

# RAJPUTANA PROPERTIES PRIVATE LIMITED

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To

Date: 27.11.2023

Deputy Inspector General of Forests  
Ministry of Environment, Forest and Climate Change,  
Integrated Regional Office, Jaipur,  
A-218 & B 216, Aranya Bhawan, Mahatma Gandhi Road,  
Jhalana Institutional Area, Jaipur, Rajasthan – 302004

**Sub.:** - Integrated Cement Plant of 5 MTPA (2x2.5 MTPA) Capacity with captive power plant 54 MW (2x27 MW) by M/s Rajputana Properties Private Limited (RPPL)- a wholly owned subsidiary of Dalmia Cement (Bharat) Ltd. at Village Mangrol, Taluk Nimbahera, District Chittaurgarh in Rajasthan- EC Compliance-reg.

**Ref:** *Environment Clearance from MOEF, New Delhi, F. No. J-11011/472/2010- IA II (I) dated 11<sup>th</sup> September, 2015.*

Dear Sir,

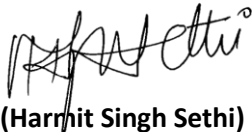
In reference to above subject matter and referred letter, we are herewith submitting point wise compliance report of conditions laid down in environment clearance for the period from **April, 2023 to September, 2023** for your kind perusal and record.

We would like to mention that because of delay in the grant of associated Mining Lease, no activity has been initiated at the site.

Thanking You

Yours Faithfully

**For Rajputana Properties Pvt. Ltd.**



**(Harjit Singh Sethi)**

**Director**

Encl: As Above

**CC: To,**

- 1) The Regional Officer, Rajasthan State Pollution Control Board, Near FCI Godown, Chanderiya, Chittorgarh, Rajasthan**
- 2) The In-charge, Central Pollution Control Board (CPCB- Central Zone), 4<sup>th</sup> Floor, Sahkar Bhawan, North T.T. Nagar, Bhopal – 462 003.**

## Environmental Clearance Compliance Half Yearly Report

### HALF YEARLY COMPLIANCE REPORT- APRIL, 2023 TO SEPTEMBER, 2023

Ref: MOEF, New Delhi Environment Clearance F. No. J-11011/472/2010- IA II (I) dated 11<sup>th</sup> September, 2015

Name of the Company: Rajputana Properties Pvt. Ltd. Subsidiary of Dalmia Cement (Bharat) Ltd.

Name of the project: Integrated Cement Plant of 5 MTPA (2x2.5 MTPA) Capacity with captive power plant 54 MW (2x27 MW) by M/s Rajputana Properties Private Limited (RPPL)- a wholly owned subsidiary of Dalmia Cement (Bharat) Ltd. at Village Mangrol, Taluk Nimbahera, District Chittaurgarh in Rajasthan.

No activity has been initiated at the site due to delay in the grant of associated Mining Lease.

Sn	Conditions	Compliance Status
<b>A.</b>	<b>Specific Conditions</b>	
i.	The project proponent shall comply with the new MOEFCC Standards issued vide GSR 612 (E) dated 25.08.2014 with respect to particulate matter, SO <sub>2</sub> , NO <sub>x</sub> for Cement sector	<b>Noted for Compliance</b>
ii.	Continuous stack monitoring facilities to monitor gaseous emissions from the process stacks shall be provided. After expansion, limit of PM shall be controlled to meet prescribed standards by installing adequate air pollution control system. Electrostatic precipitators to clinker cooler, bag house to raw mill/kiln and bag filters to coal mill and cement mill, Low NO <sub>x</sub> burners shall be provided to control NO <sub>x</sub> emissions. Regular calibration of the instruments must be ensured	<b>Noted for Compliance</b> It's a Greenfield project. Adequate Air Pollution Control Systems detailed in EIA/EMP report will be installed in Plant and will have Continuous stack monitoring facilities to monitor gaseous emissions from all the major stacks. Calibration of the instruments will be done regularly.
iii.	All the pollution control devices/equipment in raw mill/kiln, kiln feeding system, clinker cooler, coal mill, cement mill, and cement silos, shall be interlocked so that in the event of the pollution control devices/systems not working, the respective unit(s) shut down automatically.	<b>Noted for Compliance</b> As proposed during appraisal, Interlocking facility will be fitted in the pollution control equipments, so that in the event of the pollution control equipment not performing upto the standards, the respective unit(s) will shut down automatically.
iv.	Possibilities shall be explored for the proper and full utilization of gases generated from the kiln in waste heat recovery boiler (WHRB) and a feasibility report shall be prepared and submitted to the Ministry and its Regional Office within 3 months from the date of issue of the letter.	<b>Noted for Compliance</b> The same was incorporated in EIA/EMP report which was submitted during appraisal of the project for grant of EC. The actual power potential will be calculated after the total heat from flue gases and heat required for drying raw material will be available from the equipment supplier. However, a preliminary study has been done

