



सत्यमेव जयते

भारत सरकार
GOVERNMENT OF INDIA
पर्यावरण एवं वन मंत्रालय
MINISTRY OF ENVIRONMENT & FORESTS

SPEED POST

क्षेत्रीय कार्यालय, पश्चिम- क्षेत्र,
Regional Office, Western Region,
"केन्द्रीय पर्यावरण भवन"

"Kendriya Paryavaran Bhavan"

लिन्क रोड नं०-3/Link Road No. 3

E-5, रविशंकर नगर/Ravi Shankar Nagar,

भोपाल (म०प्र०)/Bhopal-462016 (M.P.)

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दिनांक : 17.02.2017

20

क्रमांक: 3-36/2014(ENV)/086

प्रति,

श्री एम. के. सिंह

संयुक्त सचिव

पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय,

इंदिरा पर्यावरण भवन,

जोर बाग रोड, अलीगंज,

नई दिल्ली - 110003



विषय: Certified compliance Report for Ranavav Lime stone mine of M/s saurashtra chemicals division of Nirma Ltd, Porbandar, Gujarat.

संदर्भ: Ministry's letter no J-11015/1227/2007-IA-II (M) dated 17.09.2014

महोदया,

मंत्रालय के उपरोक्त संदर्भित पत्रांकों के संदर्भ में उक्त परियोजनाओं को पर्यावरणीय दृष्टिकोण से अनुमति देते समय अनुबद्ध शर्तों के अनुपालन एवं certification of compliance के निर्देशानुसार, अनुवीक्षण प्रतिवेदन (मॉनिटरिंग रिपोर्ट) एतद् द्वारा संलग्न कर प्रेषित है।

भवदीय

Sel-

(बी.बी. बर्मन)

सलाहकार

संलग्न: उपरोक्तानुसार

प्रतिलिपि:

1. श्रीमति रीता खन्ना, निदेशक, (अनुवीक्षण सैल), पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय, इंदिरा पर्यावरण भवन, जोर बाग रोड, अलीगंज, नई दिल्ली - 110003 की ओर सूचनार्थ एवं आवश्यक कार्यवाही हेतु।

✓ 2- M/s Saurashtra chemicals Ltd. Birla Sagar, Porbandar- 360 576, Gujarat.

वि. वि. बर्मन

(बी.बी. बर्मन)

सलाहकार

**Monitoring the Implementation of Environmental Safeguards
Ministry of Environment & Forest & Climate Change**

Western Region, Regional Office, Bhopal

MONITORING REPORT

PART - I

DATA SHEET

1.	Project type : River- valley/ Mining/ Industry/ Thermal/ Nuclear/Other (specify)	:	Mining 1 (a) - Mining of Minerals
2.	Name of the project	:	Saurashtra Chemicals Division of Nirma Ltd.
3.	Clearance letter (s)/OM No. and date	:	Letter No. J-11015/1227/2007-IA.II(M) dated 17/09/2014.
4.	Location :		Ranavav limestone mining project (31.28 Ha.), Village: Ranavav, Tehsil: Ranavav
	a) District (s)	:	Porbandar
	b) State (s)	:	Gujarat
	c) Location Latitude/Longitude	:	Latitude : 21°41'8.54"N - 21°40'44.87"N Longitude : 69°45'46.32"E - 69°45'17.6"E
5.	Address for correspondence		
	a) Address of the Concerned Project Chief Engineer (with Pin Code & telephone/ telex/ fax numbers)	:	Mr. Ashish Desai Project Coordinator Nirma House Ashram Road, Ahmedabad-380009
	b) Address of the Executive Project Engineer / Manager	:	Shri G. J. Adroja, Vice President, Nirma House, Ashram Road, Ahmedabad-380009
6.	Salient features		
	a) Of the project		
	Project Name	:	Ranavav Limestone Mine
	Area	:	31.28 Ha.
	Capacity	:	0.20 Million tones per annum
	New/Expansion/Modernization	:	Expansion of existing mine
	Category	:	A
	Land use of the lease area	:	Govt. Waste land
	Life of mine	:	12 years at proposed production rate
	Seismic Zone	:	Seismic Zone -III
	Elevation	:	26 - 32 m AMSL

	<p>b) Of the EMP</p> <ul style="list-style-type: none">➤ Digged out pits will be used for rain water harvesting after closure of the mine.➤ Mining in the area will be done up to depth of 7.0 m from the surface level well above ground water table, therefore impact on water regime is not anticipated.➤ Water sprinkling system to control fugitive dust emissions.➤ Controlled blasting methods.➤ Regular checking and maintenance of vehicles to avoid noise pollution.																																	
7.	<p>Break up of the project area</p> <p>a) Submergence area: forest & non-Forest</p> <p>b) Others</p>	<p>Total Lease area – 31.28 Ha. Govt. Waste Land</p> <table><tr><th>Particulars</th><th>Pre-operation al phase (Ha.)</th><th>Operation al Phase (after 5 Years) (Ha.)</th><th>Post Mining (Conceptu al phase) at the end of Mine Life (Ha.)</th></tr><tr><td>Pits & Quarries</td><td>11.789</td><td>14.121</td><td>24.16</td></tr><tr><td>Dumps of ore, waste, OB</td><td>0.04</td><td>-</td><td>-</td></tr><tr><td>Mineral Stack</td><td>-</td><td>-</td><td>-</td></tr><tr><td>Infrastructure , road, magazine</td><td>0.65</td><td>0.65</td><td>0.65</td></tr><tr><td>Plantation</td><td>0.10</td><td>0.50</td><td>5.98</td></tr><tr><td>Remaining land</td><td>18.701</td><td>16.009</td><td>0.49</td></tr><tr><td>Total area</td><td>31.28</td><td>31.28</td><td>31.28</td></tr></table>	Particulars	Pre-operation al phase (Ha.)	Operation al Phase (after 5 Years) (Ha.)	Post Mining (Conceptu al phase) at the end of Mine Life (Ha.)	Pits & Quarries	11.789	14.121	24.16	Dumps of ore, waste, OB	0.04	-	-	Mineral Stack	-	-	-	Infrastructure , road, magazine	0.65	0.65	0.65	Plantation	0.10	0.50	5.98	Remaining land	18.701	16.009	0.49	Total area	31.28	31.28	31.28
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Total area	31.28	31.28	31.28																															
8.	<p>Break up of the project affected population with enumeration of those losing houses/dwelling units only agricultural land only both dwelling units & agricultural land & landless laborers/artisans:</p> <p>a) SC, ST/Adivasi</p> <p>b) Others</p> <p>(Please indicate whether these figures are based on any scientific and systematic survey carried out or only provisional figures, if a survey is carried out give details & year of survey)</p>	<p>Not Applicable. Expansion project is establishing in the existing mine only.</p>																																
9.	<p>Financial details :</p> <p>a) Project cost as originally planned and subsequent revised estimates and the year of price reference</p>	<p>The estimated cost of the project is Rs.15 Lacs.</p>																																

