul style="list-style-type: none"> - Instructions given not to avoid or delay training. 	<ul style="list-style-type: none"> - Selection is not objective due to lack of standard procedure/guidelines for training. 	<ul style="list-style-type: none"> - Training policy ^{(with rules) / procedure} is required. - Training package is must for new recruits. - Refresher training necessary.
	<ul style="list-style-type: none"> - Favoured persons are given more chances of training. 	<ul style="list-style-type: none"> - Corrective action taken whenever issue was brought to the notice. 	Does not exist	<ul style="list-style-type: none"> - Seniority/priority list of candidates for training be computerized for monitoring.