

Ref. No : ESTIL/MIN/29/2019
Date : 31st May"2019

To
The Director (Non-coal Mining),
IA Division,
Ministry of Environment, Forest & Climate Change,
Indira Paryavaran Bhavan,
Jorbagh Road, New Delhi – 110 003

Essar Steel India Limited

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Subject: Ghoraburhani - Sagasahi Iron Ore Block of by M/s Essar Steel India Limited with proposed production capacity of 7.16 Million TPA of Iron ore (ROM) along with Crushing & Screening Plant and Beneficiation Plant with capacity of 6.7 Million TPA, located at villages- Ghoraburhani, Sagasahi and Kalmang, Tehsil Koira, District Sundargarh, Odisha (MLA 139.165ha) – Reconsideration of Environmental clearance-**Submission of Revised EIA/EMP Report**

Ref:

1. Our proposal No. IA/OR/MIN/56152/2016 considered in Reconstituted EAC meeting conducted on 26.02.2018 under item no. 2.8
2. Minutes of the 28th Reconstituted REAC meeting held on 26.02.2018
3. Proposal reconsidered in the EAC meeting conducted on 21.02.2019 under item No.2.13
4. Minutes of the 2nd EAC meeting held on 21.02.2019.

Dear Sir,

The above mentioned project was considered for grant of Environmental clearance during the 28th meeting of the REAC-Non-coal mining, on 26.02.2018. The EAC advised for inclusion of additional details and asked to submit a revised EIA/EMP report. Revised EIA/EMP report along with additional details sought was uploaded. Subsequently, Additional details were sought regarding the status of the company under purview of National Company Law Act (NCLT), which was furnished along with compliance of CSIR-NEERI recommendations.

ESSAR STEEL INDIA LIMITED
AUTHORIZED SIGNATORY

The proposal was reconsidered in the 2nd meeting of EAC – Non-Coal Mining conducted on 21.02.2019. During the meeting, the EAC suggested to submit the revised EIA/EMP report incorporating details suggested in the Minutes of the meeting of the EAC. Accordingly, a revised EIA/EMP report incorporating the above details in line with generic structure of the EIA/EMP report as given in the EIA notification 2006 along with compliance of CSIR-NEERI recommendation is submitted.

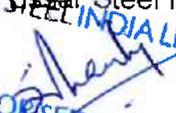
Point wise reply for the details sought by the Hon'ble Committee is enclosed as **Appendix-1**. We request you to consider our proposal and take necessary steps towards granting Environmental clearance for the above project.

Thank you.

Yours faithfully,

For Essar Steel India Ltd.

ESSAR STEEL INDIA LIMITED


AUTHORISED SIGNATORY
(Sabyasachi Mahapatra)
Authorized Signatory

Compliance of Minutes for 2nd EAC Meeting held during February 20-21, 2019

I.	Observation of EAC	Compliance
(i)	The EAC in its earlier meeting has also asked the detailed Action Plan on the issues raised during Public Hearing along with budgetary allocation and time line. However, the PP is unable to submit the same. The Committee again suggested PP to resubmit the Action Plan on the issues raised during Public Hearing along with budgetary allocation and time line.	Detailed Action Plan on the issues raised during Public Hearing along with budgetary allocation and time frame is incorporated in : Table 7.1, Chapter 7, page 7-3 to 7-7. The action plan along with the Capex, Opex and timeline of implementation is given in Chapter 7, page 7-8 to 7-9.
(ii)	The Committee noted that PP has submitted Form II wherein it is mentioned that there is no court case with this project. However, on perusal of record it is noted that there is one court case filed in Hon ^{ble} NGT vide OA No. 34/2018/EZ. The PP has misled the information which is very crucial in nature. The Committee suggested that explanation from PP/Consultant may be called.	There are three (03) court cases. Details of these cases along with their latest status have been provided at: Para 1.2.5 , Chapter 1, page 1-6 to 1-8. The status of the same are enclosed as Annexure-16A,B,C.
(iii)	PP mentioned the list of Flora and Fauna and their conservation plan only, however, the conservation plan is not yet approved by the CWLW. The Committee also noted that the conservation plan is not adequate and PP needs to resubmit the conservation plan along with budgetary provisions and time lines	The revised Wild life Conservation Plan has been recommended by DFO cum Wild life warden, Bonai to RCCF, Rourkela along with the budgetary provision (Letter of recommendation by DFO is enclosed as Annexure-10). Details of the conservation plan have been mentioned in Table 4.20. 4.21 & 4.22, Chapter 4, page 4-106 to 4-109.
(iv)	The Committee observed that there are no details submitted by the PP about carbon footprint. In this regard, PP needs to submit the same and also the details of noise and dust emission control in the crusher point	Carbon emission has been calculated and the details along with remedial measures like plantation , reducing fuel consumption, proper maintenance of machineries, transport roads, use of solar energy etc. has been in explained in para 7.8, Chapter - VII . However, Greenbelt will be developed in accordance with the condition 6 of NEERI which will reduce the carbon foot print. Dust control measures for Crusher detailed in Sec. 4.2.1 D), Chapter – 4, page 4-4 and noise control measures in Sec. 4.4.3, Chapter – 4, page 4-75