	b) Allocation made for EMP with item wise and year wise break-up c) BC ratio/IRR and the year of assessment d) Whether © includes the cost of EM as shown in the above e) Actual expenditure incurred on the project so far f) Actual expenditure incurred on the EMP so far	:	Rs. 3.60 lacs ---- ---- Mine is not in operation since October, 2012. Hence no expenditure has been done since then. However, allocation made for EMP is as detailed below:												
			<table><tr><th>Sr. No.</th><th>Annual Recurring Expenditure Toward</th><th>Cost Allocated (Rs.)</th></tr><tr><td>1</td><td>Environment Protection Measures *</td><td>3.60 Lakhs</td></tr><tr><td>2</td><td>Socio-Economic Welfare</td><td>1.50 Lakhs</td></tr><tr><td>3</td><td>Wildlife Conservation Plan</td><td>9.50 Lakhs</td></tr></table> * Allocation made for monitoring purpose, considering air, water, noise & soil monitoring, is 2.43 lakhs per year. Green belt development is Rs. 1.5 lacs (approximate capital cost) and Rs. 0.5 lacs (approximate recurring cost).	Sr. No.	Annual Recurring Expenditure Toward	Cost Allocated (Rs.)	1	Environment Protection Measures *	3.60 Lakhs	2	Socio-Economic Welfare	1.50 Lakhs	3	Wildlife Conservation Plan	9.50 Lakhs
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1	Environment Protection Measures *	3.60 Lakhs													
2	Socio-Economic Welfare	1.50 Lakhs													
3	Wildlife Conservation Plan	9.50 Lakhs													
10	Forest land requirement a) The status of approval for diversion of forest land for non-forestry use b) The status of clearing felling c) The status of CA, if any d) Comments on the viability & sustainability of CA program in the light of actual field experience so far	:	Not Applicable												
11	The status of clear falling in non-forest areas (Such as submergence area or reservoir, approach Roads.), if any with quantitative information required.	:	Not Applicable												
12	Status of construction (Actual &/or planned) a) Date of commencement (Actual &/or planned) b) Date of completion (Actual &/or planned)	:	It is in existing mine since 1981.												
13	Reason for delay If the project is yet to start.	:	Not Applicable												
14	Dates of site visits a. The dates on which the project was monitored by the RO on previous occasions, if any b. Date of site visits for this monitoring report	:	19.01.2017												

15	Details of correspondence with PA for obtaining action plans/information on status of compliance to safeguards other than the routine letters for logistic support for site visits.	:	As below
	Date	Letter from RO	Date Reply from PA
	19.11.2014	3-36/2014(ENV)/2019	13.02.2017 Mail Received from PA
			21.09.2016 Letter no. SC/PB/ENV-115/241/2017

PART – II & III
DESCRIPTIVE REPORT ON STATUS OF COMPLIANCE FOR THE
PERIOD OF JULY 2016 - DECEMBER 2016 TO CONDITIONS OF
ENVIRONMENTAL CLEARANCE AND ENVIRONMENTAL
MANAGEMENT

J-11015/1227/2007-IA.II (M) Dated 17.09.2014

Sr. No.	EC Condition	Compliance Status
A	Specific Conditions	
i.	The environmental clearance is subject to obtaining clearance from the Standing Committee of National Board for Wildlife.	<p>PP submitted the following: The Chief Wildlife warden Gandhinagar had issued an NOC vide letter No. WLP/32/A/1601-02/2011-12 dated 13/01/2012 for said mining lease. However, as per requirement, they have submitted an application to Dy. Conservator of Forest, Porbandar in prescribed NBWL format vide our letter dated 23.01.2012. The DCF, Porbandar had forwarded the recommendation to the Chief Wildlife Warden, Gandhinagar and in turn the State Wildlife Board has forwarded the proposal with their recommendation. The application is under consideration at State Wildlife Board. However, PP could not/did not explain if the PP started operation in absence of such clearance.</p> <p>Under compliance.</p>
ii.	The project proponent shall obtain Consent to Establish and Consent to Operate from the State Pollution Control Board, Gujarat and effectively implement all the conditions stipulated therein.	<p>PP submitted as below: Consent to Establish as well as consent to operate has been obtained from the GPCB and they are implementing stipulated condition. The mine was not in operation from July, 2016 to December, 2016. Hence, conditions stipulated in consent order were not complied. compliance of the Consent to Operate is provided separately. Complied.</p>
iii.	Environmental clearance is subject to final order of the Hon'ble Supreme Court of India in the matter of Goa Foundation Vs. Union of India in Writ Petition(Civil) No. 460 of 2004, as may be applicable to this project.	<p>PP stated that Company will abide to the final order of the Hon'ble Supreme Court of India in the matter of Goa Foundation Vs. Union of India in Writ Petition No. 460 of 2004. As per the Writ Petition (Civil) No. 435 of 2012, distance of mine lease from Barda Wildlife Sanctuary is 2.97 km. As per the final order of the Hon'ble Supreme Court of India in the matter of Goa Foundation</p>

