

**Investigation into Alleged Environmental Violations by Central
Coalfields Ltd in Rohini OCP:**

**Report of Committee appointed by Hon'ble National Green
Tribunal in**

***Sanjay Chauhan vs CCL & Ors (OA No. 27/2020/EZ) vide order
dt.11.05.2020***

Date of submission: 14 September 2020

1. INTRODUCTION

The North Karanpura coal belt in Jharkhand state straddles the districts of Ranchi, Chatra and Hazaribagh and contains a large number of coal mines of various vintages and size, as well as some coal washeries and thermal power plants. In spite of the existence of multiple environmental regulations, there has been repeated public concern at the extent of environmental pollution in this region.

The Hon'ble National Green Tribunal is currently hearing a case (OA No. 27/2020/EZ) in which the petitioner (Sanjay Chauhan, a resident of Dakra village of Ranchi district) has complained of non-compliance of environmental clearance (EC) conditions in the case of Rohini Opencast Coal Mining Project (OCP) of M/s Central Coalfields Ltd.

The Tribunal, vide its order dt.11.05.2020 constituted a 4-person committee to verify the factual position on the ground. The committee consisted of:

1. Dr. Sharachchandra Lele (Distinguished Fellow in Environmental Policy & Governance, ATREE, Bengaluru)
2. Dr. Hemen Hazarika (Scientist D, representing Ministry of Environment, Forests and Climate Change (MOEFCC), Regional Office, Ranchi)
3. Dr. G. P. Singh (Scientist D, representing Central Pollution Control Board (CPCB), Regional Office, Kolkata), and
4. Shri. R. N. Kashyap (Regional Officer, Ranchi, representing Jharkhand State Pollution Control Board (JSPCB), which acted as the Nodal Agency).

Due to the COVID-19 pandemic and the consequent restrictions on travel, the committee's field visit was delayed, and the committee requested and was granted time till 16th September 2020 to

submit its report. The committee conducted its visit to Rohini Opencast Coal Mining on 2nd September 2020. This report presents the findings emerging observations made and discussions held with the petitioner and the respondent during the field visit, and perusal of related documents by the committee. We begin with a brief description of the coal mining project. We then summarise key points that emerged from recent inspection reports and/or notices issued by MOEFCC and JSPCB, followed by our own field observations. Where we have observed significant non-compliance, we have given our estimates of the duration of non-compliance, and also added recommendations for how remediation may be carried for the immediate future. We end with a wider observation of the environmental trajectory of the region.

2. BASIC INFORMATION REGARDING THE ROHINI OCP

Rohini Opencast Coal Mining Project (OCP) of M/s. Central Coalfield Limited became operational in 1991 with a sanctioned (normative) capacity of 0.8 MTPA in an area of 255.68 ha located in Burmu Block of Ranchi district, Jharkhand. The project is located just south of Damodar River (see Figure 1). The project was expanded to a (normative) capacity of 2.0MTPA in October 2009 (vide EC dt. 05.10.2009.) and subsequently was further expanded to 3.0 MTPA capacity (normative) in Feb 2017 (vide EC dt. 21.02.2017).

