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AIIFA

INDUCTION FURNACE NEWSLETTER

VOL. No. XXII
ISSUE No. 11, Nov., 2022

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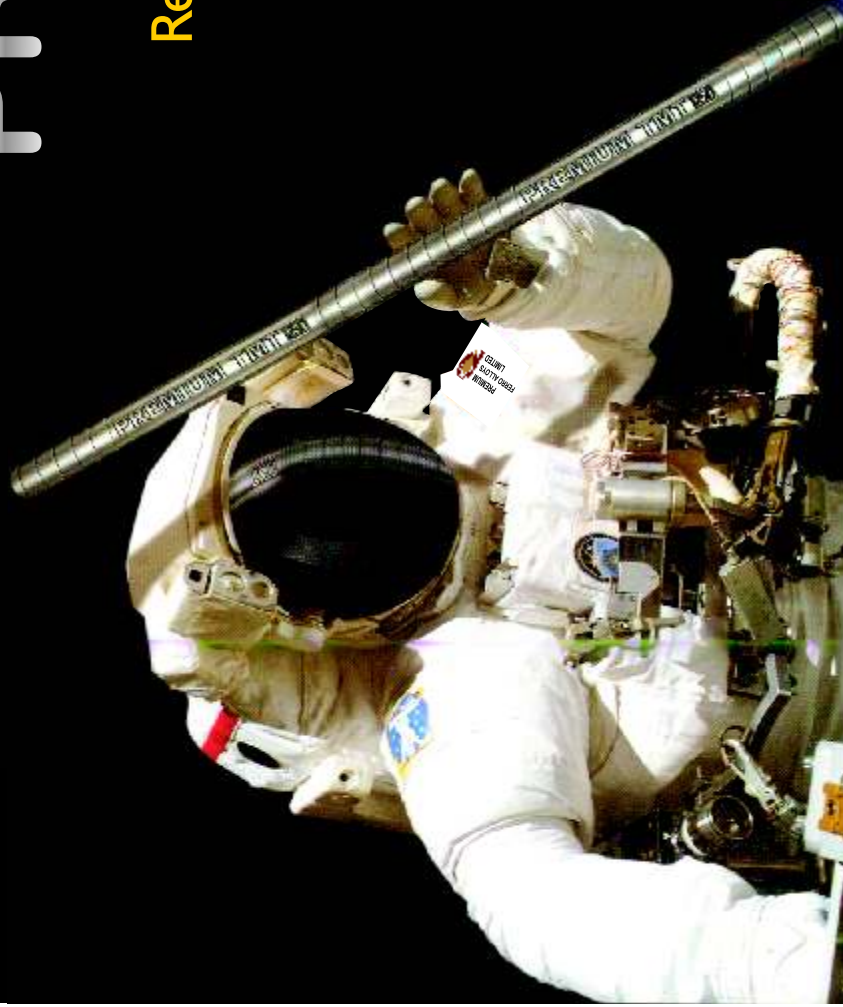
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Need for Efficiency Enhancement in Mini Steel Plant

Kamal Aggarwal
Hon. Sec. General, AIIFA

Induction Furnace Steel making Unit as Indian Secondary Steel Sector : Mini steel plants functioning in India are smaller in capacity and layout wise, producing steel and alloy steel from electric arc furnaces or induction furnaces preferably in small capacities using steel scrap, sponge iron, recycled scrap as raw material for charging in furnace. These steel making plants are termed as secondary steel producer as they do not use fossil fuel in steel making process like large scale integrated steel plants spread all over the country. The Indian steel industry has grown from being the tenth largest steel producer in the world in 1991 to emerging as the second largest, after China for last 3 years and hopefully maintain the same status and secondary steel sectors particularly induction furnace steel making route are continued functioning as big contributor in Indian steel scenario.

Mini steel plants differ from large or medium sized plant in running comparatively small capacity of the units where steel making done by

electricity whereas large scale integrated steel plants convert iron ore, coke, lime stone for production and manufacture iron & steel and finished and semi-finished products. Mini steel plants, run by owner or group of owners, are installed at any place keeping attention on infrastructure facilities like road connectivity, nearness to consuming sectors using their products and also nearness to the availability of raw material. Steel is at the core of a green economy where economic growth and environmental responsibility work hand in hand. Sustainable development of steel must meet the needs of the present without compromising the ability of future generations. Within this, a green economy delivers prosperity for all nations, wealthy and poor alike, while preserving and enhancing the planet's resources.

Production in mini steel plants is basically conversion of input to output utilizing all facilities involved in the production process. e.g.