		<p>Vs. Union of India, application to obtain clearance from standing committee of NBWL has already been done and details of the same is described in point no. 1 of specific conditions.</p> <p>Noted for compliance.</p>
iv.	<p>The Company shall submit within 3 months their policy towards Corporate Environment Responsibility which should inter-alia provide for (i) Standard operating process/process to bring into focus any infringement/deviation/violation of the environmental or forest norms/conditions, (ii) Hierarchical system or Administrative order of the company to deal with the environmental issues and for ensuring compliance with the EC conditions and (iii) System of reporting of non-compliances / violations of environmental norms to the Board of Directors of the company and /or shareholders or stakeholders.</p>	<p>PP submitted as below:</p> <p>This mine is a captive mine and mined out limestone is utilized in company's own soda ash plant located at Birlasagar, Porbandar.</p> <p>Company has well laid down Policy approved by Board of directors for Safety, Health & Environment and Social accountability which has been provided separately with the present EC compliance.</p> <p>Company has well established Environmental Management System which is headed by Director. A well-qualified and efficient environment staff has been deputed for maintenance and monitoring of pollution control system. Administrative order has been provided separately.</p> <p>Company has established well laid system to deal with the non-compliance of environmental norms /emergency situation and provided separately.</p> <p>However, these were not submitted within 3 months as was mandated in the condition.</p> <p>Not complied.</p>
v.	<p>The project proponent shall ensure that no natural watercourse and/or water resources shall be obstructed due to any mining operations. The water recovery and runoff water system shall be so designed that the natural water resources are not affected and that no runoff water goes into the nearby rivers. Adequate measures shall be taken for conservation and protection of the first order and the second order streams, if any, emanating from the mine lease area during the course of mining operation.</p>	<p>PP submitted as under:</p> <p>No mining activity was undertaken during July, 2016 to December, 2016. Hence, no watercourse and/or water resources were obstructed.</p> <p>Further, as per the approved mining plan, no watercourse and/or water resources will be obstructed during the mine life as ultimate pit limit of the mine is 7 m BGL and ground water level in the core zone is 20 – 25 m BGL.</p> <p>Complied</p>
vi.	<p>The top soil, if any shall temporarily be stored at earmarked site(s) only and it shall not be kept unutilized for long. The topsoil shall be used for land reclamation and plantation.</p>	<p>PP stated that no mining activity was undertaken during July, 2016 to December, 2016.</p> <p>As per approved mining plan, there is no top soil present. However, if any top soil will be encountered, it will be used for plantation purpose.</p> <p>Complied.</p>

vii.	The sub grade material, if any shall be stacked at the earmarked sites.	<p>PP submitted that no mining activity was undertaken during July, 2016 to December, 2016.</p> <p>Further, as per approved mining plan, sub grade material generated during the mining will be stacked on pit floor as temporary stacking.</p> <p>complied</p>
viii.	<p>Garland drains, settling tanks, catch drains, siltation ponds and check dams of appropriate size shall be constructed around the mine working, sub-grade, and mineral dump(s) to prevent run off of water and flow of sediments directly into the other water bodies or seepage into the groundwater. The water so collected shall be utilized for watering the mine area, roads, green belt development etc. The drains shall be regularly desilted particularly after the monsoon and maintained properly. The sump capacity shall be designed keeping 50% safety margin over and above peak sudden rainfall (based on 50 years data) and maximum discharge in the area adjoining the mine site. Sump capacity shall also provide adequate retention period to allow proper settling of silt material. Sedimentation pits shall be constructed at the corners of the garland drains and desilted at regular intervals.</p>	<p>PP submitted the following:</p> <p>As mine is not in operation since company obtained Environmental Clearance in September, 2014, construction of Garland drains, settling tanks, catch drains, siltation ponds and check dams of appropriate size have not been done.</p> <p>Once the mine will be in operation, garland drain will be constructed on all sides of quarry along with settling pond to remove the suspended solids from storm water. The collected water will be used in plantation and spraying on haul roads.</p> <p>The drains will be regularly de-silted especially after the monsoon and will be maintained properly.</p> <p>Settling pond will be designed on the basis of silt loading, slope of lease area, detention time required, etc.</p> <p>These measures needed and ought to be to be taken before actual mining operation commences. The argument that these will be attended once mining operation begins not found tenable as there will be hardly any time left to attend them in that case. PP needs to put them in place beforehand.</p> <p>Not complied.</p>
ix.	The proponent shall carry out long term studies on salinity ingress, if any, in the ground water around the mining lease. If at any stage, ingress of salinity is observed, immediately corrective measures shall be taken in this regard.	<p>PP submitted as below:</p> <p>As per regular monitoring, done on six monthly basis, of the ground water surrounding the mining area, no salinity ingress has been observed. Hence, no corrective measures are needed to be undertaken.</p> <p>However, if any salinity ingress will be observed in the core as well as in the buffer zone during the life of mine, suitable measures will be adopted to mitigate the same.</p>