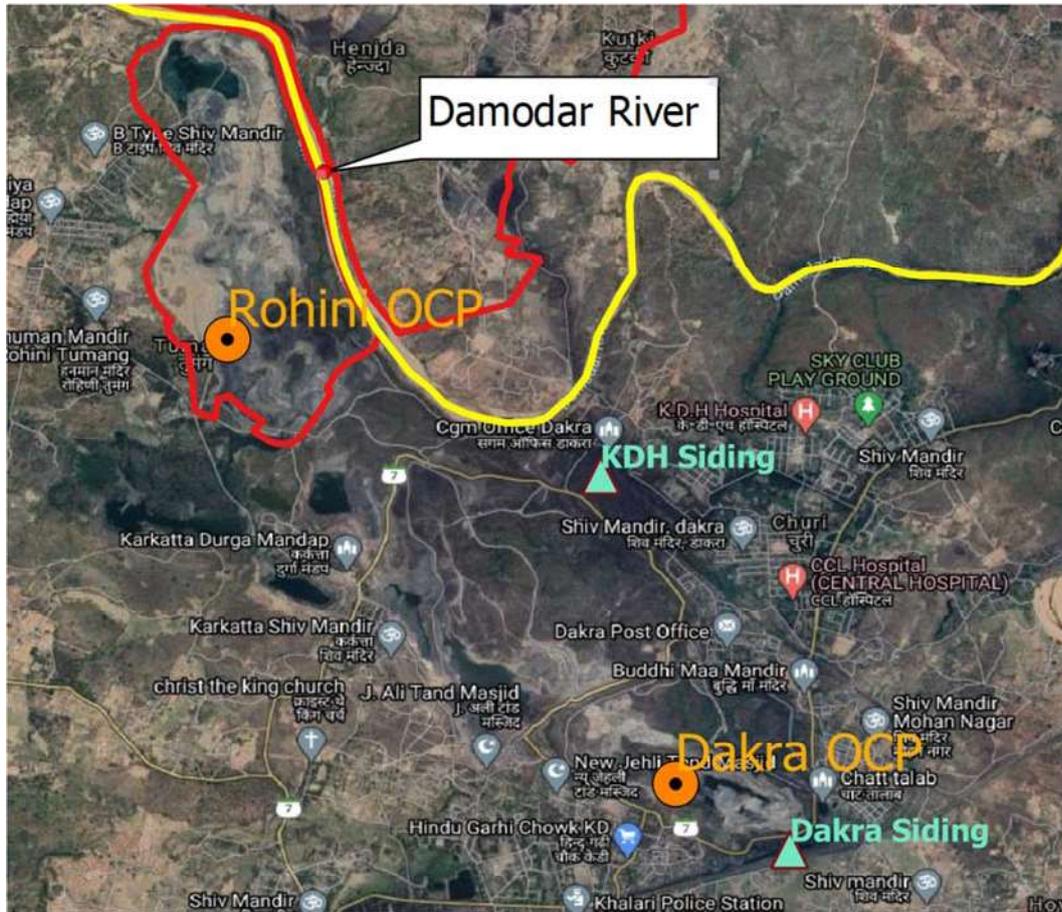


Figure 1. Location of Rohini OCP on the bank of the Damodar River, and of Dakra Siding used to despatch coal from this mine

3. SUMMARY OF MOEFCC AND JSPCB REPORTS PRIOR TO THE NGT COMMITTEE'S FIELD VISIT

The MOEFCC's Regional Office Ranchi had submitted a monitoring report dt. 19.09.2019 in which various instances of non-compliance and partial compliance with EC conditions were noted. Based on this report, Ministry issued show cause notice (vide letter no. J-11013/27/2020-IA-I(M) dated 8th July 2020) under section 5 of Environment (Protection) Act for non-compliance of certain EC conditions (Annexure-1).

Jharkhand State Pollution Control Board issued two times show cause notice vide memo no.B-88 dated 21.01.2019 and D-77 dated 01.02.2019 (Annexure-2).

4. OBSERVATIONS REGARDING CURRENT NON-COMPLIANCE AND RECOMMENDATIONS FOR THE FUTURE

4.1 Construction of Coal Handling Plant

Petitioner's allegation: no. (1): *The petitioner alleges that (a). Construction of a Coal Handling Plant (CHP) has not been carried out, in violation of Specific Condition No. (x) & (xviii) of the environmental clearance dated 05.10.2009 and Specific Conditions No. (xi) of the environmental clearance dated 21.02.2017.*

Requirement as per the EC conditions:

At the outset, it may be noted that EC dt.21.02.17 does not contain any "Specific Condition (xi)" at all. There are only 9 specific conditions in the EC. Further, although there is a mention of CHP in General Condition C(xi) of this EC, but that is generic in nature, viz., that all industrial wastewater (whether emanating from CHP, workshop, or elsewhere) shall be properly collected and treated. Similarly, the Specific Condition (xviii) of EC dt.05.01.2009 is also generic in nature, viz., that effluents from workshop and CHP (if they exist), should be treated in an Effluent Treatment Plant. Specific Condition (x) of the 2009 EC also is focused on the need to check fugitive dust emissions at all transfer points and haulage roads using sprinklers, in which CHP is simply mentioned as another location.

Further, the original proposal (for which EC was issued on 05.10.2009) as well as the expansion proposal (for which EC was issued on 21.02.2017) contain no proposal for a CHP-cum-dedicated siding. Indeed, the preliminary text in the EC of 2009 clearly mentions "Mineral transportation of 5500 TPD of coal is by road up to railway siding ...covering a distance of 5km".

Similarly, the Addendum EIA/EMP report submitted at the time of applying for expansion clearly mentions that ‘presently’ coal is sent by truck to the KDH siding and that “the same system will continue” (pt 2.09 of Addendum EIA/EMP) , i.e., coal would be transported by road to the nearby KDH railway siding. Although there is a vague mention of ‘coal handling plant’ in pt. 3(xvii) of the Project Description in the EC of 2017, we interpret that (when read in conjunction with the Addendum EIA/EMP) to simply mean a pit-head crusher/feeder-breaker to be used prior to loading the dumpers to send the coal to the KDH railway siding (pt.2.1 Coal Winning in the Addendum EIA/EMP).

Observations by this Committee:

1. Since there is no EC condition requiring a CHP-cum-dedicated siding within the mining area, **as such there no non-compliance in this regard.**
2. However, while the expansion EIA/EMP (for which EC dt. 21.02.2017 was issued) mentions that coal transport by road **will take place to the KDH siding**, in the field it was observed that the coal from Rohini OCP was being taken by road to the Dakra siding, which is an addition 2.5 km distance (see Figure 1).
3. Furthermore, the road from mining area to coal unloading area is not in full compliance with EC conditions. Although a metaled road has been constructed, the road was still covered with dust/mud (see Figure 2), indicating spillage from trucks, due to which nearby habitat area may face dust pollution during the dry season. The main haulage road in the mine does not have fixed water sprinkler arrangements. The existing system is inadequate and sparse not covering the entire area. Nor has a “3-tier green belt comprising a mix of native species” been “developed all along the major approach roads”, as required by General Condition C(iv) and specific condition (ix) of the EC dt. 05.10.2009.



