



भारत सरकार/Government of India
खान मंत्रालय/Ministry of Mines
भारतीय खान ब्यूरो/Indian Bureau of Mines
हैदराबाद क्षेत्रीय कार्यालय/Hyderabad Regional Office



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Room No.603, 6th Floor,
CGO Towers, Kavadiguda,
Secunderabad – 500 080
Date. 28.03.2019.

Shri Manvendra Mor,
Nominated Owner,
P.O.Shreeramnagar-535 101,
Garividi (M),
Vizianagaram District,A.P.

Sub: Submission of Modified Mining Plan in respect of Avagudem Manganese Mine of M/s R B S D
& F N Das over an extent of 13.868 ha in Sy.No. 124(P) of Avagudem Village, Garividi Mandal,
Vizianagaram district, A.P. submitted under Rule 17(3) of MCR, 2016.

Ref: Your letter no. nil dated.07.02.2019 Ref:

Sir,

With reference to your letter cited above on the subject, inspection of the mine was carried out on 07.03.2019 by Shri Ibrahim Sharief, Sr.ACOM, accompanied with Shri. R. Diwakar, Mines Manager and Dr B.S. Ganga Rao, QP and found certain deficiencies as given in Annexure. The same scrutiny comments have already been forwarded to you and your Qualified Person on respective e-mail ids i.e., info@sgminerals.com, rbssdfniasvzm@gmail.com and bsgangarao@yahoo.com

02. You are advised to attend these deficiencies as per the annexure and resubmit the document, complete in all respects, in three bound copies along with soft copy in the form of CD (2Nos.). In this regard you are directed to submit the Financial Assurance in the form of Bank Guarantee for the area put on use for Mining and allied activities @ Rs. Three lakhs/hectare for category 'A' mines provided that the minimum amount shall be Rs.Ten lakhs as per the provision of Rule 27(1) of MCDR, 2017 at the time of submission of final copies of the document within 15 (fifteen) days from the date of issue of this letter, failing which the document will be disposed without giving any further opportunity.

03. The para-wise clarification & the manner in which the deficiencies are attended should be given while forwarding modified document.

Yours faithfully,

Shailendra Kumar
28/3/19

(Shailendra Kumar)
Regional Controller of Mines

Shailendra Kumar
28/3/19

(Shailendra Kumar)
Regional Controller of Mines

मूल प्रति पर नहींकष्ट.

खान नियंत्रक (द), भारतीय खान ब्यूरो, बेंगलुरु।

शैलेन्द्र कुमार
28/3/19

(शैलेन्द्र कुमार)
क्षेत्रीय खान नियंत्रक

SCRUTINY OF MODIFIED MINING PLAN ALONG WITH FINAL MINE CLOSURE PLAN SUBMITTED IN RESPECT OF AVAGUDEM MANGANESE MINE OF M/S RBSSD & F N DASS OVER AN EXTENT OF 13.868 HA. IN AVAGUDEM VILLAGE GARIVIDI MANDAL, VIZIANAGARAM DISTRICT OF ANDHRA PRADESH

General:

- 1 Cover page, the date of transfer execution of lease is furnished as 04.11.2010 but as per the details no such transfer has been occurred for the lease, needs to be clarified.
- 2 During inspection of mines it was reported that DGPS survey of the lease area has been completed, copy of the same should be furnished duly authenticated by State Government authority. Accordingly undertaking for compliance of CCOM circular 2/2010 needs to be modified.
- 3 Consent letter should have been submitted by nominated owner shall be for 'Modified Mining Plan' instated of 'Review of Mining Plan'.
- 4 Final mine closure plan (FMCF) should be submitted as per the format of IBM manual for appraisal of FMCF, available at website www.ibm.nic.in, supported by necessary plans and sections and documentary evidence.
- 5 Consent letter, Certificates, declaration, undertakings should be submitted by nominated owner for Final Mine closure plan of company's original letter head duly dated and signed.
- 6 Certificates by Qualified person should also be submitted for Final Mine closure plan as per the IBM Manual for appraisal of FMCF
- 7 Geological report should be committed to furnish as per schedule IV 'A' of MEMC Rules 2015 within in time bound period.
- 8 Compliance of rule 63 of MCDE, 2017 regarding preservation of cores should be committed to be complied. Brief details of the same should be furnished.
- 9 On examination of earlier approved document it is observed that there is substantial reduction in Reserves (121) from 9,68,783 MT to 5,45,648 MT though 85,848 MT only produced after approval of earlier document, which needs justification
- 10 Plans and sections have not been maintained updated as per actual field conditions.
- 11 Lessee details:
Status of lease since first grant covering lease period, extent, deletion of area if any etc. should be furnished in introduction chapter in tabular form in chronological order along with copy of the G.O's, Lease deeds and lease sketches for easy reference
- 12 Photo identity proof and address proof of the Nominated owner should be furnished
- 13 As per the partnership deed, name of the firm is M/s Rai Bahaddur Seth Sreeram Durgaprasad and Fatechand Narsingh das (export firm), Lessee name should be furnished according to the lease deed.
- 14 Copy of registration of the firm under partnership Act 1932 (9 of 1932) should be furnished
- 15 Any legal proceedings/ conditions pertaining to lease area should be brought in to notice and furnished in the document, the same should be furnished in introduction chapter.
- 16 In page no.5, Land schedule of the lease area and Surface right held by the lessee should be furnished with documentary evidence. Land schedule is stated to be Government land as reported during inspection needs clarification.
- 17 Refer page no.6, date of grant of lease should be furnished as 16.11.1965 instead of 02.08.1994. Valid mail id, address, phone no. of firm and nominated owner should be furnished.
- 18 Status of statutory clearance like EC, CTO, CTE etc. should be furnished with supporting document in introduction chapter.
- 19 Village road, Nalla etc. is passing adjacent to lease area, the details of the same should be depicted legibly in relevant plans and sections
- 20 Review:
Review of earlier approved proposals should be submitted encompassing details of