		<p>However, in support, the PP neither submitted test result details nor quoted the value of the results obtained through studies. And if at all, if that has been done by accredited firm. These documents to be submitted in next report and since operation yet to commence, compliance may be deemed.</p> <p>Deemed complied.</p>
x.	<p>The project authority shall implement suitable conservation measures to augment ground water resources in the area in consultation with the Regional Director, Central Groundwater Board.</p>	<p>PP submitted the following: No mining activity was undertaken during July, 2016 to December, 2016. Further, as the mine is not in operation since proponent obtained EC in September, 2014. Hence, consultation with the Regional Director, Central Ground Water Board has not been done. However, measures for ground water conservation by using the rainwater stored in exhausted mined out pits for green belt development and recharge of groundwater is being done.</p> <p>From the above, it is clear that the very spirit of the condition has been given short shrift and nothing has been done to augment GW as mandated.</p> <p>Not complied.</p>
xi.	<p>Monitoring and management of rehabilitated areas shall continue until the vegetation becomes self-sustaining. Compliance status shall be submitted to the Ministry of Environment & Forests and its Regional Office located at Bhopal on six monthly bases.</p>	<p>PP stated that No rehabilitation took place since the mining lease is an existing mine and categorized as a Govt. wasteland. Hence, compliance status of monitoring and management of rehabilitated area has not been submitted to the Ministry of Environment, Forest & Climate Change and its Regional office located at Bhopal.</p> <p>Not Applicable.</p>
xii.	<p>Plantation shall be raised in 5.98 ha including a 7.5m wide green belt in the safety zone around the mining lease, backfilled and reclaimed area, mine benches, around water body, roads etc. in consultation with the local DFO/Agriculture Department. The Greenbelt shall be developed all along the mine lease area in a phased manner and shall be completed within first five years.</p>	<p>PP submitted the following: Plantation will be done around the pit boundary and on the reclaimed land. Plantation is proposed to develop green belt in 7.5 m barrier along the lease boundary. At present, plantation at mine site is over an area of 0.7 ha. During the last 3 years total of 900 trees were planted and out of all 470 trees have survived. Phase wise plantation programme as per EMP is being implemented and we will</p>

		<p>try our best to accomplish the plantation in an area of 5.98 ha.</p> <p>Plantation will be done on regular phased manner. 300 saplings are being planted every year. Plantation will cover an area of 5.98 Ha. by the end of mine life.</p> <p>However, the activity needs serious attention keeping in view the application of PP for enhanced capacity production.</p> <p>PP had no answer on the mandatory consultation of DFO/Agricultural department and hence it can be concluded as under compliance. This may begin soon.</p> <p>Under compliance.</p>
xiii.	Effective safeguard measures such as regular water sprinkling shall be carried out in critical areas prone to air pollution and having high levels of particulate matter such as around crushing and screening plant, loading and unloading points and transfer points.	<p>PP submitted that</p> <p>No mining was undertaken during July, 2016 to December, 2016. Hence, no safeguard measures were carried out during the said period of mine.</p> <p>Further, during the operational phase only drilling, blasting and manual sizing will be done at mine site. No crushing and screening plant will be done at mine site. However, regular water sprinkling will be carried out in critical areas prone to air pollution once mine will be in operation.</p> <p>As mining is not in operation and based on above submission, this may be presumed to be complied.</p> <p>Complied.</p>
xiv.	Extensive water sprinkling shall be carried out on haul roads. It shall be ensured that the Ambient Air Quality parameters conform to the norms prescribed by the Central Pollution Control Board in this regard.	<p>No mining activity was undertaken during July, 2016 to December, 2016. Hence, water sprinkling on haul roads, during the said period of time, was not done.</p> <p>Further, extensive water sprinkling will be carried out on haul roads once the mine will be in operation.</p> <p>As mining is not in operation and based on above submission, this may be presumed to be complied.</p> <p>Complied.</p>
xv.	<p>Regular monitoring of ground water level and quality shall be carried out in and around the mine lease by establishing a network of existing wells and installing new piezometers during the mining operation.</p> <p>The periodic monitoring [(at least four times in a year- pre-monsoon (April-May),</p>	<p>PP submitted the following:</p> <p>Regular monitoring, i.e. on six monthly basis, of ground water level and quality has been carried out in and around the mining lease area and are being regularly. Monitoring results have been provided. Results indicate that, average result of pH is 6.9 pH unit, average result of Total</p>

	<p>monsoon(August), post-monsoon (November) and winter (January); once in each season]] shall be carried out in consultation with the State Ground Water Board/Central Ground Water Authority and the data thus collected may be sent regularly to the Ministry of Environment and Forests and its Regional Office Bhopal, the Central Ground Water Authority and the Regional Director, Central Ground Water Board.</p> <p>If at any stage, it is observed that the groundwater tables getting depleted due to the mining activity; necessary corrective measures shall be carried out.</p>	<p>Solids is 700 ppm, average result of Total Hardness is 410 ppm & average result of Total Alkalinity is 330 ppm.</p> <p>As the mine is not in operation, monitoring of ground water is done on six monthly basis. Periodic monitoring as suggested in the condition will be carried out once mine will be in operation.</p> <p>Collected ground water data, during the monitoring, are regularly being submitted to Regional Office, Ministry of Environment, Forest & Climate change, Bhopal as a part of six monthly compliances.</p> <p>Once the mine will be in operation, monitoring reports of ground water will be regularly submitted to the Regional Director, Central Ground Water Board.</p> <p>If at any stage of mining, depletion of ground water will be observed; necessary actions will be carried out to mitigate the same.</p> <p>However, about ground water table nothing has been stated. Therefore, as mining is not in operation and based on above submission, this may be presumed to be partly complied.</p> <p>Partly complied.</p>
xvi.	<p>Appropriate mitigative measures shall be taken to prevent pollution of the nearby water bodies.</p>	<p>PP submitted that No water body is available within 5 km radius of the lease area. Nearest water body is Kambhada Reservoir, which is located at a distance of 8.0 km in North direction. Hence, mitigative measures for the same are not required.</p> <p>Not Applicable.</p>
xvii.	<p>The project proponent shall obtain necessary prior permission of the competent authorities for drawl of requisite quantity of surface water / groundwater required for the project as also for pumping of ground water.</p> <p>The project proponent shall take effective measures for conservation of water.</p>	<p>PP submitted the following:</p> <p>Requirement of groundwater for the mine lease is fulfilled from Dharampur-Kajawadri limestone mine (18.21 Ha) and necessary permission from CGWA has been obtained. Copy of the same has been provided.</p> <p>Results indicate that, average result of pH is 6.9 pH unit, average result of Total Solids is 700 ppm, average result of Total Hardness is 410 ppm & average result of Total Alkalinity is 330 ppm.</p> <p>Further, measures for ground water conservation by using the rainwater stored in exhausted mined out pits for green belt development and recharge of ground water are being carried out.</p>