Figure 2. Status of roads being used for transport of coal from mine to siding: coal spillage, missing fixed sprinklers, no 3-tier roadside plantation

4. **Finally, the Dakra siding is only in partial compliance with the CPCB guidelines regarding coal sidings.** In particular, the windscreens are temporary and collapsing, a thick layer of coal is piled up on the platform, and the surface runoff from the siding is poorly handled (the drain is broken and the polluted runoff is not contained within the settling tank) (see Figure 3). Project proponent has not developed either thick 3-tiered plantation or adequate wind barrier to control the fugitive dust from the railway siding in the direction of the residential area.



Figure 3. Status of Dakra siding: coal piled up on platform (left), inadequate containment of runoff (right)

4.2 Construction of Conveyor Belt

Petitioner's allegation: no. (2).

The petitioner alleges that the construction of a Conveyor Belt has not been carried out, in violation of the General Condition No. c(vi) in the environmental clearance dated 21.02.2017.

Requirement as per the EC conditions:

General EC conditions are generic conditions, applicable on an “if and when” basis. So, the statement “Belt-conveyors should be fully covered to avoid air borne dust” (General Condition C(vi)) implies that **if and when** belt-conveyors are used, they should be fully covered. The preamble in the 2017 EC clearly acknowledges that “Coal transportation by dumpers from in-pit to pithead”. **As such, there is no EC condition requiring use of belt-conveyors.** However, the EC Specific Condition (xvii) does mention a pithead Coal handling Plant (presumably for crushing the coal before loading the trucks, as mentioned above.)

Observations by this Committee:

Crushing is not happening at the pithead. At the project site, one non-operational feeder breakers was observed (Figure 4-left). Instead, two feeder breakers were installed in the Dakra

railway siding fixed with water sprinklers arrangement (Figure 4-right). **This constitutes a deviation from EC conditions, and it adds to the pollution load at the siding, which is located next to a state highway and to a residential colony.**



Figure 4. Dismantled feeder breaker (crusher) at the mine site (left), operational feeder breaker at the siding (right)

4.3 Development of Green Belt

Petitioner’s allegation: no. (3):

The petitioner has alleged that the development of green belt in and around the mine site is completely inadequate, in violation of the (specific conditions No. (ix) of the EC dt. 05.10.2009 and also General Condition b(v) of the EC dated 21.02.2017.

Requirement as per the EC conditions:

In the EC of 2017, Specific Condition (vii) requires a Green Belt of 5 ha, plantation in the township, and along roads. As per the general condition b(v), “Plantation shall be raised in a 7.5m wide green belt in the safety zone around the mining lease, backfilled and reclaimed area, around water body, along the roads etc. The density of the trees should be around 2500 plants per ha. Greenbelt shall be developed all along the mine lease area in a phased manner and shall be completed within first five years.”

Observations by this Committee:

The total land area of Rohini OCP is 255.68 ha and as per approved mining plan, the quarry is 204.05 ha, out of which till date about 202 ha land has been broken. 153 ha of land have been technically reclaimed and out of which plantation in 97 ha of land has been completed. About 30 ha land has been partially reclaimed. The north and east side boundary of the mine has 25 m high and more than 80m wide embankment for the length of about 2.3 km. This embankment has a dense plantation. Details of plantation work done, in collaboration with the Forest Department, as provided by the project proponent, are given in Table 1 below.

Table 1. Details of plantation work carried out at Rohini OCP

Year of Plantation	Area in Ha	Category of Land	No. of Plants	Main species
1994-95	11.00	OB dump	27500	Acacia, Gamhar, seashamsubbabul, Karanj, Kathasagwan, Chakundi, Eucalyptus, Ber, Amla, Emli, Babul, Bamboo, Menzium, etc.
2000-01	18.00		45000	
2003-04	9.00		22500	
2005-06	5.00		12500	
2006-07	8.00		20000	
2007-08	13.00		32500	
2008-09	14.00		35000	
2012-13	4.00		10000	
2016-17	4.00		10000	
2017-18	15.00		37500	
Total	97.00		2,42,000	

However, while these large plantations have been created on the OB dump, **development of plantation of 7.5m wide greenbelt in around the mining lease area has not been completed** (see Figure 5-right), **despite lapse of long period after commencement of the coal extraction and despite attention being drawn to it in the MOEFCC Ranchi office's monitoring report of 18.09.2019**. Similarly, as already mentioned earlier, 3-tier green belts have not yet been completely developed on the road side, railway siding and coal stockyard where neighbouring

areas were likely to be affected by dust pollution during the dry season and water pollution during the wet season.

Furthermore, it was observed that some part of the backfilling area plantation developed with monotypic species (*Acacia sp.*) (see Figure 5, left) which do not support rehabilitation of the ecosystem with appropriate biodiversity. The project authority should emphasize creation of plantation with variety of native species of trees, shrubs and grasses.



Figure 5. Dense plantations on backfilled area, but with single exotic species (left); No 7.5m green belt around mining area (right)

4.4 Ambient Air Quality Monitoring

Petitioner's allegation: no. (4)

The petitioner has alleged that an ambient air quality monitoring system has not been developed, in violation of General Condition No. (xv) of the EC dt. 05.10.2009 and General Condition No. C(ii) of the EC dt. 21.02.2017. The air quality monitoring system was to be set up within 3 months from the grant of the EC, but the same has still not been carried out even after more than 11 years have passed.