development and production proposals, waste dumping, plantation, protective measures etc. in tabular form incorporating proposals, achievements with reasons deviations if any.

21 Deviation has been observed with respect to development and exploitation i.e. it was approved to development and production was within A-A' to E-E' but it was been carried out within F-F' to L-L', which needs justification.

22 Waste generation of 13195 cum, 43680 cum and 15260 cum is reported during the years 2016-17, 2017-18 & 2018-19 respectively but no waste dump is observed in the lease area during inspection. Clarification in this regard to be furnished in the review chapter.

23 Violation was pointed out by IBM vide letter dated 22.05.2018, 20/07/2018, 12/09/2018, but compliance status of the same is not furnished.

24 Para 3.6, reasons for modification of this document to be furnished clearly mentioning the correct rule position and the purpose. The present proposal should have been stated for the period 2019-20 only.

25 Para 3.7, status of low grade stock has been furnished without any basis. In this regard, proposal to be submitted for systematic and scientific sampling of so called low grade ore stacks and the analysis thereof be submitted. Quantum of the same to be submitted and Analysis be done by NABL accredited laboratory.

Geology and exploration

26 Local Geology of the lease area as per the field condition should have been submitted correlating the regional geology.

27 Thickness of ore body has been reported as 10 to 18 meters but as per the earlier approved document the same was reported as 20 to 45 meters and during inspection also thickness of ore body is found more than 18 meters. The above aspect has to be clarified.

28 Exploration carried out so far in the lease area should be furnished in tabular form in phase wise. Further expenditure incurred should be submitted with supporting document

29 For reserve estimation, factors like revised threshold value published by IBM, recovery factor based on time line series should have been considered. Some trenches should have been made to assess the characteristic/ behavior of ore body, and the same should have been considered for preparation of geological sections.

30 Justification of UNFC code should be furnished.

31 Feasibility report should be prepared as per MEMC Rules 2015.

32 Back ground computation of reserves, resources assessed in page no.32 should be furnished in tabular form.

33 Submission of grade of ore available in the lease area varies between 17% and 28% Mn content is contradictory to your earlier submission of 28.73 % Mn as average grade and 32.93% Mn as highest grade.

34 Small veins are also observed in the lease area, the details of the same should be furnished.

35 In the feasibility axis details of the Environmental Clearance (EC), CFE and CFO etc. have not been mentioned. Operating cost/tonne to be submitted as per the format of annual return, for ready reference.

Mining

36 Production quantity to be proposed as up to EC limit only.

37 Year wise development and production proposal should furnished for the balance period of 2018-19, i.e. date of survey and for the year 2019-20 only.

38 Pit lay out should be prepared in the year wise development proposals by considering the i.e. access road to the benches by ramps, bench height and width, pit slope angle etc. for safe and scientific mining. The pit lay out should be modified incorporating the above.

39 Details of all dumps (waste, mineral reject, sub grade) with location, geo coordinates, volume, dimensions and grade be submitted.

40 Details of generation of mineral reject (size & grade), grade, disposal and stacking

be discussed.

- 4 The bench heights of 3 mtrs to 15 mtrs and width of 1.5 to 2 mtrs were observed during inspection. In this regard, development proposals should be proposed to maintain 3 mtrs bench height and bench width not less than the height.
- 42 It was propose to work in pit bottom from 93 MRL to 75 MRL, as mine has not been developed properly as per approved mining plan and as observed in the field. In this regard slope stability study from institute of national repute should be carried out and submitted. Based on the report further mining can be considered. In the absence of the same pit bottom working cannot be acceptable. Hence proposal of development/ production should be restricted to 93 MRL only.
- 45 Computation of machinery requirement for the proposed development and production should be recalculated and submitted in view of comment at sl. no.41.
- 46 Man power employment should be furnished separately as 'Direct' and 'Contractual' as most of the persons are employed on contractual basis in the lease area.