Shop/ Unit	Input	Output
Melting Shop	Scrap, Scrap Substitute	Liquid Steel in various grades
Casting Unit	Liquid Steel	Billet, Bloom, Slab
Ingot Casting Stage	Liquid Steel	Different size Ingots
Billet/ Bloomill	Igot/ Cast Bloom/ Billet	Structural Product/ TMT Bars
Forging Shop	Ingot/ Bloom	Different sizes
Heat Treatment & Finishing Unit	Forged/ Rolled Products	Treatment against Requirements

Performance of Indian secondary steel sector in the Capacity of Mini Steel Plant - In the year 2020-21, this sector has produced 38.5 million tons of crude steel contributing about 37% of total crude steel production in the country. As finished steel, producing 40.88 million tons, this sector claims 42 % of country's finished steel production but in the area of long

products, this sector could achieve about 55% of total production. Production in melting furnace in secondary steel sector is the conversion process from solid charge to liquid steel by using electricity which at solidified stage shaped as ingot or concast products which are processed as forged or rolled product by way of production through hammer/ press

and rolling/ re-rolling mills. Production efficiency factors are closely related to optimization of resource allocation, usage and control which maximizes economic efficiency of the plant satisfying market i.e. customers leading to higher

opportunity costs. Since, highest value is spent at melting shop in the entire steel production route, it is necessary to pay attention on cost control and cost monitoring activities in this area.

Route wise & Zone wise Breakup of melting units & Production as Secondary Sector
(source: AIIFA)

Region	EAF (Nos)	Prodn ('000T)	% of Tot prodn	IF (Nos)	Prodn ('000T)	% of total IF Prodn	IF Working Capacity	% of Capability *
Eastern	170	9062	31.94	149	8120	25	11242	72
Western	236	18908	66.65	46	11262	34	14619	77
Northern	288	856	3.02	281	9063	28	9964	90
Southern	914	2541	8.96	858	5953	18	8671	66
Total	1608	28367	100	1334	32198			

○ It may be seen , the capability utilization of production varying from region to region as 72 to 90% level. Where Northern region performance is about 90%. (source: AIIFA)

Raw material availability and selling product in the market at price expectation appear to be difficult due to competitors activities as well as poor availability of raw materials. However, efficient activities in the entire conversion process to produce the output, with least amount of wastage maintaining essential quality is the only answer. In short, the efficiency in production is the plant's productivity which is concerned with producing products with the optimal combination of inputs to produce maximum output at minimum cost. Productive efficiency can also be termed as production efficiency which is the economic concept of producing the largest possible quality output from the available resources in the open Global market. For improving productivity, there is urgent need for modernization of production units up grading technology.

Aiming Towards Improving Efficiency in Plant : In the changing economic environment, global competition where the customer demands are changing continuously, Induction Furnace

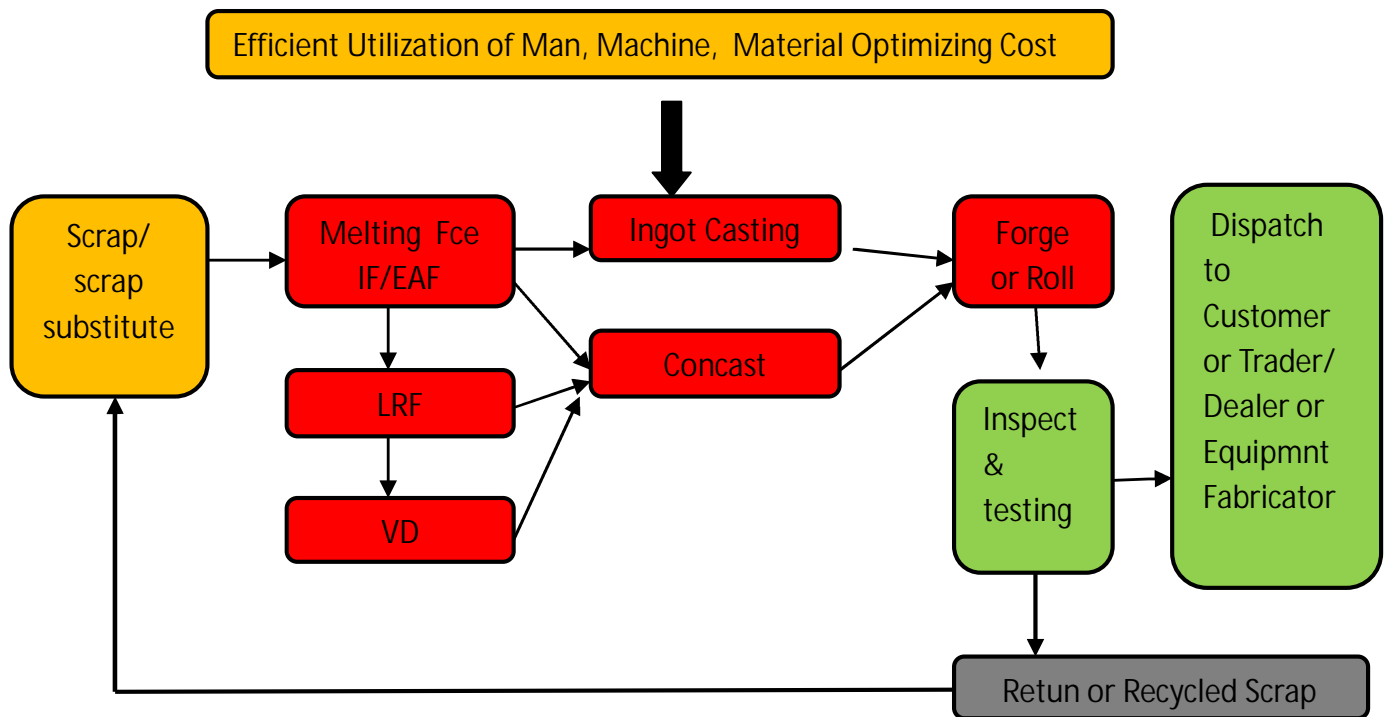
units have to concentrate focusing on cost reduction at each stage of production, efficiency and quality improvement, higher productivity and profitability. In the production, the resources (raw materials, humans, machines, equipment, etc.) are always limited. It is very important for the plants to produce cost effective final products i.e ingot form melt shop, forgings from forge shop and rolling from rolling/ rerolling units complying technical standards in a short lead time which can be achieved by minimized cost and higher effectiveness, and therefore, efficiency improving methods are needed. There are methods for analysis and improvement of production, monitoring performance indicators and cost.