Requirement as per the EC conditions:

As General Condition (iii) of EC of 2006 and C(ii) of EC of 2017, “four ambient air quality-monitoring stations should be established in the core zone as well as in the buffer zone” and the data on critical pollutants such as SPM, RPM, SO₂ and NO_x are also be displayed at the entrance of the project premises and mines office and in corporate and on the company’s website. As per the EC of 2017, the display system of AAQ data was to come up within 3 months.

Observations by this Committee:

1. As per the submitted data by project proponent to the Committee, and as also observed from the MOEFCC’s monitoring report of 18.09.2019, ambient air quality is being periodically monitored by CMPDI at the locations of North Karanpura Project Office, Intake well pump, Ashok Vihar Colony and Workshop for PM₁₀₊, PM₁₀, PM_{2.5}, SO₂, NO_x, and heavy metal concentrations. Project authority has submitted ambient air monitoring data of project site for the period of January to March in the year 2019-2020. **As such, air quality monitoring is being carried out as per EC conditions.**

2. The data provided indicate that most of the parameters are within the prescribed limit. However, **the concentrations of Lead, however, range (3.54 to 3.96µg/m³), which was found beyond the limit. It may also be noted that a) MOEFCC’s monitoring report of 18.09.2019 mentioned that the values of PM₁₀ and PM_{2.5} measured by CMPDI were near the prescribed limit, and b) JSPCB had issued two show-cause notices in early 2019 to the project authorities based on ambient air quality measurements taken by a private (NABL-accredited) laboratory on behalf of a third party, showing extremely high pollution levels (PM₁₀ > 480 µg/m³ and PM_{2.5} > 190 µg/m³) at the Dakra siding.**

3. **The pollutant levels AAQ (ambient air quality) data has not been shown / installed in the digital display board** or other manual board at a convenient location near the main gate of the mining project office or in the public domain in the project site or railway siding area.

4.5 Prevention of surface runoff of silt and coal dust

Petitioner's allegation: no. (5)

The petitioner has alleged that measures for effective management of water resources and the prevention of surface runoff has also not been carried out in violation of Specific Conditions No. (vi), (vii) and (viii) of the EC of 2009 and General Condition No. c(x) of the environmental clearance dated 21.02.2017.

Requirement as per the EC conditions:

The Specific and General EC conditions (including those mentioned by the petitioner) indeed **require a variety of measures to prevent runoff** from the OB dumps, coal heaps and other areas from reaching directly into the river and other water bodies. Apart from plantations and green belts, they specify the construction of catch drains and siltation ponds, toe walls and retaining walls, etc.

Observations by this Committee:

- 1) The greatest potential risk to the Damodar River is posed by the embankment/OB dump on the north-eastern boundary of Rohini OCP. Along most of this boundary, the OB dump/embankment has been planted up many years ago and has a dense vegetation cover. However, at one location where the river is closest to the road inside the mine, there is a

major gap (like a road created to reach the river: see Figure 6-left). As a result, coal dust from the road is flowing towards the river (Figure 6-right).



Figure 6. Major gap in the embankment separating Rohini OCP from Damodar river (left), resulting in coal dust from road flowing towards the river (right).

- 2) At the project site it was observed that constructed sedimentation pond, catch drains and siltation ponds were not connected with entire drainage system of the mining area.
- 3) It was also observed that nearby constructed sedimentation pond it has not been constructed embankment and retaining wall to prevent silt and sediments. Project proponent should be taken proper precautionary measure at the earliest.
- 4) The problem with poor control of polluted runoff at Dakra siding has already been pointed out earlier.

4.6 Summary observations and recommendations

Rohini OCP is one of the older mines in the North Karanpura coal belt. It did not plan to have an integrated conveyor belt-CHP-siding system, and was permitted to transport coal by road to the

nearest railway siding, which is less than 5km away, with most of the road going through the mine lease area (and therefore somewhat distant from human habitation). The mine has undertaken a substantial area of plantations on its OB dumps in the early years. Nevertheless, several areas of non-compliance with EC conditions remain. In particular, **transport to the Dakra siding and the management of coal dust at the Dakra siding are not meeting the relevant EC conditions, green belt development around along roadsides is missing. Ambient air quality monitoring reveals high levels of lead, and occasionally high to very high levels of particulate matter, which is a matter of concern, and the non-display of the results of air and water quality monitoring to the public is a deviation from EC conditions. It is also clear that these non-compliances have been occurring for many years.**

There is an overall policy issue that needs to be highlighted. The focus of EC conditions is on various measures to be adopted towards pollution control (transport by rail, creation of green belts, use of sprinklers, creation of catch drains, etc.). But the only way to know whether these measures are having the desired outcomes is to carry out **frequent and continuous monitoring of ambient environmental conditions at multiple locations most relevant to public health and ecosystem impacts.** Currently, air and water quality, groundwater levels, are required to be monitored in just 4-5 locations. Several of these locations are within the mine lease area, where the pollution levels permitted are also higher. For instance, the standard for PM₁₀ in ambient air inside the mine lease area is 300 µg/m³ for Karanpura coal belt as per EPA Rules 1986, whereas the NAAQ standard for residential areas is 100 µg/ m³. Data submitted by the petitioner to this Committee, of 24-hour AAQ measurements done at 5 public locations in the Dakra area by a NABL-accredited lab, indicate very high levels of PM₁₀ (>300 µg/m³) and PM_{2.5} (>150 µg/m³) when the standard is 100 and 60 respectively (see Annexure 2)! One of these monitoring sites was the Mohannagar colony

right next to Dakra railway siding. No such data are available publicly from any other independent source as a cross-check. This gap in ambient environmental quality monitoring and linking it to enforcement needs to be addressed urgently at a policy level.

