

Scrutiny Comments on examination of Review of Mining Plan with PMCP of Periyagalur Limestone Mine over an area of 4.98.5 Ha in Periyagalur Village, Ariyalur Taluk & District, Tamil Nadu, submitted by M/s Ultratech Cements Limited under rule Rule 17(2) of MCR, 2016

Mine Code – 38TMN24048 / Group – ‘A’ / Date of Inspection 06/07/2021

Cover, Introduction & General:

1. The document shall be submitted either for a block of five years or till the end of the lease period, whichever is shorter, instead of for just two years.
2. Page 12, Section 1.0 General – The name, address & contact details of the Nominated Owner of the mines shall be provided in this section instead of those of the Agent or the Qualified Person as provided.

Part-A:

3. Page 30, Section 1.i. Year-wise Future Program of Exploration – Four Boreholes had been proposed to be carried out in the previous Scheme Period during the year 2016-17 to confirm the ore continuity, but couldn't be drilled as the mine was not in operation since 2015. However, the same haven't been proposed to be carried out in the proposed plan. The entire potential area of mineralization shall be explored as required under Minerals (Evidence of Mineral Content) Rules, 2015 within the first year of the proposed plan period. The Geological Plans & Sections shall be revised accordingly.
4. Page 32, Section 1.j.3 – The basis for revising the Limestone Recovery Percentage from 70% as in the earlier estimate to 85% in the present estimate shall be recorded elaborately. Bulk-Density Test Report for the stated Tonnage Conversion Factor as well as Recovery Percentage Test Report either from a government laboratory or a third-party NABL-accredited laboratory shall be enclosed in the annexures.
5. Page 33, Table 1.7 – The Chemical Analysis of Representative Samples furnished in this table shall be obtained either from a government laboratory or a third-party NABL-accredited laboratory.
6. Page 41, Section 1.k., Table 1.9 – Bench-wise section height & width shall be provided, instead of just the cross sectional area & the mean distance, to facilitate the verification of the estimate. All calculations shall be provided as excel sheets in the CDs.
7. Page 46 to 52 – As the document shall be submitted either for a block of five years or till the end of the lease period, whichever is shorter, instead of for just two years, all references in the text & tables on these pages & elsewhere, including the plates, shall be revised to reflect the changed plan period.
8. Page 51, Table 2.6 – Bench-wise section height & width shall be provided, instead of just the cross sectional area & the mean distance, to facilitate the verification of the proposed yearly excavation quantities. All calculations shall be provided as excel sheets in the CDs.
9. Page 57 – The bench height & width has been proposed to be maintained at 6m & 7m respectively during the plan period but the same has been proposed to be maintained at 7m each for the ultimate pit. Changing the bench heights throughout the pit will not be feasible after the end of mining, so the same shall be proposed to be in line with the proposals during the current plan period.

10. Page 86, 87 – In the table summarizing the year-wise proposals for Progressive Mine Closure Plan for both the years, no afforestation/re-grassing has been proposed over the backfilled areas or the remaining worked-out benches that will not be left as a water reservoir. Pursuant to the order dated 14.01.2020 passed by Ministry of Mines, GoI, consequent upon the order dated 08.01.2020 of the Hon'ble Apex Court in WP(c) No 114/2014, proposals shall be incorporated to carry out re-grassing over the entire lease area. Also, afforestation of various species of plants shall also be proposed over the backfilled areas, not merely in the Safety Barrier Zone as proposed & shown on Plates 6, 8 & 11. Attempt must also be made to remove as much of undulations created due to mining activities as possible in an effort to create a naturally sloping terrain throughout the lease area.
11. The Consent Letter & the Undertaking shall be signed by the nominated owner of the mine instead of by the agent.

Annexures:

12. Annexure 3 – A complete copy of the lease deed along with the FMB shall be enclosed instead of just a part of it.
13. Annexure 4 – Copies of approval letters for all the plans/schemes of this lease approved by IBM till date shall also be enclosed.
14. Annexure 9 - Resolution of Board of Directors nominating the Owner of the mines shall also be enclosed.
15. Annexure 11 – Proof of Identification for the Qualified Person shall also be enclosed.
16. Annexure 12 – The Borehole Litho-logs submitted in this annexure have no authenticity. At least 10% of the drilled Borehole samples shall be analysed through a third-party NABL-accredited laboratory.
17. Annexure 13 – The Representative Sample Analysis Report enclosed in this annexure is not admissible as the same has been analysed neither by a government lab nor by a third-party NABL-accredited lab. The same shall be rectified in the final copy.
18. Annexure 16 – Copies of Environment Testing Reports with respect to Air Quality, Noise Levels & Water Quality for last four quarters, conducted by an NABL accredited agency, for core as well as buffer zone, shall be enclosed.

Plates:

19. Soft copies of .KML files for the lease boundary & other surface features shall be provided in the CD and in email.
20. Plate 1 – The index reference shows roads of two types with two different colors but it has not been specified whether which color corresponds to which type of road – public road, village road, mine road, etc. All roads drawn in different colors shall be referred to in the index specifically.
21. Plate 2 – Copies of FMB shall also be enclosed along with this plate.
22. Plate 3 – The existing dump lying beyond the lease area shall be erased from this plate as well as from all the other plates submitted along with this document.
23. Plate 5 – The height of the top-most bench along the western side of the northern pit of the lease as drawn on sections A-A' & C-C' seems to be much more than the approved height. The same shall be proposed to be terraced during this plan period to bring them in compliance with earlier approved plans/schemes. The Ultimate Pit Limit

- shall thus be re-drawn accommodating the altered pit profile and the same shall be shown on the Conceptual Plan & Sections in Plates 8 & 9.
24. Plates 4, 5, 6A, 6B, 7 – A Longitudinal Section shall be shown across each of the pits & the respective cross-sections be drawn marking the bench-wise mean-distance used for reserve & resource estimation as well as Production & Development Quantity proposals.
 25. Plates 6 & 7 – Year-wise Plans & Sections shall be drawn for all the individual years of proposed plan period as advised to be rectified in point 1.
 26. A “Reclamation Plan” shall also be submitted outlining the year-wise reclamation activities proposed during the plan period.
 27. Plate 11 – The Progressive Mine Closure Plan shall show the excavation, reclamation & afforestation proposals for each of the years individually instead of for the entire block of years.
 28. A “Financial Area Assurance Plan” showing the outlines of all the items under the Financial Assurance Table at the end of the plan period in different colours shall also be enclosed as a separate plate for the purpose of computation of areas required to be used in the proposed plan period.

Matiul Islam
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