

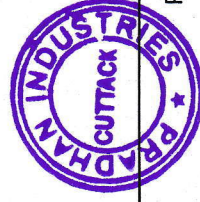
COMPLIANCE REPORT

Name of the Project : Expansion of Laxmipur Graphite Beneficiation Plant from 950 TPA to 12000 TPA at Village Katrakana in the District of Koraput of M/s. Pradhan Industries

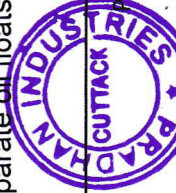
Clearance Letter No. & Date : Environmental Clearance No. 2848/SEIAA, Dtd. 21.01.2015

Period of Compliance Report : 1st December 2019 to 31st May 2020

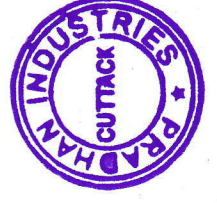
Sl. No.	Conditions by SEIAA	COMPLIANCE BY PROJECT PROPONENT
1	The raw material for the beneficiation plant is to be drawn from Bandhamandi Graphite beneficiation plant established within the mining lease area of Bandhamandi Graphite Mines of M/s. Pradhan Industries. This Environmental Clearance is subject to grant of environmental clearance to Bandhamandi Graphite Mines and beneficiation Plant by the MoEF, Govt. of India.	For Expansion of Bandhamandi Graphite Mines (Enhancement of Graphite Production from 72,000 TPA to 2,40,000 TPA) over Mine Lease Area of 73.427 Ha. & for Expansion of Graphite Beneficiation Plant from 72,000 TPA to 2,40,000 TPA (throughput) the project proponent has obtained the Environmental Clearance from MoEF, New Delhi vide letter No.: F. No. J-11015/27/2011.IA-II(M), Dtd. 29.09.2015 and the same had been complied earlier.
2	The applicant (Project proponent) will take necessary measures for prevention, control and mitigation of Air Pollution, Water Pollution, Noise Pollution and Land Pollution including solid waste management as mentioned by him in Form - I, Final EIA reports and Environment Management Plan (EMP) in compliance with the prescribed statutory norms and standards.	Steps have been initiated as proposed. Some of the measures already taken up such as ; (1) The Pulveriser have been fitted with Bag Filter to minimize the dust. The process being a wet process, generates minimal dust. The generation of dust during sun drying is controlled by having the drying platforms where the factory building all around covering the passage of air and by providing plastic net with appropriate aperture. (2) Waste Process Water have been taken to the Settling tanks, filtration tanks and treatment tanks before being recycled into the system, ensuring no discharge of waste process water or effluent to the outside system. (3) A network of Rain water drains have been constructed around the plant side and the Water is ultimately taken to the Settling Tank. The Storm / Rain water drains along the boundary on the other side of the plant have been constructed in order to chanelize Rain water from outside of the plant area to the outside drain. (4) All the rotating equipments have been well lubricated and the employees working near the ball mill have been supplied with Ear Plugs and Dust Mask has also been provided to the employees working near pulveriser section. (5) The Transportation of the Raw material, though in wet condition, are made in covered manner. Since the transportation of finished product is done in laminated HDPE Bags as well as with laminated paper bags, the dust generation during transporation is minimal and the finished product is transported in covered manner.