		Based on the above submissions, it may be concluded as complied. Complied.
xviii.	Suitable rainwater harvesting measures on long term basis shall be planned and implemented in consultation with the Regional Director, Central Ground water Board.	PP submitted as below: As the mine is not in operation since proponent obtained EC in September, 2014. Hence, consultation with the Regional Director, Central Ground Water Board has not been done. Consultation with the Regional Director, Central Ground Water Board will be done, for suitable rainwater harvesting measures, will be done once the mine will be in operation. The consultation and measures need to be taken beforehand. Therefore, the condition has not been attended to. Not complied.
xix.	Vehicular emissions shall be kept under control and regularly monitored.	PP submitted as under: No mining activity was undertaken during July, 2016 to December, 2016. Hence, no transportation of mineral was done during the said period of time. However, during the operational phase, PUC certificate is made compulsory for all the transport vehicles. Instruction to transporters is issued that trucks should be covered with tarpaulin. Based on the above submissions, it may be concluded as complied. Complied.
xx.	Measures shall be taken for maintenance of vehicles used in mining operations and in transportation of mineral. The mineral transportation shall be carried out through the covered trucks only and the vehicles carrying the mineral shall not be overloaded.	PP submitted as under: No mining activity was undertaken during July, 2016 to December, 2016. Hence, no vehicles were used for the transportation of mineral during the said period for time. However, during the operational phase, speed limit of the transport vehicles has been set to avoid air pollution. PUC certificate is made compulsory for all the transport vehicles. Instruction to transporters is issued that trucks have to be covered with tarpaulin and should not be over loaded. Based on above submissions, the condition may be presumed to have been complied. Complied.
xxi.	No blasting shall be carried out after the sunset. Blasting operation shall be carried out only	PP submitted as under: No mining activity was undertaken during July, 2016 to December, 2016. Hence, no blasting was done for the

	<p>during the daytime.</p> <p>Controlled blasting shall be practiced.</p> <p>The mitigative measures for control of ground vibrations and to arrest fly rocks and boulders shall be implemented.</p>	<p>extraction of mineral during the said period of time.</p> <p>Further, during the operational phase, mine working is done in general shift only and Blasting is done during mid-hours of the general shift and is being carried out as per DGMS norms. The mitigative measures for control of ground vibration and fly rocks are being taken care during blasting. Further, delay detonators are being used during the blasting to minimize the vibration level.</p> <p>Based on above submissions, the condition is complied.</p> <p>Complied.</p>
xxii.	<p>Drills shall either be operated with the dust extractors or equipped with water injection system.</p>	<p>PP submitted as under:</p> <p>No mining activity was undertaken during July, 2016 to December, 2016. Hence, no drilling operation was done during the said period of time.</p> <p>Further, during the operational phase, water injection system is being adopted while drilling in the mine area for efficient dust control.</p> <p>Based on above submissions, the condition may be presumed to have been complied.</p> <p>Complied.</p>
xxiii.	<p>Mineral handling area shall be provided with adequate number of high efficiency dust extraction system.</p> <p>Loading and unloading areas including all the transfer points shall also have efficient dust control arrangements.</p> <p>These shall be properly maintained and operated.</p>	<p>PP submitted as under:</p> <p>No mining activity was undertaken during July, 2016 to December, 2016. Hence, neither any mineral handling nor loading and unloading of mineral was done.</p> <p>Further, during the operational phase, only drilling, blasting and manual sizing is being carried out at mine site. Sized limestone is sent directly to plant for further processing. Water sprinkling is being done during the loading of limestone in transportation vehicles.</p> <p>However the response about availability of adequate facilities and equipments which needs to be in place beforehand is missing. The PP is referring only to operational phase in support of non-compliance. Therefore, there is no mention by PP on their proper operation and maintenance too. From the above cryptic submission, it cannot be concluded that condition is complied.</p> <p>Not complied.</p>

xxiv.	<p>The waste water from the mine working shall be properly collected, treated so as to conform to the standards prescribed under GSR 422 (E) dated 19th May, 1993 and 31st December, 1993 or as amended from time to time. Oil and grease trap should be installed before discharge of workshop effluents.</p>	<p>PP submitted as under: Water requirement is only for drinking, dust suppression, and greenbelt development. No waste water will be generated during the life of mine. Hence, there is no requirement of any wastewater treatment facility. Further, workshop effluent at mine site will not be generated as there is no workshop available at mine site.</p> <p>Unless the condition is deleted or amended; through proper application to MoEF&CC, ND the argument may not be accepted. "as there is no workshop available at mine site" as stated by PP is also untenable since workshop may come up depending on number of vehicles/trucks etc. In any case, till such time a decision on the condition is taken based on PP's submission, it may not be treated as either not applicable nor complied. Not complied.</p>
xxv.	<p>Pre-placement medical examination and periodical medical examination of the workers engaged in the project shall be carried out and records maintained. For the purpose, schedule of health examination of the workers should be drawn and followed accordingly.</p>	<p>PP submitted as under: Periodical medical examination of the workers engaged in the project is carried out on regular basis as per MMR, 1961 and records of the same are maintained. Medical examination of the workers engaged in the mining activity during 2014-15 was done in April, 2015. As the mine was not in operation since then, no workers were engaged in the mining and hence, medical examination was not carried out. Based on above submissions, the condition may be presumed to have been complied. However, proper medical centre could not be shown at site. Complied.</p>
xxvi.	<p>Occupational health surveillance program of the workers shall be undertaken periodically to observe any contractions due to exposure to dust and take corrective measures, if needed.</p> <p>Health records of the workers shall be maintained.</p>	<p>PP submitted as under: Initial and periodic medical examination of mine workers is done as per MMR 1961 and records are maintained. Medical examination of the workers engaged in the mining activity during 2014-15 was done in April, 2015. As the mine was not in operation since then, no workers were engaged in the mining and hence, medical examination was not carried out.</p>