(v)	<p>The Committee observed that the proposed lease is surrounded by many other leases however, the PM_{2.5} and PM₁₀ values and other parameters are very low and the PP/consultants are incapable to explain the reasons. The Committee is of the view that the mine is surrounded by other leases; however, the predicted incremental concentration for the parameters are very less and suggested that PP needs to re-calculate the prediction for all the parameters and submit before the EAC for further deliberations. In view of the above PP needs to redo the modelling and submit the details with inputs on Air Quality modelling along with incremental ground level concentration due to mining and allied activities along with ore transportation on account of additional vehicles. The PP needs to submit the dust emission control strategies and its emission rate.</p>	<p>Ghoraburhani – Sagashi Mine is a green field project . Lower values may be attributed to the absence of mining or mineral transport activities in the nearby areas. The ambient air quality values have been cross verified and found to be almost in the same trend. The details are provided in Chapter 3, page 3-46 to 3-50</p> <p>The modelling for various parameters have been redone and the emission rate of Air Quality modelling along with incremental ground level concentration of fugitive and gaseous emissions due to mining and allied activities along with ore transportation on account of additional vehicles have been included and presented at:Chapter 4, page 4-10 to 4-41</p> <p>Dust emission control strategies are presented at: Chapter 4, page 4-1 to 4-10</p>
(vi)	<p>PP has not submitted detailed information about the dedicated corridor and transportation in the EIA/EMP report. PP need to submit the detailed information and the status of other FC approval required for mining and other allied activities.</p>	<p>In compliance to CSIR – NEERI beneficiated ore will be transported through dedicated slurry pipeline and thereby avoid road transportation from 4th year onwards. The route survey for this 27.884 km system has been completed and required statutory permissions are in process from competent authorities. Details presented in: Sec. 2.3.2.5, Chapter 2, page 2-35 to 2-36</p>
(vii)	<p>PP has not submitted the adequate details of total excavation w.r.t. mineral, OB, Inter-burden, Waste etc. PP needs to submit the details of the same.</p>	<p>Details of total excavation of mineral, OB, Inter-burden, Side-burden, Waste etc.is presented in:Table 2.3A & 2.3B, Chapter 2, page 2-8</p>

(viii)	The PP presented that the LOI is valid up to 27.03.2019 and mentioned that submitted the application for extension of LOI validity period, however, PP did not submit any valid proof for the submitted application. PP needs to submit the extension of validity letter to the Ministry.	Validity of Letter of Intent has been extended by Government of Odisha vide letter no MXIII (9 b) – 60 /15-2584, dated 19.03.2019 till 27.03.2021 (copy enclosed as Annexure-1b)
(ix)	The PP needs to submit how they will reduce the water consumption over the years. Target for rain-water harvesting and reduction in water use needs to be explored and submitted.	Various methods are proposed for reducing the water use such as water recycling in ETP to reuse the water, monitoring and controlling water used for domestic use, plantation of native species with low water requirement to reduce water used for greenbelt, use of additives towards effective dust suppression, employing zero discharge concept for beneficiation plant, implementation of paste technology to decrease quantity of fresh make-up water requirement. Elaborate details are given in Sec. 4.3.4, Chapter 4, page 4-62
(x)	PP needs to submit the details of the activities and budget earmarked for Corporate Environmental Responsibility (CER) which shall be as per Ministry's O.M No 2265/2017-IA. II (M) dated 01.05.2018 and its action plan on the activities proposed under CER.	The total costs of proposed CER programme implementation during 1- 10 years will be around Rs. 25 Crores (Rupees Twenty Five Crores only). Details of the activities and budget earmarked for Corporate Environmental Responsibility (CER) and its action plan presented in: Sec. 4.9.1, Chapter 4