5. THE LARGER ENVIRONMENTAL CHALLENGE IN THE NORTH KARANPURA COAL MINE BELT

As the map in Figure 7 shows, the North Karanpura region has a large number of coal deposits, and even though some old mines are supposedly reaching the end of their lives (such as Piparwar OCP), mining activity is likely to expand very significantly in the coming years with the opening of new large mines (e.g., Sanghamitra OCP, Ashoka West OCP, and Piparwar Expansion OCP). Equally important, attracted by the coal deposits, the region is seeing an expansion in coal-based thermal power plants (TPPs). The 2400 MW Tandwa TPP by NTPC is about to be commissioned, and several TPPs are planned in a 25km radius of Dakra.

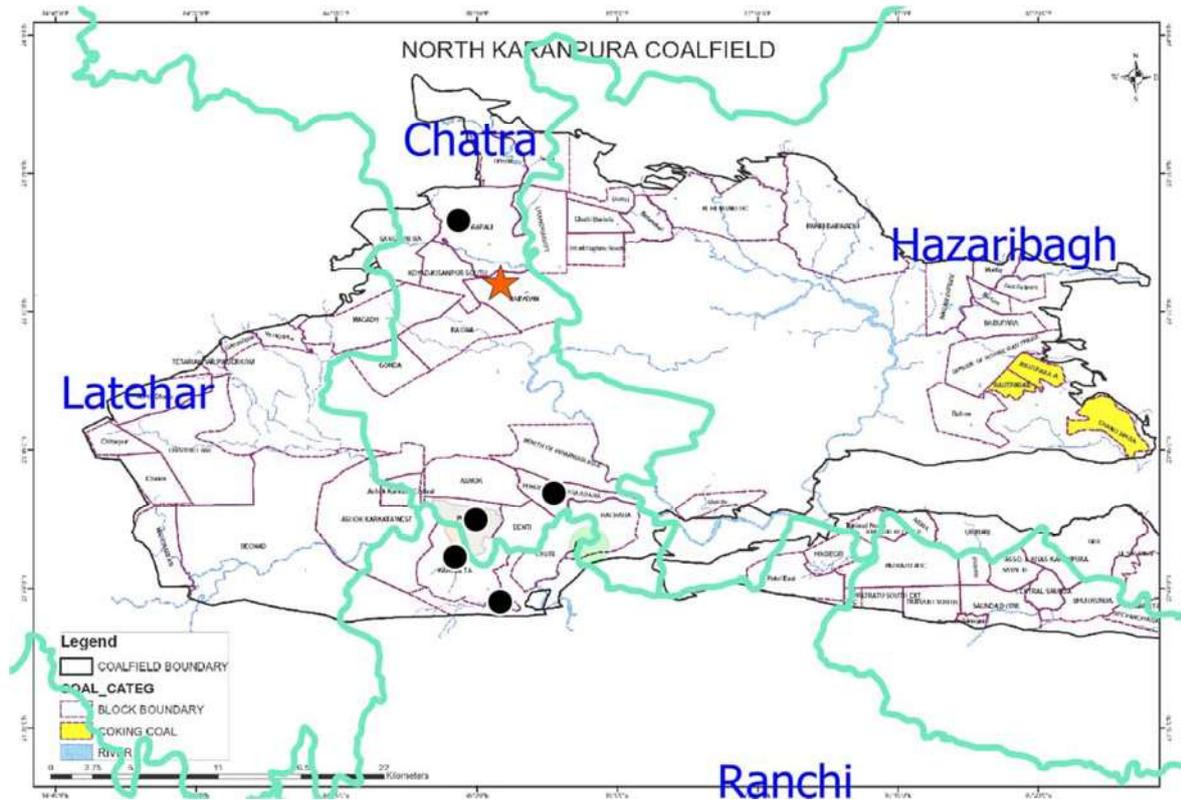


Figure 7. Overview of North Karanpura Coal field region. Black dots indicate the mines of Amrapali (northernmost dot), and Piparwar, Purnadih, Rohini and Dakra; red star indicates Tandwa TPP. Green lines indicate district boundaries and blue lines indicate rivers.

The **cumulative environmental impacts of these developments** cannot be understood through individual EIAs or investigations of individual projects. In particular, coal transport occurs outside project premises on public roads or via common railway sidings used by multiple projects. Similarly, in a region rich in rivers, the impact of cumulative forest loss and mining activity on rivers and groundwater hydrology can only be understood at the catchment or sub-basin scale. The public health and socio-economic impacts of such large-scale mining and TPP activity again will be non-linear and complex.

Experience from elsewhere, such as Dhanbad (Jharkhand), Singrauli (Madhya Pradesh/Uttar Pradesh), Jharsuguda (Odisha), and Tamnar-Ghargoda (Chhattisgarh), shows that, in the absence of forethought, such coal-rich regions quickly end up as "critically polluted areas", with enormous damage to public health and the wider environment, unending environmental litigation, and social conflict.