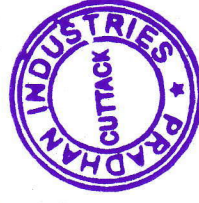
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Sl. No.			
3	The applicant will take necessary steps for socio – economic development of the people of the area on need based assessment for providing employment, education, health care, drinking water and sanitation, road and communication facilities.	The project proponent has already approved a budgetary provision for CSR Implementation in various segments as promised. The needs of the local people around the periphery in the lines provided in the CSR provisions are being taken up.	
4	The applicant will comply to the points, concern and issues raised by the people during public hearing on 15.02.2014 in accordance with the commitments made by him thereon.	The project proponent stand committed to the commitments given during Public Hearing and have already started taking steps in that regards. (1) Health awareness programme on general health have been conducted in three nearby villages. (2) The Safety of the Employees have been given due priority and periodical training have already been conducted to train them on prevention of accidents. Safety Shoes, Helmet, Goggles, Gloves, Dust Mask, Ear Plug etc., have been provided to the employees. Other safety measures are also taken up. (3) The Waste Water from the process and from the Domestic use are diverted to the Settling tanks and after settling to filtration and treatment tanks. After treatment the clean water with proper quality are being recirculated in the plant. Hence no waste process water is discharged to any outside water bodies. (4) Unskilled labourers from the local villages have already been engaged as per the need	
5	The applicant will take statutory clearance / approval / permission from the concerned authorities in respect of his project as and when required.	Agreed and noted for future guidance. All the necessary statutory and non-statutory clearances / approvals for the present plant operation have already been obtained.	
6	For post environmental clearance monitoring, the applicant will submit half yearly compliance report in respect of the stipulated terms and conditions of Environmental Clearance including results of monitored data (both in hard copies as well as by e-mail) to the State Environmental Impact Assessment Authority (SEIAA) Odisha, Regional Office of MoEF, the respective Zonal office of CPCB and the SPCB on 1 st June and 1 st December of each calendar year.	Agreed. We have been submitting half yearly compliance report regularly, and the last compliance report was submitted vide our letter No.: 112, Dtd. 28.11.2019. In the meantime we have monitored the Environment data for the Period from December 2019 to February 2020 and March 2020 to May 2020 (Copy enclosed as Annexure - 1). All parameters are found to be within CPCB norms.	
7	The effluent generated from beneficiation process shall be treated and completely recycled with make-up water in the beneficiation process.	The effluent generated from beneficiation process have been taken to the settling tanks and then to the filtration tanks. The recovered waste water is treated to maintain its pH after which the same is recirculated back to the plant through the overhead tank. The solid waste is pumped back to the tailing pond through sand pump.	
8	The overflow from tailing pond shall be treated with oil separation unit and in settling pond and reused in process. The seepage form tailing pond area shall be collected through garland / toe drain and shall be treated in settling pond and reused for dust suppression.	Agreed. The overflow of tailing pond will be pumped back to the settling tank for which a pump and its pipe line have already been installed. Oil traps are being used before pumping and as well as in the settling tank to separate oil floats.	



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9	The tailing pond shall be designed suitably with reclamation of clarified water and control of seepage water shall be provided by constructing seepage water collection ditch at the downstream side alongwith the recirculation facilities. De-silting of tailings shall be carried out periodically before onset of monsoon.	Agreed. The tailing pond design has already been made and the construction has been made accordingly. Recirculation facilities have already been installed. As and when de-silting would be done, the same would be taken up prior to monsoon.
10	Maintenance of roads through which transportation of minerals are undertaken shall be carried out by the project proponent regularly at its own cost.	Transportation of minerals to the factory and out of the factory are being undertaken on public roads.
11	The tailings from the plant shall be disposed at the earmarked site, which shall be above highest water table and adequate measures shall be taken to prevent any leaching from the disposal site into groundwater. Efforts shall also be made to gainfully utilization of tailings generated in an environmentally compatible manner.	Agreed. Appropriate tailing management practice have been adopted.
12	Fugitive dust generation shall be controlled. Fugitive dust emission shall be regularly monitored at locations of nearest human habitation (including schools and other public amenities located nearest to sources of dust generation as applicable) and records shall be submitted to the SEIAA, Odisha.	The Pulveriser have been fitted with Bag Filter / cyclones to minimize the dust. The process being a wet process, generates minimal dust. The generation of dust during sun drying is controlled by having the drying platforms where the factory building all around covering the passage of air. Plastic net with appropriate aperture is also provided to control fugitive dust during sun drying. Mechanical Dryers are being finalized to minimize the sun drying process. The fugitive dust emission is regularly monitored at 8 Nos. different suitable locations covering human habitation. The monitoring data from the period from December 2019 to February 2020 and March 2020 to May 2020 (Copy enclosed as Annexure - 1). All parameters are found to be within CPCB norms.
13	Transportation of tailings shall be done by lining the trucks so that it shall not drip and make the public road in suitable for general traffic.	The tailings are not transported through trucks but through pipe lines to the tailing pond on the adjacent land. The pipe line for transfer of tailings to the tailing pond on the other side of the plant have already been installed with due permission from the Competent Authority for crossing the road.