Stocking/ Dumping of Mineral reject/Waste

- 47 During the plan period, waste dump has been proposed over an area on which low grade stock is exist at present. In this regard assessment of low grade stock with quantity and quality and proposal of re-handling for the same to designated place to avoid mixing of ore with waste should be furnished before such proposal of waste dump.
- 48 Quantity of waste to be generated vis-à-vis its disposal scheme should be discussed in detail. A summary of all dumps existing & proposed dumps covering its height, existing volume, area required for different types of wastes, mineral rejects, sub grade material etc. future plan for its rehabilitation to be discussed. The proposals of dumps should be supported with appropriate no. of plans and sections.
- 47 Waste dumping has been found outside the lease area, measures for its reclamation and rehabilitation, slope stability, protective measures should be detailed and furnished.
- Conceptual Plan
- 48 The conceptual mining chapter to be modified considering the ultimate economic depth, pit slope stability, existing exploratory information, balance reserves/ resources, future scope of mining, environmental protection, reclamation and rehabilitation as on date and at the end of plan period and also in accordance with comments stated above.
- 49 Protective measures like Fencing around quarry, retaining wall, garland drain, reclamation and rehabilitation proposals etc. should be detailed.
- 50 Status of Mineral reject /low grade stocks about their usage/stock , at the end of plan period should be discussed.
- Mine Drainage
- 51 Since mining operations have intersected the ground water table but study of impact of mining on Ground water table and vice-versa has not been carried out so for. In this regard study of the same from institute of National repute should be conducted and furnish the report before submitting proposal to excavate deeper than the existing pit bottom RL of 93 MRL.
- 52 There exist nala adjacent to lease area, the details of the same should be furnished.
- 53 Hydrological study should be proposed for the mining lease area based on average rainfall for last 5 years.
- Use of Minerals
- 54 Para 6.0(e), Material balance chart incorporating quantity and grade should be furnished right from ROM to Product/ Tailings/ mineral rejects. No beneficiation plant was observed in the lease area, the details may be pertaining to centralised stock yard, the same should be furnished.
- 55 In annual return, ore is being sold by Domestic transfer to M/s Radhika Metals and Minerals, but basis of the same is not furnished.

Environment

- 56 Information on different types flora and density of trees within lease area be
furnished.
- 57 Details like location, co-ordinates, dimensions of garland drain and retaining wall
be furnished.
- 58 Year wise plantation proposal be submitted with location, co-ordinates, types to be
planted with nos.
- 59 This being category mechanised mine, proposal for carrying out quarterly
Environmental monitoring be submitted giving the type of parameters considered
for monitoring, location name, co-ordinates, distance from mine etc.
Final Mine Closure Plan
- 60 Review of proposals in earlier approved PMCP should be carried out and furnished.
- 61 Proposal for fencing of the ultimate mining pit area be proposed for compliance of
provision of rule 26 of MCDR 2017 should be furnished.
- 62 Proposal for stabilization of the waste dumps, prevention measures for control of
erosion, siltation and dust generation from waste dumps be submitted.
- 63 Socio Economic Repercussions of closure of mine and manpower retrenchments be
discussed. Compensation if any, socio-economic repercussions and remedial
measures consequent to the closure of mines be analysed and submitted.
Plans and sections
- 64 Lease sketch authenticated by State Government should be submitted.
- 65 Location map of the lease area should be submitted.
- 66 Key plan should have been submitted on SOI topo sheet indicating the lease area
with details as per provision of rule 32(5)(a) of MCDR 2017.
- 67 In all the plans True North should be marked instead of magnetic North.
- 68 All Plans and sections shall be submitted on 1:1000 scale for proper depicting of
Benches, its RL, waste dump, stock yard etc..
- 69 Mining Engineer and Geologist should put their signature in relevant plans and
sections as per statute.
- 70 In Geological plan, cre exposure at different depth / benches should have been
demarcated for ready reference.
- 71 Benches marked in Geological sections are not matching with that of actual field
condition, slope failure on South Eastern side of lease area is observed, protective
measures to be proposed to maintain safe pit slope stability and corrective
measures
- 72 Geological section should be considered as base for year wise Development
sections. Further UPL, UNFC codes, bench RL's should be indicated
- 73 Conceptual plan indicating the outline of position of pits, dumps, stocks, green belt
development, reclamation & re-vegetation measures, infrastructure proposed at
the end of plan period should be submitted in consonance with the details
furnished in the text.
- 74 Financial assurance plan submitted is not comprehensive and to be simplified by
indicating the outline of area put to use at the start of plan period and additional
area proposed as per the detail in FA table, for easy reference