The common goal of mini steel plants in performing in planned ways is the right balancing of production facilities at different processing stages to achieve target reducing product , process cost costs and providing a high quality steel products for their customers which will bring loyal customers tracking properly the supply chain system and all activities in proper and efficient ways. Effective use of of exiting resources maximize desired level of output. In terms of machine efficiency. Source of downtime

and low output and poor quality of products produced from equipments and repetition of problems in equipments should be quickly identified to determine if there are specific factors that repeatedly cause problems. Since buying new machinery may not be a realistic goal rather measuring measure real-time Operational Equipment Effectiveness on existing equipment machines, giving plant's actionable insight before investing in new machines.

Energy is an important cost factor in the entire steel industry and energy efficiency improvement is an important way to reduce these costs and to increase predictable cost saving especially volatility of high energy price. There are

a variety of opportunities available at individual plants having in IF plants, shaping by hot working and heat treatment facilities in the industry where opportunities exist to reduce energy consumption in a cost-effective manner from energy efficiency practices and use of energy-efficient technologies that can be implemented at the component, process, facility, and even at organizational levels which, together, help to improve plant structure, production process/ trends, energy consumption, product quality and greenhouse gas emissions from the equipments in steel production line. Some of the methods to track and improve production efficiency include:



Equipment Condition and Its Maintenance :

In the production process, equipments e.g. induction melting furnace, forging or rolling units and related auxiliary equipment play an important role for giving desired level of output up-keeping the health of equipments. Involved persons being responsible for equipment up-keeping should keep attention on equipment efficiency i.e. comparing performance from standard considering machine and human safety

with respect of maintenance, machine up-gradation, decision for repair (easy, cheapest as it is part of on-going process like preventive maintenance) or replacement (time taking & costly with loss of production). However, all materials/ equipments and system break down happen over time for which action needs to be taken maintaining inspection record on performance and efficiency, age of equipment/s, components, status etc for future decision.

Information may have to be collected from multiple sources by management for up-gradation or repair, refurbishing, revamping or replacement action considering cost.

Area-wise Performance Monitoring - The step in improving production efficiency is to track the performance and output, reason/s of shortfall or waste generation. As time goes on and effort is put into improving process.

Reduce Scrap/Rejection and Reworking - Another common way of measuring efficiency in a production facility is to calculate the overall equipment effectiveness, cause of product rejection / waste due to equipment or process deviating any standard.

Production Process & Products - For obvious reasons, improving the accuracy/speed of production process from each unit will aid in improving production efficiency. It is also important to understand that being able to trace data across all production locations and continuous inter-actions among the units about performance which will push for greater collaboration and knowledge sharing boosting efficiency tremendously through visibility.

Improve Inventory and Forecasting – Optimal inventory levels through supply chains makes inventory planning and management much easier and efficient for production in steel units. Tracking and measuring inventory levels will ensure to maintain just enough materials to begin production and avoid holding excess inventory or experiencing shortages. Anticipating demand and having materials on hand will avoid delays in production that could affect your production efficiency.

In order to improve processes, involved employees must be able to track and measure performance, any process deviation from standard though it is too difficult in the entire production process chain to have enough visibility within the process chain. A software

can help correlating easily in tracking and improving production by proper planning, scheduling and monitoring the process.

Produce Cleaner & Greener Steel I- Understanding the need of eco-friendly steel making, shaping and treating process and products to provide more than just peripheral attention to the economic implications of unusual changes in climate is still slow at many places. However, there is an increasing awareness in the steel making industries about the importance of eco-friendly production taking into account the economic costs and risks of climate change which is keys to making production process greener and cleaner by reducing energy usage. Climate change has emerged as the most pressing global challenge of the 21st century with an increasing understanding about the climate change transcending political boundaries.

It has been established that steel produced from electric induction furnaces in greener ways creates opportunities for making more efficient cleaner products by down stream processing units, equipments for different consuming sectors, with smaller ecological footprints in most cost-effective ways. Steel is not only recyclable but it also dissolves in high heat to produce high-quality steel.

Production Process Improvement – Strength of Secondary Steel Sector: Plants are having forging units like open-Die Hammer/ Press which use ingot as feed stock and also closed die forging facilities using billet/ bloom or forged products. They have also re-rolling units for final shaping as TMP bars, structural products like angle, channel, joist, shaped bar products etc.. For rolling or re-rolling units, they are to depend on integrated steel plants to get concast billet/ bloom but many mini steel plants have installed their own concast machines either bow type or vertical type machines. They are also making smaller size ingot usually termed as pencil ingots for use as raw material in their modernized rolling/ re-rolling mills.

