



Gondegaon mine <gondegaonwcl@gmail.com>

WCL_Gondegaon OCM_Reply in respect of Show Cause Notice under the provisions of Water (P&CP) act, 1974 and Air (P&CP),1981 for refusal of renewal of consent to operate.

Gondegaon mine <gondegaonwcl@gmail.com>

Mon, May 15, 2023 at 6:37 PM

To: jdwater@mpcb.gov.in

Cc: ms@mpcb.gov.in, cac-cell@mpcb.gov.in, ronagpur@mpcb.gov.in, agmnagpur@westerncoal.gov.in, sronagpur1@mpcb.gov.in, soenvwclna@gmail.com, Manager gocm <gocmmanager@gmail.com>, Portal Support <portalsupport@mpcb.gov.in>, rbthakre@coalindia.in, managergocm@gmail.com, akshay81194@gmail.com

प्रति,

डॉ. जे.बी. संगवार/Dr. J.B. Sangewar,
संयुक्त निदेशक (डब्ल्यूपीसी)/Joint Director (WPC),
महाराष्ट्र प्रदूषण नियंत्रण बोर्ड/Maharashtra Pollution Control Board,
कल्पतरु पॉइंट, दूसरी-चौथी मंजिल/Kalpataru Point, 2nd -4th Floor,
विपक्षा सिने प्लैनेट सिनेमा/Opp. Cine Planet Cinema,
सायन सर्कल के पास, सायन (पूर्व)/Near Sion Circle, Sion (E),
मुंबई - 400 022/Mumbai - 400 022.

विषय: **Show Cause Notice under the provisions of Water (P&CP) act, 1974 and Air (P&CP),1981 for refusal of renewal of consent to operate.**

- संदर्भ: 1. Application for renewal of consent vide UAN No. 0000161990.
2. Minutes of Consent Appraisal Committee meeting held on 24.04.2023.
3. Show Cause Notice no.2305110002 dated 11.05.2023 from your office.

महोदय,

Greetings of the Day!

In compliance with the observations stated in show cause under reference (3) concerning the subject matter (**Annex-1**), please find the point wise compliance status/details stated as below:

Point no. 1: You have not provided a Sewage Treatment Plant for treatment of domestic effluent-432 CMD.

Status: Compliance is in progress.

As per the current requirement, PP has issued a work order for Surveying, Planning, Design, Construction, Installation, and commissioning of 250 KLD STP based on MBBR Technology including trial run, operation with maintenance of STP for coming 5 years at Gondegaon OC Township of Nagpur Area on Turnkey basis to M/S Pristine Solution Pvt. Ltd., Nagpur vide No. 816 dated 28.10.2022 for amount of Rs. 53 lakhs and it is expected that work will be completed latest by July, 2023.

(Annex-2, Work order for STP)

It is also to be mentioned here that, at present, clusters of soak pits and septic tanks are provided in the existing residential colony and working satisfactorily. A copy of the third party (certified by MOEF&CC and NABL accredited) analysis report of the same is attached for your ready reference.

(Annex-3, Sewage analysis report)

Point no. 2: You have not provided air pollution control systems at the sand segregation plant's jaw crusher, primary and secondary crusher.

Status: Compiled.

In this context, it is submitted that said plant is not in operation since April 2021 due to some litigation related issues and there is no pollution load from plant since April 2021 onwards and does not attract any PCM at present. Still, to comply with MPCB's directive, PP has deployed the below mentioned air pollution control systems at the said plant.

- A) 1 no. of truck mounted mist cannon system having capacity to throw 50 mtrs.
- B) Metal sheet barricading along the periphery of the sand segregation plant.
- C) Deployment of the mist canon systems is under installation and commissioning at site.

(Annex-4, Photos of truck mounted mist canon, newly deployed mist canons, metal sheet barricading)

(Annex-5, Proposal letter for termination of Sand plant)

Point no. 3: You have not provided a Tyre washing system at mine entry and exit.

Status: Compliance is in progress.