		Since the mine is not in operation no it can therefore, be concluded a complied.
xxvii.	<p>The project proponent shall take all precautionary measures during mining operation for conservation and protection of endangered flora and endangered fauna, if any.</p> <p>Action plan for conservation of flora and fauna prepared shall be implemented in consultation with the State Forest and Wildlife Department.</p> <p>All the safeguard measures brought out in the Wildlife Conservation Plan prepared specific to this project site shall be effectively implemented.</p> <p>Necessary allocation of funds for implementation of the conservation plan shall be made and the funds so allocated shall be included in the project cost.</p> <p>A copy of action plan shall be submitted to the Regional Office of the Ministry of Environment and Forests, Bhopal.</p>	<p>Complied</p> <p>PP submitted as under: No endangered flora or fauna are present in the core zone. However, due to presence of Barda Wildlife Sanctuary within 5 km radius of mine lease, wildlife conservation measure approved by Range Forest Officer, Ranavav are being implemented during the mining operations.</p> <p>As the mine is not in operation since company obtained Environmental Clearance in September, 2014, action plan for conservation of flora and fauna have not been prepared.</p> <p>Once the mine will be in operation, action plan for the same will be prepared and implemented in consultation with the State Forest and Wildlife Department and all the safeguard measures provided in the Wildlife Conservation plan will be effectively implemented</p> <p>Necessary funds will be allocated, for implementation of the conservation plan, once the mine will be in operation.</p> <p>Further, the action plan prepared will be submitted to the Regional Office, Ministry of Environment, Forest & Climate Change located at Bhopal.</p> <p>It may be seen that such action plan should be in readiness before the mining operation actually commences. Therefore, the argument for non-initiation of action by PP may not be acceptable. It reflects either gross misunderstanding of the subject or ignorance /reluctance to comply.</p> <p>Not complied.</p>
xxviii.	Digital processing of the entire lease area using remote sensing technique shall be done	<p>PP submitted as under: The said mine is not in operation since October, 2012.</p>

	<p>regularly once in three years for monitoring land use pattern and report submitted to MoEF and its Regional office.</p>	<p>However, application for DG.P.S. has already been submitted to District Inspector of Land Records, Government of Gujarat, Porbandar and The Settlement Commissioner & Director of Land Records, Government of Gujarat, Gandhinagar vide letter dated 15.07.2010 & 24.01.2011 respectively.</p> <p>As the mine is not in operation since company obtained Environmental Clearance in September, 2014, no further efforts for conducting D.G.P.S. had been done.</p> <p>D.G.P.S. will be done once the mine will be in operation.</p> <p>However, due to non-operation, the PP should not have stopped their effort. PP should start this soon although, for this time, it may be treated as complied.</p>
xxix.	<p>The critical parameters such as PM10 (size less than 10 micro meter), PM2.5(size less than 2.5 micro meter) and NOx in the ambient air within the impact zone, peak particle velocity at 300 m distance or within the nearest habitation, whichever is closer shall be monitored periodically.</p> <p>Further, quality of discharged water shall also be monitored [(TDS, DO, PH and Total Suspended Solids (TSS)]. The monitored data shall be uploaded on the website of the company as well as displayed on a display board at the project site at a suitable location near the main gate of the Company in public domain.</p> <p>The Circular No. J20012/1/2006-IA.II (M) dated 27.05.2009 issued by Ministry of Environment and Forests, which is available on the website of the Ministry www.envfor.nic.in, shall also be referred in this regard for its compliance.</p>	<p>PP submitted as under:</p> <p>Regular monitoring, i.e. on six monthly basis, of Ambient Air Quality of core area as well as buffer area is carried out by M/s. Comet Consultancy services (third party monitoring consultant). Ambient Air Quality Monitoring results are provided separately.</p> <p>Results indicate that, average result of PM₁₀ is 43µg/m³, average result of PM_{2.5} is 19µg/m³, average result of SO_x is 9.68µg/m³ & average result of NO_x is 12.53µg/m³.</p> <p>Further, water requirement will be for drinking, dust suppression and green belt development only. Further, domestic sewage generated from mine site will be treated in septic tank/soak pit, no water will be discharged. Hence, monitoring of the same is not required.</p> <p>As the mine is not in operation since company obtained Environmental Clearance in September, 2014; monitored data are not being uploaded on company's website. Once the mine will be in operation, monitored data will be regularly updated on company's website. Monitored data of ambient air are being regularly updated on the display board at the project site located near the main gate</p>

		<p>of the mine site. Except submission on water and pollution mitigation, others see contradictory. And also during inspection no display board was noticed or could be shown. And the PP is silent about Circular No. J-20012/1/2006-IA.II (M) dated 27.05.2009 issued by Ministry of Environment and Forests. However, since the mining is not in operation, this may be treated as partly attended. Partly complied.</p>
B	General conditions	
i.	No change in mining technology and scope of working shall be made without prior approval of the Ministry of Environment & Forests.	<p>PP submitted as under: No change in mining technology and scope of working will be made without prior approval of the Ministry of Environment, Forest & Climate Change. Noted for compliance.</p>
ii.	No change in the calendar plan including excavation, quantum of mineral and waste shall be made.	<p>PP stated that No change in calendar plan including excavation, quantum of mineral & waste will be made. Noted for compliance.</p>
iii.	At least four ambient air quality-monitoring stations shall be established in the core zone as well as in the buffer zone for RSPM (Particulate matter with size less than 10 micron i.e. PM10) and NOx monitoring. Location of the stations shall be decided based on the meteorological data, topographical features and environmentally and ecologically sensitive targets and frequency of monitoring shall be undertaken in consultation with the State Pollution Control Board.	<p>PP submitted as under: Four monitoring stations, for measurement of ambient air quality, have been decided and regular monitoring, i.e. on six monthly basis, of Ambient Air Quality of core area as well as buffer area is carried out by M/s. Comet Consultancy services (third party monitoring consultant) in consultation with State Pollution Control Board. Ambient Air Quality Monitoring results have been provided separately. Results indicate that, average result of PM₁₀ is 43µg/m³, average result of PM_{2.5} is 19µg/m³, average result of SO_x is 9.68µg/m³ & average result of NO_x is 12.53µg/m³. Location for the same has been decided considering the meteorological data, topographical features and environmentally and ecologically sensitive targets. The third party is an accredited Consultant. Complied.</p>