Advantage of Secondary Steel Sectors – Secondary sectors produce mild and alloy steel products in different shape and size meeting National & Inter-national quality standards. These mini steel plants are decentralized, small, secondary units having electric steel making route which produce carbon steel (even competing with large scale integrated plants and alloy & special steels of various grades using scrap, sponge iron, Fe-alloys. Integrated steel plant, then again, is huge size to handle everything in one complex beginning from the transportation of raw materials for production of iron & steel. Comparatively there are two advantages of a mini steel plant over an integrated steel plant:

1. Plants utilize electricity in making steel either by EAF or IF consequently saving coking coal – Easy to control and coordinate all activities because of smallness of plant, Can be located anywhere.
2. Secondary steel producing units are located near consumer markets & based mainly on steel/iron scrap of different grades, mostly sourcing sponge iron, recycled scrap from nearby agencies. Mostly install facilities of forging, rolling at own complex or nearby production units.

Outlet of Common Products from Secondary Steel Units –

1. **Thermo-Mechanically Treated Bars, (TMT Bars)**, are Extra High Strength Reinforcing bars which replace any form of cold twisting, the technology of yesteryears. In this process, the steel TMT bars receive a short, intensive cooling as they pass through the specially resigned Tempcore Water Cooling System after the last Rolling Mill Stand. The sudden quenching converts the surface layer of the steel bar to a hardened structure. These bars have a great degree of

elasticity. The soft ferrite-pearlite core of the TMT bars gives them superior bendability, can be easily bent and moulded into any shape and used for a wide range of constructional purposes.

2. **Various Other Structural Products** refer to Angle (the most basic type of L-shaped hot rolled-formed steel by bending a single angle in a piece of steel, common type being equal 90 degree angle. The legs of the “L” can be equal or unequal in length), Steel channel (hot-rolled carbon steel made in a “C” shape, constructed using a vertical web and top and bottom horizontal flanges with inside radius corners, it is available in a wide range of sizes and thicknesses. The shape provides superior structural support, making it an ideal product for frames and braces used for machinery, enclosure, vehicle, building and structural support applications). Steel Girders (type of steel beams. Girders are collector beams, they are the main horizontal supports of a structure which support the smaller beams. The Girders are widely used around the world for the construction of bridges due to their various advantages which include improvement in efficiency of installation and providing sustainable solutions)
3. **Alloy Steel Products** (In the form of rolled, forged – open die press or hammer forgings, close die forgings, castings in different shapes), This sector is capable of producing Carbon Constructional & Alloy constructional, High Strength Low Alloy Grade steels, Ball Bearing, Tool & Die steels even highly critical grades with the help of secondary refining liquid steel like LRF (Ladle Refining Furnace), VD (Vacuum degassing), AOD (Argon oxygen decarburization) even at places ESR (Electro slag refining).

Recent developments such as liberalization and foreign direct investment (FDI) have given a boost to the secondary steel sector.

Key Challenges for survival- Improving production efficiency and quality in steel making, shaping and treatment units , optimizing cost are the key tenets of the mini steel plant producing steel, alloy & special steel industry in the present global competitive market . This establishes the principle, belief or doctrine among management, employees, workers, suppliers and customers. All connected in this process chain have realized production efficiency closely connected with business economy. These steel players also have realized improving productive efficiency by use of limited resources, high cost of input and high power, cost and product quality, all-out efforts for lowest possible waste/ rejection. All have to be serious in the area of eco-friendly production pollution issue, Best use of man, material, equipment, capital and technology, efficient use of all inputs.

Maximize Productivity - Effective and efficient way of running plant together pull best results maximizing productivity. Inefficient and ineffective way accomplish its overall goal, and the customer doesn't feel that the service is equated with the cost, then efficiency becomes largely irrelevant. The steel business should be speedy using optimal resources and struggle to be effective. For this reason, it is best to shoot for being effective first, and then work on bringing efficiency into practice.

Improving productivity starts with taking the initiative to look at how effective a plant, employee, or method is through performance reviews. Managers should make a point to regularly examine performance at all levels on a whole, and take into account the results that are being generated. Businesses and employees

often succumb to inefficiency because they don't look for a better way, or they lack the proper tools to be effective in the most efficient manner possible. Similarly manager or employee's level of effectiveness should improve. Govt. of India is providing necessary supports in all the needed areas which are beyond the control of management developing policy and strategies for encouragements of Secondary Steel Sectors.