- * To avoid this region having a similar fate, we urge that a wider and long-term perspective be adopted, that a **process for region-scale environmental carrying capacity estimation** be carried out, and that future project planning and environmental clearances be based on such an understanding and through some mechanisms for **region-scale coordination**.

Signed by:



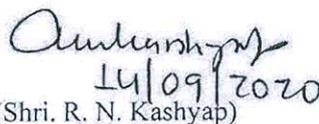
(Dr. Sharachchandra Lele)
Distinguished Fellow, ATREE



(Dr. Hemen Hazarika)
Scientist D, MOEFCC, Ranchi



(Dr. G. P. Singh)
Scientist-D, CPCB, Kolkata



(Shri. R. N. Kashyap)
Regional Officer, JSPCB, Ranchi

- * I don't agree with region scale environmental carrying capacity estimation. It would be better to ensure 100% compliance of existing EC condition along with compliance of order by Hon'ble NGT (OA-284/2019 dated 19.9.2019) which states all mines in the nearby area using road for coal transportation should maintain a free board of min 5cm in all loaded vehicle along with properly covering with impervious material to prevent escape of fines.

ANNEXURES

1. Show cause notice issued by MOEFCC (vide letter no. J-11013/27/2020-IA-I(M) dated 8th July 2020) under section 5 of Environment (Protection) Act for non-compliance of Environmental Clearance condition.
2. Show cause notices (two) issued by JSPCB vide memo no.B-88 dated 21.01.2019 and D-77 dated 01.02.2019.

By Speed Post/Online

F.No. J-11013/27/2020-IA-I (M)
Government of India
Ministry of Environment, Forest and Climate Change
(I.A. Division)

Indira Paryavaran Bhavan
Jor Bagh Road, Aliganj
New Delhi-110 003
E-mail: shuruti.rai@nic.in

Dated: 8th July, 2020

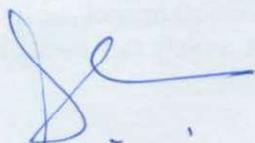
Sub: Show Cause Notice under Section 5 of Environment (Protection) Act for Non-compliance of Environment Clearance Conditions. - reg.

Ref: Ministry's EC letter No. J-11015/227/2007-IA-II(M)pt dated 21.02.2017

WHEREAS, Environmental Clearance (EC) was granted to M/s Central Coalfields Ltd., for project titled 'Expansion of Rohini Open Cast Coal Mine Project from 2.30 MTPA to 3.30 MTPA' vide letter No J-11015/227/2007-IA-II(M)pt dated 21.02.2017, subject to implementation of the various conditions and environmental safeguards contained therein, and

2. WHEREAS, the project was monitored for ascertaining compliance to the conditions stipulated in the aforesaid environmental clearance by Ministry's Regional Office at Ranchi on 19.07.2019. The monitoring report has been submitted by Regional Office to the Ministry vide its letter dated 18.09.2019. The report has been examined by the Ministry and it is observed that there are substantive non-compliances of environmental conditions contained in said EC letters dated 21.02.2017 as follows:

- i. **Specific Condition no. i:** The year-wise production details from the year of operation to till date project proponent should be submitted to RO Ranchi.
- ii. **Specific Condition no. iv:** It was observed that maximum part of the haul roads is neither black topped nor properly paved/concreted creating profuse dust in the air with vehicle movements. Nearby coal stockyard, CHP and road side also needs sufficient fixed water sprinklers / dust extractors system to control the effective dust pollution. The existing system is grossly inadequate and sporadic.
- iii. **Specific Condition no. vi:** Copy of one of blaster's diary for 2 weeks must be submitted to ascertain the blasting design, amount of explosives used etc.
- iv. **Specific Condition no. vii:** Plantations have not yet been developed on the road side, railway siding and coal stockyard where neighboring area were affected by dust pollution. Project proponent should have developed greenery in the other remaining areas of the project sites (i.e. project boundary, residential area, administrative block, guest house area, old OB dump, waste dump site area, boundary of coal stockyard and railway siding etc.) Year wise plantation data, planted species, survival rate and covered area must be submitted to RO Ranchi.
- v. **Specific Condition no. viii:** The year wise OB generated data since 2016 to till date has not been submitted.
- vi. **Specific Condition no. ix:** The year wise backfilled data from starting of the project to till date has not been submitted, to RO, Ranchi.
- vii. **Mining Condition No. ii:** The schedule of backfilling, coal production, OB generated, waste materials generated, and excavated area should be clearly brought out and submitted to the Ministry and RO Ranchi.
- viii. **Land reclamation condition No. ii. :** Project proponent should have submitted the list of the local species planted over the OB dump and total greenery area developed.