In this regard, it is submitted that PP has already awarded a work order for installation and commission of Tyre washing system at mine entry and exit point for an amount of Rs. 28.69 lakhs with a completion period of 120 days and expected to be completed latest by October 2023. In addition to that, PP has submitted a bank guarantee of Rs. 5 lakhs to the MPCB for ensuring the compliance.

(Annex-6, Work order of the tyre wash system)

(Annex-7, Bank guarantee of Rs. 5 lakhs)

Point no. 4: You have not provided Mechanized sweeping machines for dust cleaning on the road.

Status: Compiled.

Automatic Road Sweeping machine with water jet spraying arrangement vide bearing no. MH-40-AK-5733 amounting 35.52 Lakhs has been deployed since 04/07/2016 and the same is regularly maintained and in operation. Photos are attached.

(Annex-8, Photos of Mechanized sweeping machines)

Point no. 5: Toppers/binders are not used on the top surface of coal piles in trucks carrying coal on road to minimize spillage during transportation.

Status: Compiled.

All the trucks carrying coal outside the mine premises are optimally loaded & properly covered by good quality tarpaulin to avoid spillage, pilferage, crushing and dust generation during transportation before leaving the mine premises and it is being monitored by CCTV cameras installed at exit points of the mine.

(Annex-9, Photos of Tarpaulin covered trucks)

Point no. 6: Internal roads of 3 km (approx.) are not concrete / black topped.

Status: Compiled.

At present, total internal roads of approximate 2.7 km of length have already been concretized at project i.e. 1.3 km from CHP to check post and 1.4 km from coal stock no. 4 to CHP at the project.

Further, Tender floated from WCL HQ for 1.4 km road from coal stock number 4 to CHP and work order for the same will be awarded very soon.

Additionally, another road of approx. 7.9 km black topped/tar road from Gondegaon OC project up to NH 44 (Expenditure for amount of Rs. 5.45 Cr) has been completed with a thick bamboo plantation (3-tier avenue plantation) along the both sides of the road to mitigate dust pollution in and around the vicinity of the project.

(Annex-10, Geotagged photos of internal concretized and black topped roads with 3-tier avenue plantation)

Point no. 7: You have not submitted the valid renewal NOC of CGWA.

Status: Compliance in progress.

In this regard, it is submitted that project proponent has applied for renewal of NOC within stipulated time frame whereas CGWA directed to resubmit the application for renewal only after submission of the Impact Assessment Report with Modelling from CGWA accredited consultant for the said project latest by March 2022. The same has been submitted to the CGWA along with revised application within given time frame and after that application has been recommended by Regional Office of CGWB, Nagpur for approval of renewal of NOC and at present, it is in process for issue of the formal

NOC (Renewal) by CGWA, New Delhi. A copy of the latest online status downloaded from CGWA web portal is attached for your ready reference.

(Annex-11, online status downloaded from CGWA web portal)

Point no. 8: You have not submitted the BG of Rs. 107 Lakh, as per previous consent conditions.

Status: Compiled.

Project proponent has submitted following bank guarantees in respect of the applicable conditions:

1. Rs. 10 lacs for installation and commissioning of STP.
2. Rs. 10 lacs for deployment of the mist canon systems at Project.
3. Rs. 5 lacs for installation and commissioning of tyre wash system.

Additionally, project proponent is ensuring compliance w.r.t. the other conditions stipulated in the BG Regime. A copy of the pointwise compliance status is attached.

(Annex-12, Aforesaid bank guarantees)

(Annex-13, Pointwise compliance status w.r.t bank guarantees)

Point no. 9: You have not installed permanent 10 nos. of fog cannon for reducing dust emission in sand segregation plant, haul road, OB dump area during unloading.

Status: Compiled.

As directed, PP has procured 10 nos. of fog cannons and vendor has supplied the same to the project and at present their deployment along with installation and commissioning in the mine is in progress and expected to be completed by June 2023 (02 nos. already deployed) . A copy of the supply order along with geotagged photos is attached.

(Annex-14, Supply order along with geotagged photos).

Meanwhile, a truck mounted mist cannon type mist system has been deployed at the project since 28/02/2020 to control the dust emission by generating mist with 50-meter throw and CHP is fitted with mist spray systems also.