Secondary Steel Sector in Capacity of Mini Steel Plant

Production : Ingot , Concast Bloom/ Billet

End Products as TMT Bars & Other Structural Products & Re-rolled Bars

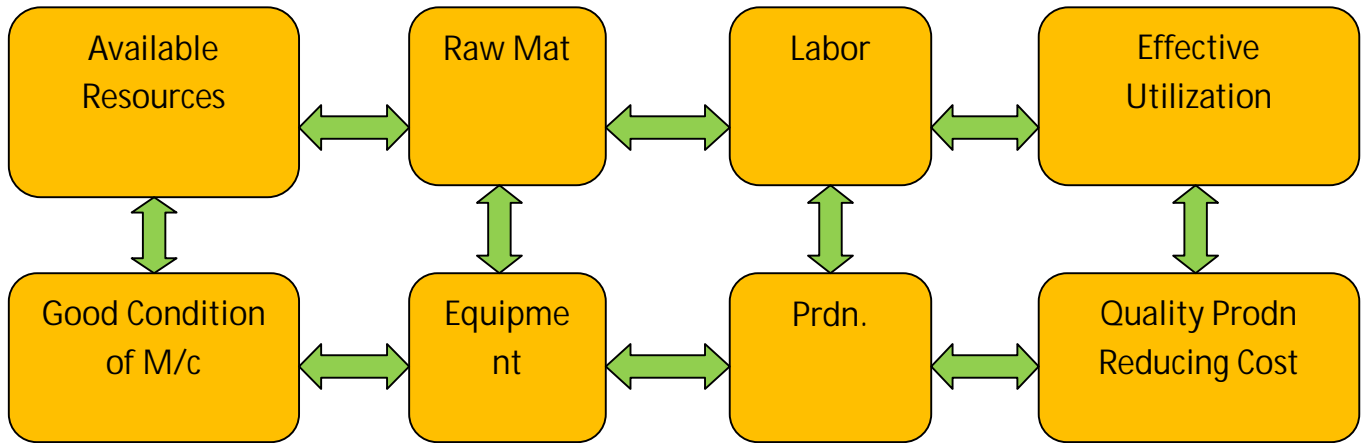
Forgings from Open Die Hammer/ Press, Close Die Forging/

Heat Treatment of Products, Inspection & Testing

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Mini steel plants can only be efficient as long as they are beating competitors, making profit. gaining importance from customers and winning at the end. However, as [new technology emerges](#) like secondary refining and other activities in line that allows them to strengthen quality, productivity reducing cost to make better and move in better ways, faster decisions to be taken to add secondary refining facilities. There will be a rising tide of what is accepted as “standard” within the steel industry preparing for setting up **Bench Mark Level** in activities. This is reflected as quality output going up despite the number of workers employed in steel industry decline.

All Activities are Inter-Related in Production



Conclusion : Efficiency and effectiveness in making steel from secondary sectors achieving the best output no matter the situation. Plants do not become more productive because of less demand in the market accordingly prepared plan in their budget or timelines grow. Unit becomes more productive because it focuses on doing

more production against customer requirement with their current resources. Whether the plan in budget is big or small, unit has to focus on productivity with care more about accomplishing everything they possibly can with what they currently have with efficient ways.



No.120017/27/GRAP/2021/CAQM/9709-9857

October 29, 2022

ORDER

Sub.: Implementation of Actions under Stage-III ('Severe' Air Quality) of revised Graded Response Action Plan in Delhi-NCR steps to be taken.

The Sub-Committee for invoking actions under the GRAP in its earlier meetings had invoked actions under Stage I and Stage II of the GRAP on October 5, 2022 and October 19, 2022 respectively.

The sub-Committee in its meeting held on October 29, 2022 further reviewed the air quality scenario in the region as well as the forecasts for meteorological conditions and air quality index of Delhi.

As per the forecast, the AQI in Delhi is likely to be in 'Severe' category in coming days owing to calm wind and stable atmospheric conditions. Therefore, in an effort to prevent further deterioration of the air quality, the sub-committee decided that **ALL actions** as envisaged **under Stage III of the GRAP - 'Severe' Air Quality (DELHI AQI ranging between 401-450)**, be implemented in right earnest by all the agencies concerned, with immediate effect in the NCR, **in addition to all action under Stage I and Stage II of the GRAP.**

These include:

1. Further intensify the frequency of mechanized / vacuum-based sweeping of roads.
2. Ensure daily water sprinkling along with use of dust suppressants, before peak traffic hours, on roads and right of ways including hotspots, heavy traffic corridors and proper disposal of the collected dust in designated sites/ landfills.
3. Further intensify public transport services. Introduce differential rates to encourage off peak travel.
4. Construction & Demolition activities:
 - (i). Enforce strict ban on construction and demolition activities in the entire NCR, except for the following categories of projects:
 - a) Railway services/Railway stations
 - b) Metro Rail Services including stations.
 - c) Airports and Inter State Bus Terminals.
 - d) National security/ defence related activities/ projects of national importance;
 - e) Hospitals/ health care facilities.
 - f) Linear public projects such as highways, roads, flyovers, over bridges, power transmission, pipelines etc.

- g) Sanitation projects like sewage treatment plants and water supply projects etc.;
- h) Ancillary activities specific to and supplementing above categories of projects.

Note: The above exemptions shall be further subject to strict compliance of the C&D Waste Management Rules, dust prevention/ control norms including compliance with the directions of the Commission issued from time to time in this regard.

(ii). Other than the projects exempted under (i) above, dust generating/ air pollution causing C&D activities to be strictly banned during this period shall include:

- Earthwork for excavation and filling including boring & drilling works.
- All structural construction works including fabrication and welding operations.
- Demolition works.
- Loading & unloading of construction materials anywhere within or outside the project sites.
- Transfer of raw materials either manually or through conveyor belts, including fly ash.
- Movement of vehicles on unpaved roads.
- Operation of batching plant.
- Laying of sewer line, waterline, drainage work and electric cabling by open trench system.
- Cutting and fixing of tiles, stones and other flooring materials.
- Grinding activities.
- Piling work.
- Water Proofing work.
- Road construction/ repair works including paving of sidewalks / pathways and central verges etc.