iv.	<p>Data on ambient air quality PM10 (size less than 10 micro meter), PM2.5 (size less than 2.5 micro meter) and NOx shall be regularly submitted to the Ministry including its Regional office located at Bhopal and the State Pollution Control Board / Central Pollution Control Board once in six months.</p>	<p>PP submitted as under: Regular monitoring, i.e. on six monthly basis, of Ambient Air Quality of core area as well as buffer area is carried out by M/s. Comet Consultancy services (third party monitoring consultant). Records of the same are being regularly submitted to Regional Office, MoEF&CC, Bhopal with six monthly Environmental Clearance compliance of the said mine and to State Pollution Control Board as per the requirement. The third party is an accredited Consultant. Complied.</p>
v.	<p>Fugitive dust emissions from all the sources shall be controlled regularly.</p> <p>Water spraying arrangement on reject yards and haul roads, loading and unloading and at transfer points shall be provided and properly maintained.</p>	<p>PP submitted the following: No mining activity was undertaken during July, 2016 to December, 2016. Hence, no fugitive emission from any sources was generated. Further, during the operational phase, only drilling, blasting and manual sizing is being carried out at mine site. Sized limestone is sent directly to plant for further processing. Regular water sprinkling on haul road, during loading of mineral are being done during the mining operations. Based on above submissions, the condition may be presumed to have been complied. Complied.</p>
vi.	<p>Measures shall be taken for control of noise levels below 85 dBA in the work environment.</p> <p>Workers engaged in operations of HEMM, etc. shall be provided with ear plugs / muffs.</p>	<p>PP submitted as under: No mining activity was undertaken during July, 2016 to December, 2016. Hence, neither any measures were taken to control noise nor any workers were engaged in operations of HEMM, etc. Further, good and regular maintenance of machinery, during the operational phase, is being ensured to keep the noise generated at minimum level. The vehicles operating will be maintained and provided with good silencers. Plantation of trees around haul roads is being done to reduce the noise. During the operational phase of mine, equipments like ear-muffs, ear-plugs, etc. are being used for hearing protection to the workers and operators working at drilling sites.</p>

		Based on above submissions, condition may be presumed to have been complied. Complied.
vii.	All the applicable safety procedures will be adhered and Personal Protective Equipments like nose masks, safety shoes, hand gloves, apron, ear plug, earmuff, safety goggles, safety belt, etc., shall be provided to ensure that people working during construction and operational phase are protected.	PP submitted as under: No mining activity was undertaken during July, 2016 to December, 2016. Hence, neither any safety procedures were adhered nor any workers were engaged in the mining activity. However, during the mining operations, protective equipments, such as nose masks, ear plug/ear muff, safety goggles, etc., for the workers engaged in operations are being provided and safety procedures are being adopted. Based on above submissions, the condition may be presumed to have been complied. Complied.
viii.	Personnel working in dusty areas shall wear protective respiratory devices and they shall also be provided with adequate training and information on safety and health aspects. Occupational health surveillance program of the workers shall be undertaken periodically to observe any contractions due to exposure to dust and take corrective measures, if needed.	PP submitted the following: During the operational phase, nose masks are being provided to personnel working in dusty areas to prevent their exposure to dust emission. Further, during the operational phase, water injection system is being adopted while drilling in the mine area for efficient dust control. Initial and periodic medical examination of mine workers is done as per MMR 1961 and records are maintained. Medical examination of the workers engaged in the mining activity during 2014-15 was done in April, 2015. Based on above submissions, the condition may be presumed to have been complied. Complied.
ix.	A separate environmental management cell with qualified personnel shall be set-up under the control of a Senior Executive, who will report directly to the Head of the Organization.	It has been stated that an Environment Management Cell with qualified personnel has been established under the control of a Senior Executive for looking after various environmental aspects. However, barring an entry level environmental officer could not see anyone else. A proper cell needs to be created as mandated in the condition. Partly complied.
x.	The funds earmarked for environmental protection measures shall be kept in separate account and shall not be diverted for other purpose. Year wise expenditure shall be	PP submitted as below: Rs. 3.60 lakhs per annum has been earmarked for environmental protection measures i.e. Pollution control, Pollution monitoring, Occupational Health, wildlife

	reported to the Ministry and its Regional Office located at Bhopal.	<p>conservation etc.</p> <p>Further Allocation made for monitoring purpose, considering air, water, noise & soil monitoring, is 2.43 lakhs per year.</p> <p>Further, no separate account of expenditure incurred for Environmental protection measure has kept. However, separate records are being maintained.</p> <p>As mandated, separate account was not opened. Condition needs full compliance.</p>
xi.	The project authorities shall inform to the Regional Office located at Bhopal regarding date of financial closures and final approval of the project by the concerned authorities and the date of start of land development work.	<p>Partly complied.</p> <p>PP submitted as under:</p> <p>Since the financial requirement is being met through internal accruals, no financial closure as well as final approval of the project by the concerned authorities is required.</p> <p>Further no land development is required since the mining lease is an existing mine.</p> <p>Based on above submissions, the condition may be presumed to have been complied.</p> <p>Complied.</p>
xii.	The Regional Office of this Ministry located at Bhopal shall monitor compliance of the stipulated conditions. The project authorities shall extend full cooperation to the officer (s) of the Regional Office by furnishing the requisite data / information / monitoring reports.	<p>PP stated that full cooperation to the officer (s) of the Regional Office of MoEF&CC is being provided for the purpose of monitoring of stipulated conditions and in furnishing the requisite data / information / monitoring report.</p> <p>Deemed complied.</p>
xiii.	<p>The project proponent shall submit six monthly reports on the status of compliance of the stipulated environmental clearance conditions including results of monitored data (both in hard copies as well as by email) to the Ministry of Environment and Forests, its Regional Office Bhopal, the respective Zonal Office of Central Pollution Control Board and the State Pollution Control Board.</p> <p>The proponent shall upload the status of compliance of the environmental clearance conditions, including results of monitored data on their website and shall update the same periodically.</p>	<p>PP submitted as under:</p> <p>Six monthly compliance report of the stipulated environmental clearance condition are being submitted to the competent authority on regular basis.</p> <p>Six monthly compliance report for the period of July - December, 2016 has been submitted vide our letter no. SC/PB/ENV-115/234/2016 dated 07.01.2017.</p> <p>Environmental Clearance obtained from Ministry of Environment, Forest & Climate Change has already been uploaded on company's website. Compliance status of the same including results of monitored data has been regularly updated on company's website.</p>

