

**Scrutiny Comments on examination of Final Mine Closure Plan of Reddipalayam-Pudupalayam Limestone Mine over an area of 32.645 Ha in Reddipalayam & Pudupalayam Villages, Ariyalur Taluk & District, Tamil Nadu, submitted by M/s Ultratech Cements Limited under Rule 24 of MCDR, 2017**

Mine Code – 38TMN38015 / Group – ‘A’ / Date of Inspection – 02/09/2021

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Text:

1. Page 11, Location & Extent of Mining Lease Area – Co-ordinates of all the boundary pillars shall be furnished here in a tabulated manner.
2. Page 14, Section 1.2, Conditions imposed by the MoEF&CC, SPCB – The SEIAA instituted by the MoEF&CC has imposed some 20 specific & 25 general conditions vide the EC. Moreover, the SPCB has also imposed a few conditions vide each of the CTOs issued. The compliance status of the said conditions shall also be furnished in this section.
3. Page 19, Table 2.c – The date, as on which the reserve/resource position stands as furnished herein, shall be mentioned atop the table.
4. Page 20, Section 2.3 – This section shall be discussed elaborately. The existing & envisaged (by the end of the approved plan period) dimensions of the pit(s) shall be furnished here. Month-wise planned excavation quantities for the remaining period of the approved plan shall also be furnished here to reflect the exhaustion of reserves before the commencement of the proposed FMCP period.
5. Page 23, Table 3.c – Item-wise break-up of proposed & achieved quantities for Mineral Rejects, Top Soil & OB/SB/IB each shall also be furnished here separately & reasons for deviations, if any, shall also be discussed item-wise.
6. Page 25, Section 3 – The review of implementation of proposals for protection of environment as tabulated in Section 8.3 (Page 89) of the ROMP with PMCP approved by IBM vide Letter No TN/ALR/LST/ROMP-1639.MDS dated 18/02/2021 shall also be provided in this section apart from the review of exploration, development & exploitation proposals, along with the reasons for deviation from the proposals, if any, with corrective measures taken.
7. Page 31, Section 4.2 – Ground Water levels during both Pre-monsoon season & Post-monsoon seasons shall be furnished in this section. It shall also be explicitly mentioned here whether the ground water table will be intersected or not. Measures for protection of contamination of ground water from leaching shall also be discussed. Quantity and quality of surface water bodies may also be indicated and corrective measures proposed to meet the water quality conforming the permissible limits may also be described. Report of hydrological study carried out in the area may also be submitted. Water Balance Chart may also be given. If there is potential of Acid Mine Drainage, the treatment method may be given.
8. Page 34, Section 4.7 – All the existing infrastructural facilities shall be listed out comprehensively and it shall be indicated against each of the facility whether it will be retained or decommissioned. It is stated in this section that the existing weighbridge will be dismantled after the final mine closure period. The same, and all other facilities, shall be proposed to be decommissioned either before or during the closure period instead of after it, as shown later on Page 41, Table 6 – Bar Chart of Abandonment Operations.

9. Page 39, Section 5.3 – Satellite occupations connected to the mining industry, number of persons engaged therein & continuance of such business(es) after mine closes shall be discussed in this section instead of repeating the details of direct occupation in the mine & the handling thereof.
10. Page 41, Table 6 – The Activity titled “Monitoring of Air” shall be replaced with “Monitoring of Environmental Parameters” & all applicable environmental parameters such as Air, Water, Soil & Noise be proposed to be periodically monitored throughout the closure period.
11. The lessee shall also include an undertaking in the enclosed Consent Letter/Certificate to the effect that “all the measures proposed in this closure plan will be implemented in a time bound manner as proposed”.
12. The Consent Letter/Undertaking/Certificate shall be signed by the nominated owner of the mine in original.
13. No proposal for reclamation, rehabilitation for each year of the FMCP period 2022-23 & 2023-24 has been provided.
14. On examination of the plates, it is found that in certain patches, the ore has not been extracted and no proposal for excavation of the same has been given.
15. Suitable reclamation & rehabilitation proposal for each year of the ensuing two years period not specified.
  - a. The extent of area to be reclaimed & rehabilitated in each year & the quantities of waste materials required for the purpose may be specified. Accordingly, the proposal for all the three blocks of the lease to be furnished. Correspondingly, changes may be made in text & plates.
  - b. The reasons for submitting the FMCP may be furnished supported by borehole data and other scientific factors.

Annexures:

16. Annexure 3 – A complete copy of the lease deed along with the FMB shall be enclosed instead of just a part of it.
17. Annexure 6 – Copies of approval letters for all the plans/schemes of this lease approved by IBM till date shall also be enclosed.
18. Annexure 10 – Experience Certificate of the Qualified Person shall also be enclosed.
19. Annexure 11 – 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.
20. Annexure 14 – Copies of Environment Testing Reports for the last four quarters, conducted by an NABL accredited agency, shall be enclosed.

Plates:

21. Soft copies of .KML files for the lease boundary & other surface features shall be provided in the CD and in email.
22. Conceptual Plan & Sections shall also be prepared & enclosed right after the Geological Plan & Sections.

Matiul Islam  
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