Sn	Conditions	Compliance Status
		by HOLTEC. Techno-Economic Feasibility report of the proposed project and relevant portion of the report was submitted with previous half yearly compliance report.
v.	Efforts shall be made to achieve power consumption of 70 units/tonne for Portland Pozzolona Cement (PPC) and 95 units/tonne for Ordinary Portland Cement (OPC) production and thermal energy consumption of 670 Kcal/Kg of clinker	<b>Noted for Compliance during operation.</b>
vi	The National Ambient Air Quality Standards issued by the Ministry vide G.S.R. No. 826(E) dated 16 <sup>th</sup> November, 2009 shall be followed	<b>Noted for Compliance during operation.</b>
vii	AAQ Modelling shall be carried out based on proposed expansion based on the specific mitigative measures proposed for the expansion project and mitigative measures taken to keep the emissions well below the standards.	It's a Greenfield Cement project.
viii	Secondary fugitive emissions shall be controlled and shall be within the prescribed limits and regularly monitored. Guidelines/Code of Practice issued by the CPCB in this regard shall be followed.	<b>Noted for Compliance.</b> During and after the commissioning of the plant, Secondary fugitive emissions will be controlled within the prescribed limits and will be regularly monitored. Fugitive emission guidelines issued by CPCB shall be followed.
ix	Arsenic and Mercury shall be monitored in emissions, ambient air and water.	<b>Noted for Compliance.</b> Emission parameters as specified in GSR 612 (E) dated 25.08.2014 for Cement sector, shall be monitored. For Ambient Air Quality, parameters prescribed by CPCB in notification no 29016/20/90/PCI-I dated 18 <sup>th</sup> Nov. 2009 shall be monitored. Arsenic and Mercury in water shall be monitored.
x.	The coal yard shall be lined and covered	<b>Noted for Compliance.</b>
xi.	Efforts shall be made to reduce impact of the transport of the raw materials and end products on the surrounding environment including agricultural land by use of conveyors/rail mode of transport wherever feasible. The company shall have separate truck parking area. Vehicular emissions shall be regularly monitored.	<b>Noted for Compliance.</b> During the operation of the Plant, all measures, detailed in EIA/EMP report, shall be implemented to reduce impact of the transport. Separate truck parking area has already been provisioned in the plant layout submitted to MoEF&CC.