(iii). For all construction projects in NCR, non-polluting / non-dust generating activities such as plumbing works, interior decoration, electrical works and carpentry related works shall be permitted to be continued.

5. Industrial operations

(a) For industrial areas having PNG infrastructure and supply:

Strictly enforce closure / ban on such industries/ operations not running on fuels as in the standard list of approved fuels for NCR.

(b) For industrial areas not having PNG infrastructure and supply:

Regulate operations of such industries not using any of the fuels as per the standard list of approved fuels for NCR, to operate only for maximum 5 days a week as under (till 31.12.2022):

- i. Paper and pulp processing, distilleries and captive thermal power plants – to remain inoperative on Saturdays and Sundays.
- ii. Paddy / rice processing units – to remain inoperative on Mondays and Tuesdays.
- iii. Textile/ garments and apparels including dyeing processes – to remain inoperative on Wednesdays and Thursdays.

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- iv. Other industries not falling in the above noted categories – to remain inoperative on Fridays and Saturdays.
- (c) With effect from 01.01.2023, strictly enforce closure/ ban in the entire NCR, on such industries/ operations not running on fuels, as in the standard list of approved fuels for NCR.

Note: Milk & dairy units and those involved in manufacturing of life saving medical equipment / devices, drugs and medicines shall, however be exempted from the above restrictions.

6. Close brick kilns, hot mix plants which are not operating on fuels, as in the standard list of approved fuels for NCR.
7. Close down operations of stone crushers.
8. Ban / Close down mining and associated activities in the NCR.
9. State Governments in NCR/ GNCTD may impose restrictions on BS III petrol and BS IV diesel LMVs (4 wheelers).

Further, citizens may be urged to adhere to the citizen charter and assist in effective implementation of the GRAP measures aimed towards sustaining and improving the Air Quality in the region, as under:

- Choose a cleaner commute - share a ride to work or use public transport or walk or cycle.
- People, whose positions allow working from home, may work from home.
- Do not use coal and wood for heating purpose.
- Individual house owners may provide electric heaters (during winters) to security staff to avoid open burning.
- Combine errands and reduce trips. Walk to errands wherever possible.

All implementing agencies are advised that actions under **Stage 'I'** and **Stage 'II'** of the GRAP are further intensified and special drives are conducted for implementation of actions under **Stage 'III'**, particularly restrictions related to Construction & Demolition activities, stone crushers and mining and associated activities. Regulatory actions need to be taken on Industrial operations, brick kilns, hot mix plants using non-approved fuels.


(R. K. Agrawal)
Director

To,
Shri Arvind Nautiyal
Member Secretary
Commission for Air Quality Management
17th Floor, Jawahar Vyapar Bhawan,
(STC Building), Tolstoy Marg,
New Delhi – 110001

Sub: **Request for inclusion of construction activities in the list of exempted categories of projects**

Dear Sir,

The Commission for Air Quality Management in the National Capital Region and adjoining areas has issued **Direction No. 64** vide F. No. A-110018/01/2021-CAQM/8045-8071 dated 2nd June, 2022 in connection with permissible fuels for industrial applications in NCR.

Whereby as per point no.2 para (i) of the said direction, it has been stated that the industries operated in NCR shall be completely switch over to **PNG or Biomass** fuels latest by **30th September, 2022** (where PNG infrastructure/ supply is available) and the areas where such facilities is not available, they shall be permitted to **31st December, 2022** failing which such industries shall be closed down and not permitted to schedule their operations.

From the above, it is crystal clear that the objective of the above direction is to ensure that no damage is caused to the environment by the unit's operating in Delhi NCR region.

In this context, we would like to inform you that, MSME steel industries operating in Delhi, NCR region have strictly followed the guidelines as stipulated in Direction No 64 within the prescribed time limit and now they have operated their plant on cleanest fuel. Here it may be noted that a huge investment has been made by these industries to follow Direction No. 64.

Moreover, these steel industries are also very conscious and concerned about the environment and have already upgraded technology to overcome the environmental problem. They have installed most efficient Air Pollution Control devices like Wet Scrubbers/ De- Sulphuration Equipments in their unit to control the Air Emission. By installation of this Air Pollution Control equipment the smoke emission from the stack/Chimney is non-visible & negligent.

Regarding use of DG Set in steel making operation, it may kindly be noted that, only owing to interruption in the regular power supply, these units are compelled to resort to DG sets operation otherwise it is not economically viable for regular operation. In this connection, guidelines issued by CAQM vide **Direction No. 54** dated 8th February, 2022 will be strictly followed by MSME steel industries.

Now, CAQM vide its order dated 29th October, 2022, wherein it has been stated that the committee has reviewed the air quality scenario in the region and noted that in coming days, the Air Quality Index in Delhi, NCR region is likely to be in 'Severe' category, therefore, in order to prevent further deterioration of the air quality the sub-committee decided that ALL actions as envisaged under Stage III of the GRAP - 'Severe' Air Quality (DELHI AQI ranging between 401-450), be implemented in right earnest by all the agencies concerned, with immediate effect in the NCR, in addition to all action under Stage I and Stage II of the GRAP.