	It shall simultaneously be sent to the Regional Office of the Ministry of Environment and Forests, Bhopal, the respective Zonal Officer of Central Pollution Control Board and the State Pollution Control Board.	Hard copy of the compliance report has been regularly submitted to the Regional Office of Ministry of Environment, Forest and Climate Change on six monthly basis. PP has been submitting hardcopies of compliance report to RO prior to jan, 2017 also. Therefore, this may be presumed to be complied although as mining was not in operation since the EC was granted. Complied
xiv.	A copy of the clearance letter shall be sent by the proponent to concerned Panchayat, Zila Parisad, Municipal Corporation, Urban Local Body and the Local NGO, if any, from whom suggestions/ representations, if any, were received while processing the proposal. The clearance letter shall also be put on the website of the Company by the proponent.	PP submitted as under: Copy of the environmental clearance to the concerned person/authorities have already been provided vide our letters dated 07.10.2014. Environmental Clearance letter obtained from the Ministry of Environment, Forest and Climate Change has already been uploaded on company's website. The PP is required to produce copies of letter as mentioned in future compliance report. For the present, based on their submission, this may be treated as complied. Complied.
xv.	The State Pollution Control Board shall display a copy of the clearance letter at the Regional office, District Industry Centre and the Collector's office/Tehsildar's Office for 30 days.	PP informed that a copy of the Clearance letter obtained from Ministry of Environment, Forest and Climate Change had been displayed at Regional office, District Industry Center and the Collector's office for 30 days. Deemed complied.
xvi.	The environmental statement for each financial year ending 31st March inform-V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as prescribed under the Environment(Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Regional Office of the Ministry of Environment and Forests, Bhopal by mail.	PP submitted as under: As per the Environment (Protection) Rule, 1986 as amended subsequently, environmental statement is mandated to be submitted by the project proponent to concerned SPCB for each financial year. However, the said mine is not in operation since the proponent obtained Environmental Clearance in September, 2014. Environmental Statement for each year will be submitted once the mine will be in operation. Further, as the mine is not in operation, environmental statement and the compliance report of the condition stipulated in environmental clearance are not being updated on company's website.

		<p>However, once the mine will be in operation, the same will be updated on regular basis.</p> <p>Based on above submissions, the condition may be presumed to have been noted for compliance.</p> <p>Noted for compliance.</p>
xvii.	<p>The project authorities shall advertise at least in two local newspapers widely circulated, one of which shall be in the vernacular language of the locality concerned, within 7 days of the issue of the clearance letter informing that the project has been accorded environmental clearance and a copy of the clearance letter is available with the State Pollution Control Board and also at web site of the Ministry of Environment and Forests at http://envfor.nic.in and a copy of the same shall be forwarded to the Regional Office of this Ministry located at Bhopal.</p>	<p>PP submitted as under: Advertisement has been published in Phulchhab (Gujarati) as well as Indian Express (English) newspaper on dated 05.10.2014 informing the public that the project has been accorded Environmental Clearance. A copy of the clearance letter is available with the State Pollution Control Board and also at website of the Ministry of Environment, Forest & Climate Change. A copy of the clearance letter has been forwarded to the Regional Office of Ministry located at Bhopal vide our letter no. SC/PB/ENV-115/054/2014 dated 07.10.2014. However, the advertisement has not been published within 7 days from the issue of the clearance letter i.e from 17.9.2014 as has been mandated in the condition. A view may be taken by MoEF&CC, New Delhi in this regard since it has to be concluded as not complied. Not complied.</p>

1. Summary:

It may be seen that out of total 46 conditions, 23 are complied, 2 are under compliance, 4 have been noted for compliance, 3 are deemed complied, 2 are not applicable, 4 are partly complied and 8 are not complied. As reported by the PP, the mining operation is yet to commence. It merits mention that a major condition of obtaining wild life clearance, which is a prerequisite to begin mining operation is yet to be completed. Perusal of the above Report will point towards further deficiencies in preparedness by the PP in terms of a number of conditions. The Court case as mentioned below at sl 2 may also be taken note of.

2. Details of court cases

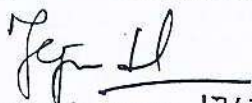
GPCB has filed a court complaint before LD judicial Magistrate First Class in Ranavav Court. Case No. 203/2013 dated 28.03.2013. Against this complaint company has filed a quashing proceeding before Gujarat High Court bearing no. SCRA 1568/14 & 738/15. Hon'ble High Court, while disposing off SCRA's, directed company and Trial Court, Ranavav. Company complied with the Hon'ble High Court directions and presently, matter is sub-judice at Ranavav Court.

3. Details of Show cause notice/closure notice.

PP stated that no Show Cause Notice/Closure Notice, till date, has been issued by CPCB/SPCB.

4. Others

At specific condition xxv, the PP in response has stated "Medical examination of the workers engaged in the mining activity during 2014-15 was done in April, 2015". Whereas, at other places it has submitted that since the time it obtained EC, operation has not started. PP therefore, needs to clarify if they started operation without Wildlife clearance and which may be construed as a violation.



Counter signed by: 17/7/17
Addl. PCCF (C)



Scientist 'G'