(Annex-15, Photos of truck mounted mist canon type mist system)

(Annex-16, Photos of mist spray system at CHP)

Additionally, it is also to inform you here that presently the sand segregation plant is not in operation since March 18, 2021 and is under arbitration at Nagpur High Court and because of that there is no pollution load on part of the sand plant.

Point no. 10: You have constructed at least 10 mts height metal sheet barricading along the periphery of the sand segregation plant.

Status: Compiled.

As directed, PP has already mounted metal sheet barricading around the periphery of the sand segregation plant in October 2022.

(Annex-17, Geotagged photos of metal sheet barricading)

Additionally, it is also to inform you here that presently the sand segregation plant is not in operation since March 18, 2021 as it is under arbitration at Nagpur High Court and because of that there is no pollution load on part of the sand plant.

Point no. 11: Coal transportation is not shifted from road — rail to Pipe Conveyor system. (Target date for provided Pipe conveyor system is at the end of 2023 and after that no coal will be transported by road transportation)

Status: Compliance is in progress.

At present, MAHAGENCO has commissioned the said system from Bhanegaon Opencast Mine for coal transportation through the belt and expected the same from Singhori OCM latest by September 2023 and as per MAHAGENCO's officials, it is expected that pipe conveyor belt system for transportation of coal from Gondegaon OCM is expected to be completed on or before December 2023.

In this regard, it is to inform you here that installation and commissioning of the Pipe Conveyor Belt System is totally under the prerogative of the Management of the MAHAGENCO, Nagpur although WCL Management is also in constant touch with MAHAGENCO officials.

Some photos showing the latest status related to installation and commissioning of the pipe conveyor system are attached as Annexure 17 for your reference.

In view of the above, we most earnestly request your good office to kindly revoke the Show Cause Notice for refusal of the consent towards non-compliance of the consent with a request to grant for renewal of CTO for 3.50 MTPA including sand segregation plant, so that the Coal mining activities can be carried out un-hindered with due care to environment & simultaneously meeting the energy demand of the state of Maharashtra in particular and the Nation as a whole.

Encl: As above

Yours faithfully

Applicant: General Manager (Mining) /Sub Area Manager,

Gondegaon Sub Area, Nagpur Area

Western Coalfields Limited, Nagpur

प्रतिलिपि: for kind information please

- 1. The Member Secretary, MPCB, Mumbai**
- 2. CAC Cell, MPCB, Mumbai**
- 3. Regional Officer, MPCB- Udyog Bhawan-Nagpur.**
- 4. Sub Regional Officer, MPCB, Nagpur-1, Udyog Bhawan-Nagpur.**
- 5. Area General Manager, Nagpur Area**
- 6. Area Nodal Officer Env, Nagpur Area**
- 7. Concerned file.**

 [Annex-1_SCN_GOCM_dated 11052023.pdf](#)

 [Annex-2, Work order for STP.pdf](#)

 [Annex-3, Sewage analysis report.pdf](#)

 [Annex-4, Photos of truck mounted mist canon, me...](#)

 [Annex-5, Proposal letter for termination of San...](#)

 [Annex-6, Work order of the tyre wash system.pdf](#)

 [Annex-7, Bank guarantee of Rs. 5 lakhs.pdf](#)

 [Annex-8, Photos of Mechanized sweeping machines...](#)

 [Annex-9, Photos of Tarpaulin covered trucks.pdf](#)

 [Annex-10, Geotagged photos of internal concreti...](#)

 [Annex-11, online status downloaded from CGWA we...](#)

 **Annex-12, All submitted bank guarantees.pdf**

 **Annex-13, Pointwise compliance status w.r.t ban...**

 **Annex-14, Supply order along with geotagged pho...**

 **Annex-15, Photos of truck mounted mist canon ty...**

 **Annex-16, Photos of mist spray system at CHP.pdf**

 **Annex-17, Geotagged photos of metal sheet barri...**



Letter no 886 dated_reply SCN_11052023_WCL_Gondegaon OCM.pdf
1594K