- ix. **Land reclamation condition No. iv:** The project proponent should have provided the details of quantity of top soil generated so far and quantity used for reclamation. Development of greenery in the remaining areas of over the OB dump yet to be started.
- x. **Land reclamation condition No. v:** At the project site plantation of 7.5m wide green belt was not observed in the safety zone around the mining lease area.
- xi. **Emissions, Effluents, and Waste Disposal Condition No. ii:** The data provided, for PM_{10} ($338 \mu\text{g}/\text{m}^3$) and $PM_{2.5}$ ($102 \mu\text{g}/\text{m}^3$) was found near the level of risk. Project proponent should take precautionary measure on this condition. The results of monitoring of heavy metal such as Hg, As, Ni, Cd, Cr etc. in SPM and RSPM etc. has not been submitted to RO, Ranchi.
- xii. **Emissions, Effluents, and Waste Disposal Condition No. iii:** The results of monitoring of heavy metal such as Hg, As, Ni, Cd, Cr etc. in SPM and RSPM etc. has not been submitted to RO, Ranchi as yet, which is mentioned in the above point.
- xiii. **Emissions, Effluents and Waste Disposal Condition No. vi:** The main haulage road in the mine and coal stockyard do not have fixed water sprinkler arrangements. The existing system is inadequate and sparse not covering the entire area.
- xiv. **Emissions, Effluents and Waste Disposal Condition No. vii:** It was observed that some part of the embankment has not been completed so far where waste coal spread into the Damodar River from the incomplete embankment site.
- xv. **Emissions, Effluents and Waste Disposal Condition No. viii:** Although all runoff water in the mine area is being collected in 2 mine sumps but separate rain water harvesting structure is not yet constructed in the project site by project proponent.
- xvi. **Emissions, Effluents, and Waste Disposal Condition No. x:** At the project site it was observed that constructed sedimentation pond, catch drains and siltation ponds were not connected with entire drainage system of the mining area, where drain water directly goes to nearby Damodar river. Around the sedimentation pond water logged area was observed where exists natural vegetation may destroy and also run off of water and flow of sediments directly spread into the Damodar river and other water bodies. It was also observed that nearby constructed sedimentation pond it has not been constructed embankment and retaining wall to prevent silt and sediments directly into the Damodar river and other water bodies. Project proponent should be taken proper precautionary measure as earliest.
- xvii. **Emissions, Effluents, and Waste Disposal Condition No. xi:** Industrial waste water treatment was not yet implemented.
- xviii. **Biodiversity condition No. i:** Project proponent does not have approved wild life conservation plan and no action are being taken in respect of biodiversity assessment and conservation in the project area.
- xix. **Implementation of Action Plan as Per Public Hearing & CSR Activities condition No. i:** The status of implementation of issue raised in the public hearing has not been submitted by project proponent as yet.
- xx. **Implementation of Action Plan as Per Public Hearing & CSR Activities condition No. ii:** Activity wise detail statement of expenditure was not mentioned. Project authority should have prepared a detailed CSR action plan identifying special activity only for this Rohini OCP. Year wise and item wise capital and recurring expenditure on CSR, should be reported to Regional Office Ranchi. Third party evaluation of CSR activity is yet to be carried out.
- xxi. **Implementation of Action Plan as Per Public Hearing & CSR Activities condition No. iv:** It was not observed in the project site where alternate areas have been provided for livestock grazing.
- xxii. **Corporate Environment Responsibility Condition No. iii:** The hierarchical system or Administrative Order of the company to deal with environmental issues and for ensuring compliance with the environmental clearance conditions has not been displayed on website of the company.
- xxiii. **Corporate Environment Responsibility Condition No. v:** Project proponent should have submitted the details of personnel along with their qualification associated with the environment management cell (separate lists for personnel exclusive and others)

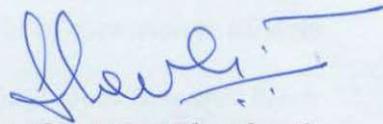
- xxiv. **Corporate Environment Responsibility Condition No. vi:** The year wise and activity wise expenditure incurred for environmental protection measures have not been recorded and furnished to RO, Ranchi.
- xxv. **Statutory Obligations Condition No. iv:** The project proponent has not obtained the approval from competent authority, for withdrawal of ground water, as on date.
- xxvi. **Statutory Obligations Condition No. v:** Project proponent should have submitted the detailed hydrogeological study report to RO, Ranchi.
- xxvii. **Monitoring of Ambient Air & Water Quality and Reporting Condition No. ii:** Online provisions of pH and turbidity meters at discharge points of STP and ETP and also at water storage ponds in the mining area have not been made. Project Proponent should have displayed the result of AAQ data digitally in front of the main Gate of the mine site.
- xxviii. **Monitoring of Ambient Air & Water Quality and Reporting Condition No. v:** Requisites of six-monthly monitoring of water quality upstream and downstream of water bodies has not been submitted to Regional Office Ranchi.

4. In the above context, your attention is drawn to provision of Section 5 of the Environment (Protection) Act, 1986 which is as reproduced below:

"For the avoidance of doubts, it is hereby declared that the power to issue directions under this section includes power to direct-

- a. *The closure, prohibition or regulation of any industry, operation or process; or*
- b. *Stoppage or regulation of the supply of electricity or water or any other service."*

5. NOW, THEREFORE, you are **directed to submit your response to why this Ministry shall not take action against you under the provision of Environment (Protection) Act, 1986 for the non-compliance of the environmental conditions mentioned above. You are advised to submit your reply within 30 (thirty) days of the receipt of this Notice failing which Ministry will be constrained to initiate action, as deemed fit and appropriate under the provision of Section 5 of the Environment (Protection) Act, 1986 and in the circumstances of the case with or without any further notice to the Project.**


(Dr. Shruti Rai Bhardwaj)
Addl. Director/Scientist 'E'

To,
Office of Project Officer,
Rohini OCP
NK Area, post Nawadih -829208
Ranchi, Jharkhand