(xi)	<p>The Committee noted that the Ministry of Mines, vide Notification No.S.O.2817 (E) dated 22nd November, 2010 had appointed a Commission of Inquiry consisting Justice M.B. Shah, retired Judge of the Supreme Court of India, for the purpose of making an inquiry in to mining of iron ore and manganese ore in contravention of the provision of various Statues and the rules and regulations issued there under, in various States including the State of Odisha. In view of Justice Shah Commission report (2013), the Ministry of Environment, Forest and Climate Change (MoEF&CC) has entrusted the work to CSIR-NEERI to conduct a Carrying Capacity Study. In this context, CSIRNEERI conducted the study encompassing collection of primary data for various environmental components (viz. air, noise, water, soil/land, biological and socioeconomic aspects), collection and analysis of environmental quality data by different mines in the region, modeling for transport scenario and infrastructure need assessment, and meetings/workshops with different stakeholders. NEERI has submitted the report along with the recommendations. The Committee noted that PP has not submitted the adequate action plan on the implementations of the recommendations of the report of carrying capacity study. The responses are vague and general in nature. In view of the above, the PP needs to resubmit the action plans/compliance on the recommendations of the report of carrying capacity study [Recommendations of carrying capacity study Report is at Annexure –III].</p>	<p>Revised action plan/compliance on the recommendations of the NEERI report of carrying capacity study is attached as Addendum to EIA/EMP Report after TOR compliance.</p>
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(xii)	<p>The Committee observed that as per the recommendations of NEERI report the State Government has to complete the SOTM within 5 years and as the EC capacity is >5 Million TPA, therefore, SOTM 1 may be applicable to this project and the Ore transport mode should be 100% by private railway siding or conveyor belt up to public railway siding or pipeline for captive mines and 70 % for non-captive mines. The Committee asks the PP to submit the development on the SOTM, if any, made by the Government of Odisha and actions taken by the PP.</p>	<p>The SOTM compliance proposal and developments have been detailed in SI. No. 7 of the NEERI compliance report attached as Addendum.</p>
(xiii)	<p>The PP needs to implement the recommendations of the report of carrying capacity study and necessary arrangement to be made to arrest “zero dust re-suspension”. The details needs to be submit by PP.</p>	<p>Vacuum cleaners will be deployed for cleaning of all mineral carrying roads inside ML area including road passing centrally through the Mining Lease and also for the proposed cement concrete road. Rs 1.5 Cr has been ear marked for procurement of 2 nos Vacuum cleaners for the mine as well as their Opex for first 5 years. It has been given in SI. No. 10 of the NEERI compliance report attached as Addendum. Besides, other mitigation measures such as maintenance of haul road by grading, regular water sprinkling engaging fixed and mobile water sprinkleretc. will also be carried out towards dust suppression. The details are elaborated in Para 4.2, Chapter-4.</p>
(xiv)	<p>The Committee observed that as per the recommendations of NEERI report and its condition no. 6, the PP needs to construct cement concrete road from mine entrance and exit to the main road with proper drainage system and green belt development within one year. The Committee deliberated the issues and is of the view that PP needs to complete the recommendations of the carrying capacity study report and accordingly action plan on the recommendations needs to be submitted.</p>	<p>A cement concrete road running through the Mining Lease which has divided Mining into Pit 1 and Pit 2.This road will be connected to both Pit 1 and Pit 2 through a 9 m wide cement concrete Road, which will serve as two way movement of vehicle. This will be constructed within 1 month on execution of Mining Lease and start of activity. The approx. length of this connecting pucca road will be 300m inside the mines. Besides drainage channel will be made on either side of concrete road from the mine to Kalmang and green belt plantation will be developed and maintained. Its details are given in SI. No. 6 of the NEERI compliance report attached as Addendum.</p>
(xv)	<p>The Committee in earlier meeting noted that the analysis w.r.t. surface water samples were wrongly reported, may be laboratory error; The Consultant has not done any root cause analysis. The same problem exists now also. The Committee suggested that the Consultant may be warned again and request</p>	<ul style="list-style-type: none"> • Consultant humbly wants to state that subsequent to 28th meeting of Reconstituted committee of EAC – Non-Coal Mining on 26.02.2018, they had received a letter from MoEF&CC dated Letter No. J-11015/192/2016-IA.II(M) dated 24.04.2018. Point No.8, of the letter stated that ‘<i>Analysis w.r.t. surface</i>

	<p>QCI/NABET to take necessary action.</p>	<p><i>water samples is wrongly reported, may be laboratory error; The Consultant has not done any root cause analysis’.</i></p> <ul style="list-style-type: none"> • Subsequent to this Root cause analysis was done and reply of Consultant along with root caue analysis was submitted to MoEF&CC, vide letter dated 08.05.2018. <p>A letter from NABET has also been received by Consultant, regarding the same on June 1st, 2018 and the reply was submitted to NABET also. Subsequently on July 13th 2018, they received a letter from NABET regarding the response of the accreditation committee which asked Consultant to ensure that no such lapses occur.</p> <ul style="list-style-type: none"> • Besides, based on the root cause analysis, the reason for variation in surface water quality was explained along with the other additional details sought by the committee in the covering letter which was attached with the Revised EIA/EMP report & in the presentation made to the Hon’ble EAC, non-coal mining on February 21st, 2019. • Hence, we kindly request you to acknowledge the root cause analysis and the reasons explained in the same.
(xvi)	<p>The Committee noted that the Consultant has not prepared the EIA/EMP report as per Appendix III (Generic Structure of Environmental Impact Assessment Document) of EIA Notification, 2006. The report should contain 12 chapters whereas PP has submitted only 11 Chapters with different titles other than mentioned Appendix in the EIA/EMP Report. In this context Consultant needs to revise the EIA EMP report as per Appendix III of EIA Notification, 2006 and resubmit the same before EAC.</p>	<p>The EIA/EMP report has been revised as per the Generic Structure guidelines of EIA Notification and also incorporating the observations of the EAC. The revised EIA/EMP report is re-submitted for the needful.</p>

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