

Scrutiny Comments on examination of Review of Mining Plan of Pallakapalayam Limestone Mine over an area of 18.65 Ha in Pallakapalayam Villages, Komarapalayam Taluk, Namakkal District, Tamil Nadu, submitted by M/s India Cements Limited under Rule 17(1) of MCR, 2016

Mine Code – 38TMN11019 / Group – ‘A’ / Date of Inspection – 18/10/2021

Chapter 1: General Information

1. Para 1.1.1 - The 1st extension of the lease ends on 24/07/2017. No further information has been provided as to whether the lease has been extended any further or not. Further, the GO & the lease deed enclosed as Annexure also do not reflect the current position of the lease. All necessary information shall be incorporated into the document & copies of supplementary GO/Lease Deed (if any) shall also be annexed in the final copy of the document or the reasons for the lack thereof be explained.
2. Para 1.2 - The details of Khasra No 93/3 through 93/2 listed from Sl. No. 28 through 33 cannot be seen in the copy of the lease deed enclosed as annexure. Moreover, certain pages of the lease deed are found missing in the copy enclosed. A complete copy of the lease deed shall be enclosed.
3. Para 1.3.1 - Copies of all the letters of approval of the previously approved MP/SOM/ROMP/MMP as listed shall be annexed in the final copy.
4. Para 1.3.4.4. - The Total Area Acquired/Purchased & Total Amount Paid have both been mentioned here as being “Not Applicable” despite the Type of Land having been mentioned as “Private Land” against Sl. No. 1 through 29 in Para 1.2. The same shall be explained & all necessary information shall be incorporated into the document.

Chapter 2: Geology & Exploration

5. Reserve Estimation as per the last approved MP/SOM/ROMP/MMP as applicable shall be annexed as a separate annexure.
6. Para 2.2.2.13 - Copies of Bulk Density Study Report shall be annexed to substantiate the stated Bulk Density figures.
7. Paras 2.2.4.2, 2.2.4.11 & 2.2.4.12 - A Totals row shall be added in the end of both these tables showing the total volumes & quantities as applicable.

Chapter 3: Mineral Beneficiation/Processing

8. Para 3.1 - The basis for the values of Approx Mineral % & Approx. Gangue Mineral % as mentioned shall be annexed.
9. If no beneficiation/processing is proposed to be done in the lease area, the same shall be mentioned at relevant locations in the document.

Chapter 4: Mining Operations

10. All references to the individual years in all the tables in this section shall be changed from “Year 1”, “Year 2”, etc. to the actual year viz. 2022-23, 2023-24, & so on.
11. Paras 4.2.1.2.1 & 4.7.1 - Grid Values for the location of dumps shall also be provided.
12. Para 4.2.2.1 - The max bench height in overburden for Year 1 in Pit No 3 has been proposed to be 13 m which is not commensurate with the excavator proposed to be deployed. The same shall be rectified.
13. Para 4.2.2.2 - Recovery Study Report shall be annexed or the basis for assuming the same as 65% shall be furnished.
14. Paras 4.4.2.2 & 4.3.2 - The Ore to OB Ratio shall be displayed in “1:xx.xx” format as in the current format OB to Ore ratio is being shown instead.
15. Para 4.5.1 - Two types of drilling & blasting patterns have been enlisted in this table, however, the subsequent details w.r.t. “Explosive requirement per month in development” & “Powder Factor in Development” have been provided only for one drilling pattern. Moreover, in the earlier table in Para 4.4.5.3, only one make/specification of drill machine has been mentioned

instead of two as was intimated verbally during the inspection. All relevant details shall be incorporated into the document.

Chapter 5: Sustainable Mining

16. Para 5.2.2.2 - The Cumulative Area for Water Storage & Recharge facility for the 2nd year is mentioned to be the same as that for the 1st year despite additional area being proposed to be developed for the said purpose in the 2nd year as well. If the specified area is meant to be developed within the same area as earlier by deepening the existing facility, the same shall be mentioned as a remark right next to cell for the cumulative figure for the year. Likewise, if there has to be an expansion/widening of the existing facility, the same shall be indicated with proper remarks.
17. Paras 5.2.2.5 to 5.2.2.8, 5.2.3.5 to 5.2.3.5, 5.2.4.5 to 5.2.4.8 & 5.2.5.5 to 5.2.5.8 - The Cumulative no. of beneficiaries have been mentioned in these paras as being the same as the no. of beneficiaries for the year. If the same sets of beneficiaries are being supported over the years, the same shall be mentioned at relevant places, otherwise, the cumulative figure shall be rectified accordingly.

Chapter 6: Progressive Mine Closure Plan

18. Para 6.2.11 - The calculation mistake in the figure for “Area undisturbed/virgin” shall be rectified and correct figure be mentioned.

Chapter 7: Financial Assurance

19. The total area proposed to be utilized in the plan period as per the last column of the table for Year 5 stands at 11.30 Ha while the Financial Assurance has been shown only for 11 Ha. The same shall be rectified to reflect the correct Financial Assurance obligations w.r.t. the actual total area proposed to be utilized during the plan period. Moreover, the purpose for which the area categorized as “Others” in Sl No 12 for Year 5 has been listed shall be explicitly mentioned as done for the rest of the years.

Part-B:

20. The Consent Letter from the Nominated Owner shall accord the consent for submission of the document under Rule 17(1) of MCR, 2016 instead of Rule 17(3). Moreover, it is stated in the Consent that the CCOM Circular No 2/2010 is implemented while the same has not actually been done so. Necessary corrections shall be made in the Consent.
21. Certificate from the Qualified Person has not been submitted. The same shall be submitted in proper format in the final copy of the document.
22. The Consent/Undertaking/Certificate from the Applicant & the Certificate from the Qualified Person shall all be signed digitally by the concerned signatory.

Annexures:

23. Annexure 7/8 - Photo ID of the Qualified Person shall also be enclosed along with the Qualification & Experience Certificates.
24. Annexure 11 - The Borehole Litho-logs submitted in this annexure have no authenticity. At least 10% of the drilled Borehole samples shall be analysed either through a government laboratory or a third-party NABL-accredited laboratory in compliance of MEMC Rules, 2015. Moreover, the annexure enclosed is severely lacking in details w.r.t. each of the exploratory borehole.
25. Annexure 13 - The Bank Guarantees, whose copies are annexed here, are neither sufficient w.r.t. the amount required as per the financial assurance nor are their validities co-terminus with the document submitted. Proper Bank Guarantee(s), compliant in all regards, shall be submitted in original with the final document.
26. A few photographs showing land use, environmental status of the area, shall also be annexed.

27. Copies of Violation letters issued by IBM, if any, and the compliance thereof, shall also be annexed.
28. List of members of Board of Directors shall also be annexed.

Plates:

29. Apart from .kml file format, Plates No 2, 3, 5, 7, 9 & 11 shall also be given in .dwg file format as well as in .pdf format.
30. The Ultimate Pit Limit, the year-wise working area for the second year & fourth year, an adjoining lease boundary & the concerned lease boundary have been drawn using same colors in Plates 3, 5B & 5D respectively. All distinct features shall be drawn using visually distinct colors to avoid confusions.
31. The existing dumps lying beyond the lease area boundaries shall be erased from all the plates submitted with this document.
32. A Financial Assurance Plan showing only the outlines of the items under the financial assurance table at the end of 5 year plan period in different colour shall also be enclosed in .dwg/.pdf format, as well as, in hard copies along with the rest of the plates.

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