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14	At least four ambient air quality monitoring stations should be established in the core zone as well as in the buffer zone for RSPM (Particulate matter with size less than 10 micron i.e., PM ₁₀) and NOx monitoring. Location of the station should be decided based on the meteorological data, topographical features and frequency of monitoring and ecologically sensitive targets and frequency of monitoring should be undertaken in consultation with the State Pollution Control Board. The data so recorded should be regularly submitted to the Ministry including its Regional office located at Bhubaneswar and the State Pollution Control Board / Central Pollution Control Board once in six months. The proponent shall upload the status compliance of the stipulated EC conditions, including results of monitored data on their website and shall update the same periodically. The criteria pollutant levels namely; SPM, RSPM, NOx or critical sectoral parameters, indicated for the project shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.	One No. monitoring station in the core zone and 7 Nos. of monitoring stations in the buffer zone have been established to monitor ambient air quality. These locations have been decided based on environmentally and ecologically sensitive areas. The monitoring data from the period from December 2019 to February 2020 and March 2020 to May 2020 (Copy enclosed as Annexure - 1). All parameters are found to be within CPCB norms.
15	A green belt of adequate width and density preferably with local species along the periphery of the plant and alongside roads etc., shall be raised so as to provide protection against particulates and noise. It must be ensured that at least 33% of the total land area shall be under permanent green cover. The project proponent shall ensure proper maintenance of green belt throughout the year and for this purpose they may engage professionals in this field for creation and maintenance of the green belt. An action plan for this purpose shall be prepared accordingly and submitted to the SEIAA, Odisha.	The project proponent has already prepared an action plan for creation and maintenance of green belt and the same has earlier been submitted to SEIAA, Bhubaneswar alongwith our compliance report dated 01.06.2015. Around 30% (approx) of the total area has already been covered with green belt of the desired species all around the periphery of the plant.
16	Measures should be taken for control of noise levels below 85 dBA in the work environment. Workers engaged in operations should be provided with ear plugs / muffs.	Agreed and already implemented.
17	As part of ambient air quality monitoring during operational phase of the project, the air samples shall also be analyzed for their mineralogical composition and records maintained.	Agreed and the monitoring data from the period from December 2019 to February 2020 and March 2020 to May 2020 (Copy enclosed as Annexure - 1). All parameters are found to be within CPCB norms.



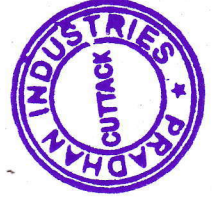
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18	Mineral handling area shall be provided with adequate number of high efficiency dust extraction system. Loading and unloading areas including all the transfer points should also have efficient dust control arrangements. These should be properly maintained and operated.	Agreed. Bag filters have been used in the pulveriser section preventing dust pollution. The raw material to the plant comes in shape of wet condition and hence there is no creation of dust at loading unloading point. However, adequate measures have been taken to control the dust at the loading point of finished product. The entire process of beneficiation being wet process there is no generation of dust except during sun drying is controlled by having the drying platforms where the factory building all around covering the passage of air. Plastic net with appropriate aperture is also provided to control fugitive dust during sun drying. Mechanical Dryers are being finalized to minimize the sun drying process.
19	Transportation of minerals shall be done by covering the trucks with tarpaulin or other suitable mechanism so that no spillage of mineral / dust takes place.	Agreed. The Transportation of the Raw material, though in wet condition, are made in covered manner. Since the transportation of finished product is done in laminated HDPE Bags as well as with laminated paper bags, the dust generation during transportation is minimal and the finished product is transported in covered manner.
20	Monitoring of ground and surface water quality shall be regularly conducted and records should be maintained and data shall be submitted regularly to the SEIAA, Odisha.	Agreed and the monitoring data from the period from December 2019 to February 2020 and March 2020 to May 2020 (Copy enclosed as Annexure - 1). All parameters are found to be within CPCB norms.
21	Provision shall be made for the housing of the labourers within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile STP, safe drinking water, medical health care, crèche etc. The housing may be in the form of temporary structures to be removed after the completion of the projects.	All the labourers are from the local area. Hence no worker stays within the plant area after attending their shift duty. However, canteen, toilets & safe drinking water facilities are being provided within the premises for workers comfort and well being.