In light of the above order, construction and demolition activities are completely banned which directly affect the production activities of these MSME steel industries. Since the finished product produced by these industries are only consumed in construction activities which is a market for these industries. Banning of construction activities has adversely affected the production of such MSME industries and they are on the way to collapse/shutdown.

The question of concern is that, after making a huge investment by these MSME steel industries, they are not able to sell out their finished product and consequently their liability has also been increasing. If banning of construction activities shall be continued, there is no way for these industries except to stop their operation and shutdown the plant.

Since the fixed expenses like:

- Fixed Demand charges as per contractual demand load for the electricity
- 85% minimum charges for PNG as per required demand
- Salary and wages of Labour (at-least 200–250-man powers are engaged in one unit)
- Bank interest on terms loan and working capital etc.

shall be continued and it will be very difficult to bear this cost by the MSME Industries in the present scenario. It may kindly be noted that closing of units shall directly affects the government revenues and on employment also

Every year it has been observed that the landscape of Delhi and other northern region of the country like Haryana and Punjab turn apocalyptic due to the practice of stubble burning which is one of the major reasons behind the environmental hazards in these areas.

The burning of stubble or parali releases gases like Carbon Mono-oxide and Carbon Di-oxide which results in severe air pollution. Moreover, it has not only adverse effect on human health but also affect the quality of soil.

In order to protect the environment, the concerned state government should encourage the farmers by providing incentives to those farmers who do not burn stubble as well as also provide Crop Residue Management Machine so that it can be converted in to organic fertilisers by setting up decentralised composting.

Moreover, Construction and Demolition activities are carried out under the strict compliance of the C&D Waste Management Rules, dust prevention/control norms as per the direction of commission so that they do not cause damage to the environment.

Therefore, we would like to request you kindly consider construction activities under the exempted categories of projects specified in point no 4-sub para (i) and include construction activities in the list of exempted categories of projects so that MSME steel industry may be able to continue their production activities.

It will be highly appreciated, if you kindly convene a meeting at the earliest among the representatives of Builders Association, AIIFA, other leading association in NCR and CAQM to find out the possible ways to overcome this issue.

Hope our request is duly considered by you

Thanks & Regards

Kamal Aggarwal

Hon. Secretary General



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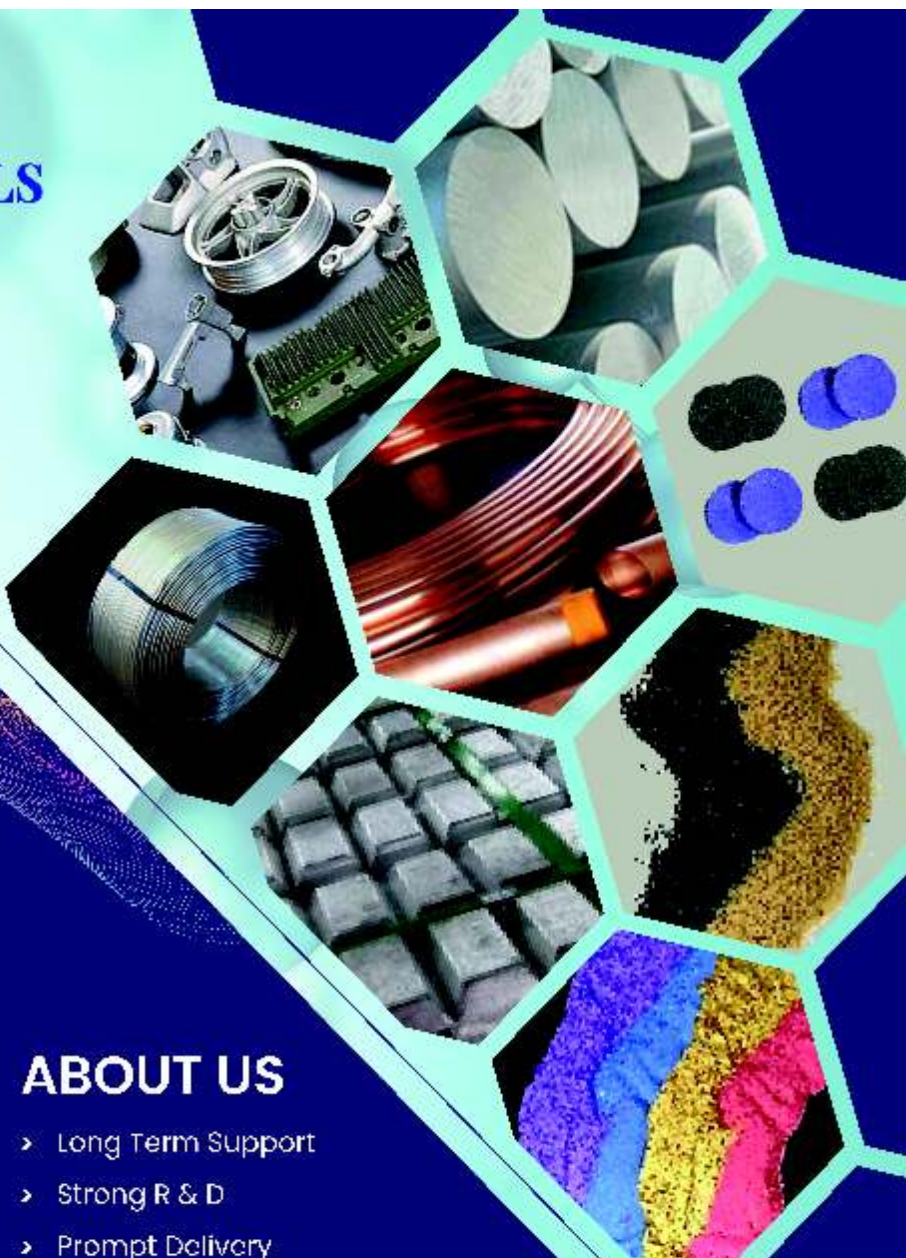


