

Scrutiny comments on draft Review of Mining Plan & PMCP for Sivalarkulam limestone mine over 0.93.5ct in Sivalarkulam village Alankulam taluk of Tirunelveli district Owned by Southern Basic Chemicals submitted under rule 17(1) of MCR, 2016 & rule 23 of MCDR-2017 for the period from 2015-16 to 2019-20.

Introduction:

1. It is appraised in the document that the mine is working since execution ie from 11.3.1991. As per the records of this office, lessee has not having approved SOM/MP since year 1996. Mine is working past 20 years with-out approved document, shows that lessee is not having any regard to rules and regulations of Mining. Further it is also revealed from the records, that lessee has not been submitted required statutory notices & returns.

2. Para 3.1: It mentioned under the para that renewal application for ML has been submitted to state govt., on 05.10.2010, but the requisite document ie mining plan has not been submitted to this office for approval and a copy of acknowledgement to the renewal application issued by state govt., not annexed. In this regard a letter from state govt., need to be obtained indicating that the ML is valid.

3. Para 3.3(i): It is mentioned under the para and indicated in table no.8 that, 3 no of bore holes have been drilled, but no intimation regarding exploration in prescribed format of MCD Rules has been received in this office. The notice is supposed to be communicated within fifteen days after the commencement of such activity.

4. Para 3.3(ii): The quantity of top soil and waste generate/stacked are to be discussed under development para.

5. Para 3.3(iii): It is indicated that mine is working since execution, but monthly and annual returns are not being submitted. As per the table no.20, mine is under development, but mine photographs enclosed are not showing systematic development of mine and no notice /return has indicated such work is in progress as per the office records. The reasons for same may be explained.

6. Para 3.3(iv): Reason for working without approved SOM need to be explained under the para.

7. Para 3.4 & 3.5: The information furnished under the paras "no violation and no suspension was issued by IBM" is incorrect. This office has communicated suspension of mining operations under rule 13(2) of MCDR-1988 on 26.11.2012 as the mine is not having approved document.

Part-A

8. Para 1(j): During the inspection on 6.7.2016, it was observed that the central part of the pit was water logged and on the northern side of pit, only weathered material was observed. It was also indicated and observed that no outcrop, trench, pit and any sub-surface data supported for reserve calculation.

Hence, reserve calculation can be commented based on the confirmation of field data. However, Form-I&J annexed as -X dated 15.6.2017, shows that 3 no of bore holes have been drilled with minimum depth of 6.2m and maximum depth of 19.2m.

9. Para 2.0: Existing no of benches in OB and Ore and its dimension's need to be indicated under the para. During the previous inspection, a small pit about 3m-6m was observed, as per the current document depth of pit mentioned as 13m in one year period, with-out approved document when mine is under development. Year-wise production and development can be commented only after ascertaining the reserve and availability of sufficient quantity as per UNFC code (111).

10. Para 8.3.5: The expected generation of waste is about 3900 tonnes per year, but, no proposals on stabilization dump has made. Sufficient area has not earmarked for the purpose. In fact, the area for dumping has been reduced from 0.10.9 hect to 0.06.7 hect as per table no.64 needs explanation/correction. Total area and net area indicated in table no.64 should be verified for correctness.

11. All the chapters of PMCP, feasibility report, UNFC report should be reconciled as per scrutiny for the paras of review of mining plan.
12. Qualified Person should enclose certified copies of educational qualification and experience.
13. Copies of valid EC and PC needs to be submitted.

Annexures:

14. Annexures-IX: A copy of acknowledgement issued by state govt., on submission of renewal application need to be annexed.

Plates:

15. Plate no-IV: Reserve calculation can be commented on availability of authenticated field data.
16. Plate no-V: Sufficient quantity of limestone reserve should be ascertaining as per UNFC code (111).
17. Plate no.VI: No sufficient provision for dumping of waste which is more than 3900tonnes per year is made.

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