Copy to:

1. The Addl. Principal Chief Conservator of Forests (Central), Ministry of Environment, Forest and Climate Change, Regional Office (ECZ), Bungalow No. A-2, Shyamali Colony, Ranchi - 83400- ***It is requested that the matter may kindly be followed-up with project authority. Further, follow-up action taken by the Regional Office and observations / comments of Regional Office on the response of the project, if any, may kindly be provided to the MoEF&CC to enable us to take further necessary action.***
2. The Chairman, Central Pollution Control Board, Parivesh Bhawan, East Arjun Nagar, Delhi-110032.
3. The Member Secretary, JSPCB, T.A Divison Building, HEC campus Dhurwa, Ranchi. 834004.
4. The Member Secretary (Coal), Indira Paryavaran Bhawan, Jor Bagh Road, New Delhi-03
5. Project Officer, Rohini Opencast Coal Mine Project, M/s Central Coalfield Limited, North Karanpura area, P.O. Dakra- 829210, Dist. Ranchi, Jharkhand.



JHARKHAND STATE POLLUTION CONTROL BOARD

T.A. DIVISION BUILDING (GROUND FLOOR), H.E.C., DHURWA, RANCHI -834004

Phone.: 0651-2400851/2400852/2400979/2401847, Fax-0651-2400850/138.

Web site : www.jspcb.nic.in; e-mail : ranchijspcb@gmail.com

Ref.No.

Ranchi, dated-

From,

Rajeev Lochan Bakshi
Member Secretary

To,

The Project Officer,
M/s Rohini OCP,
At - Tumadag, P.O. - Rohini, Dist. Ranchi.

Sub:- **2nd notice to show cause under section 21 of the Air (Prevention & Control of Pollution) Act, 1981 and under section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974.**

Whereas, the Board is in receipt of ambient air quality test report of your mines including Railway Siding conducted by registered Private Laboratory indicating high value of PM₁₀ and PM_{2.5}.

Whereas, the Board is in receipt of ambient air quality test report of your area conducted by M/s CMPDIL indicating high value of PM₁₀ and PM_{2.5}.

Whereas, you were earlier granted conditional consent for the period from date of issue to 31.12.2022 vide reference No. JSPCB/HO/RNC/CTO-3702346/2018/2111 dated 28.12.2018 under section 21 of the Air (Prevention and Control of Pollution) Act, 1981 and under section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974.

Whereas, you were granted opportunity to be heard in person on 28.01.2019 issued vide Letter No. B-88 dated 21.01.2019, which you did not avail.

The competent authority has, therefore, been pleased to grant 2nd opportunity to hear you in person on **07.02.2019 at 3.00 PM** in the Office Chamber of **Member Secretary** as to why your CTO under reference should not be revoked and an order for closure of your mines & railway siding be passed for the reasons as aforesaid.

Sd/-

(**Rajeev Lochan Bakshi**)
Member Secretary

Memo No- D-77

Ranchi, dated- 01.02.2019

Copy to Regional Officer, Regional Office, **Ranchi** for information and necessary action.

JLB

21

5/2/19

213
5.2.19

(**Rajeev Lochan Bakshi**)
Member Secretary

Chandan/Show Cause/RNC/18



झारखण्ड राज्य प्रदूषण नियंत्रण पर्वद
JHARKHAND STATE POLLUTION CONTROL BOARD

T.A. DIVISION BUILDING (GROUND FLOOR), H.E.C., DHURWA, RANCHI -834004

Phone.: 0651-2400851/2400852/2400979/2401847, Fax-0651-2400850/138.

Web site : www.jspcb.nic.in; e-mail : ranchijspcb@gmail.com

Ref.No.

Ranchi, dated-

From,

Rajeev Lochan Bakshi
 Member Secretary

To,

The Project Officer,
 M/s Rohini OCP,
 At - Tumadag, P.O. - Rohini, Dist. Ranchi.

Sub:- Notice to show cause under section 21 of the Air (Prevention & Control of Pollution) Act, 1981 and under section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974.

Whereas, the Board is in receipt of ambient air quality test report of your mines including Railway Siding conducted by registered Private Laboratory indicating high value of PM₁₀ and PM_{2.5}.

Whereas, the Board is in receipt of ambient air quality test report of your area conducted by M/s CMPDIL indicating high value of PM₁₀ and PM_{2.5}.

Whereas, you were earlier granted conditional consent for the period from date of issue to 31.12.2022 vide reference No. JSPCB/HO/RNC/CTO-3702346/2018/2111 dated 28.12.2018 under section 21 of the Air (Prevention and Control of Pollution) Act, 1981 and under section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974.

The competent authority has, therefore, been pleased to grant an opportunity to hear you in person on **28.01.2019 at 3.00 PM** in the Office Chamber of **Member Secretary** as to why your CTO under reference should not be revoked and an order for closure of your mines & railway siding be passed for the reasons as aforesaid.

Sd/-

(**Rajeev Lochan Bakshi**)
 Member Secretary

Memo No- **B-88**

Copy to Regional Officer, Regional Office, **Ranchi** for information and necessary action.

Ranchi, dated- **21/1/19**

(**Rajeev Lochan Bakshi**)
 Member Secretary

Show Cause/RNC/12

ORR
21/1/19

84
21-1-19