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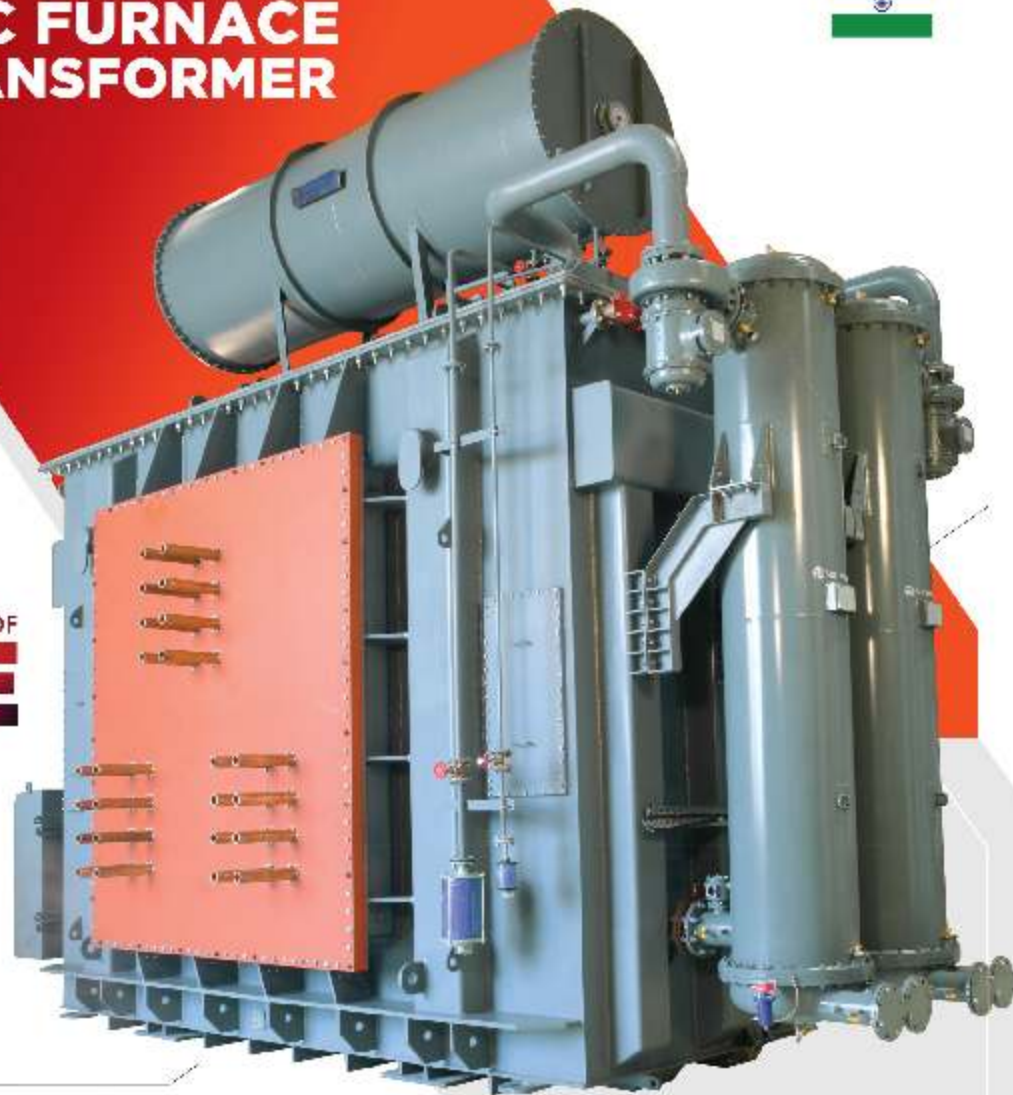


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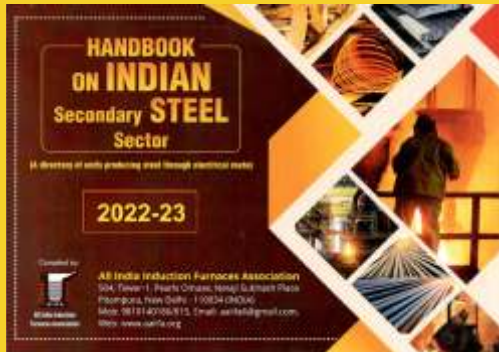
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