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22	Occupational health and safety measures for the workers including identification of work related health hazards, training on malaria eradication, HIV and health effects on exposure to mineral dust etc. shall be carried out. The Proponent shall engage a full time qualified doctor who is trained in occupational health. Periodic monitoring for exposure to respirable mineral dust on the workers shall be conducted and records maintained including health records of the workers. Awareness programme for workers as well as local people on impact of mining on their health water conservation and quality sanitation and precautionary measures like use of personal equipments etc. shall be carried out periodically. Review of impact of various health measures undertaken (at interval of five years or less) shall be conducted followed by follow up action wherever required. Occupational Health Centre shall be established near the mine site itself.	There is a Government Primary Health Center 300 mtr away from the plant which will take care of day-to-day medical needs of the labourers. Moreover regular medical checkups are being conducted by a Certified Medical Practitioner. Medical checkups are planned to be undertaken periodically as recommended by Director of Factories & Boiler, Odisha. Appropriate PPEs are provided to the workers based on their work areas. Due ventilation have been provided in the work area wherever necessary.
23	The funds earmarked for the environment protection measures shall be judiciously utilized. Under no circumstances this funds shall be diverted for other purposes. Year-wise expenditure for this fund should be reported to the SEIAA, Odisha.	Agreed.
24	The project proponent shall obtain necessary prior permission of the competent authorities for drawal of requisite quantity of water required for the project.	Necessary Permission has been obtained for drawal of surface water vide letter No. 5936, Dtd. 15.10.2018 of Executive Engineer, U.K. Head Works Division, Kolabnagar. Its copy has already been submitted earlier..
25	The project proponent shall prepare wild life conservation plan in consultation with DFO and adequate safety and mitigation measures should be incorporated to protect the wild life, flora, fauna to mitigate adverse impact.	The approved Wild Life Conservation Plan has earlier been submitted earlier.
26	Rainwater harvesting should be adopted. Central Ground water Authority / Board shall be consulted for finalization of appropriate rainwater harvesting technology within a period of three months from the date of clearance and details shall be furnished to the SEIAA, Odisha.	The Plant does not use ground water. However a Rain Water Harvesting Plan has been prepared by the project proponent with due consultation with Technical Personnel on the subject and steps are being taken for its implementation.



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27	The Project Proponent should ensure advertising in at least two local news papers widely circulated in the region, one of which shall be in vernacular language informing the Public that, the project has been accorded environment clearance and copies of the clearance letters are available with SEIAA, Odisha and the Odisha State Pollution Control Board (OSPCB) and may also be seen on the website of the board. The advertisement shall be made within 7 (seven) days from the date of issue of the environmental clearance and a copy of the same should be forwarded to the Regional Office of MoEF, Bhubaneswar.	Already Complied.
28	A copy of the clearance letter shall be sent by the proponent to concerned Panchayat, Zila Parisad / Municipal Corporation, urban local Body and the Local NGO, if any, from whom suggestions / representations, if any, received while processing the proposal. The clearance letter shall also be put on the website of the Company by the proponent.	Already Complied.
29	The environment statement for each financial year ending 31 st March in Form - V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Regional Offices of the Ministry by E-mail.	The Project Proponent has submitted the environment statement for the financial year 2019-20 in Form - V to OSPCB, Bhubaneswar with copy mark to Regional Officer, SPCB, Rayagada vide letter No.PI/MC/SPCB-06/264/2020, Dtd. 15.05.2020. It is already hoisted in our website. (Copy attached as Annexure - 2)
30	Any appeal against this environmental clearance shall lie with the National Green Tribunal, if preferred, within a period of 30 days as prescribed under section 16 of the National Green Tribunal Act, 2010.	There is No appeal against this environmental clearance till date to the best of our knowledge.



For M/s. PRADHAN INDUSTRIES

(Signature)
(SUNANDAN PRADHAN)
PARTNER