Sn	Conditions	Compliance Status
xii.	Efforts shall be made to further reduce water consumption by using air cooled condensers. All the treated wastewater shall be recycled and reused in the process and/or for dust suppression and green belt development and other plant related activities etc. No process wastewater shall be discharged outside the factory premises and 'zero' discharge shall be adopted	<p><b>Noted for compliance.</b></p> <p>Air cooled condensers will be used in CPP in place of Water cooled condenser. Waste water will be treated and will be reutilised for greenbelt, dust suppression, cleaning etc.</p> <p>'Zero' discharge shall be strictly adopted and no effluent shall be discharged outside the premises.</p>
xiii	Efforts shall be made to make use of rain water harvested. If needed, capacity of the reservoir shall be enhanced to meet the maximum water requirement. Only balance water requirement shall be met from other sources	<p><b>Noted for compliance.</b></p> <p>A Comprehensive Hydrogeological Study including Rainwater Harvesting &amp; Water Resources Evaluation in &amp; around proposed integrated project have been carried out to explore the various possibilities to harvest rain water and recharge the ground water. Drains will be constructed to collect rain water from roof top and ground floor. A separate reservoir of adequate capacity will be installed for storage of rain water.</p>
xiv	Regular monitoring of influent and effluent surface, sub-surface and ground water shall be ensured and treated wastewater shall meet the norms prescribed by the State Pollution Control Board or described under the Environment (Protection) Act, 1986 whichever are more stringent. Leachate study for the effluent generated and analysis shall also be regularly carried out and report submitted to the Ministry's Regional Office, SPCB and CPCB	<p><b>Noted for compliance during operation.</b></p>
xv	All the bag filter dust, raw mill dust, coal dust, clinker dust and cement dust from pollution control devices shall be recycled and reused in the process and used for cement manufacturing. Spent oil and batteries shall be sold to authorized recyclers / reprocessors only	<p><b>Noted for Compliance.</b></p> <p>Dust collected from various pollution control devices, manufacturing process will be reused and recycled back in manufacturing process of cement. Spent oil and batteries will be sold to authorized recyclers/re-processors only.</p>
xvi	The proponent shall implement a Plan for 100% utilisation the fly ash from Power Plants in the Cement Plant. All the fly ash shall be utilized as per Fly Ash Notification, 1999 subsequently amended in 2003 and 2008. Efforts shall be made to use fly ash maximum in making Pozzolona Portland Cement (PPC)	<p><b>Noted for Compliance during operation.</b></p>
xvii	The proposed cement plant kiln shall be provided	<p><b>Noted for Compliance, the plant shall be</b></p>

Sn	Conditions	Compliance Status
	with a flexible fuel feeding system to enable use of hazardous wastes such as oil sludge, cut tyres, etc. and other wastes including biomass, etc.	<b>ordered accordingly.</b>
xviii	The proponent shall examine and prepare a plan for utilisation of high calorific wastes such as chemical wastes, distillation residues, refuse derived fuels, etc as alternate fuels based on availability and composition. For this, the proponent shall identify suitable industries with such wastes and enter into an MOU for long-term utilisation of such wastes as per the E(P) A Rules, 1986 and with necessary approvals	<b>Noted for Compliance.</b> On the commencement of the operation of the plant, the unit will make effort to use hazardous wastes in their kiln subject to availability and feasibility and necessary provisions shall be made accordingly.
xix	Efforts shall be made to use of high calorific hazardous waste in the cement kiln and necessary provision shall be made accordingly. The PP shall enter into an MOU with units with potential for generating HW. And in accordance with HW Regulations and prior approval of the MPPCB	<b>Noted for Compliance.</b> On the commencement of the operation of the plant, the unit will make effort to use hazardous wastes in their kiln subject to availability and feasibility and necessary provisions shall be made accordingly. Prior approval of RSPCB as per GSR 395 (E) dated 4 <sup>th</sup> April 2016 and amendments thereon shall be taken.
xx	As proposed, green belt over 33% of the total project area shall be developed within plant premises with at least 10 meter wide green belt on all sides along the periphery of the project area, in downward direction, and along road sides etc. Selection of plant species shall be as per the CPCB guidelines in consultation with the DFO	<b>Noted for Compliance.</b> Greenbelt over 33% of the total project area will be developed as detailed in EIA/EMP report. Selection of plant species will be as per the CPCB guidelines in consultation with the DFO.
xxi	All the recommendations made in the Chapter on Corporate Responsibility for Environment Protection (CREP) for the Cement plants shall be implemented	<b>Noted for Compliance during operation.</b>
xxii	All the commitments made to the public during the Public Hearing / Public Consultation meeting shall be satisfactorily implemented and a separate budget for implementing the same shall be allocated and information submitted to the Ministry's Regional Office	<b>Noted for compliance.</b> The company will comply with the commitments made during public hearing meeting. Issues raised during Public Hearing and action plan with budgetary provisions had been submitted to MOEF&CC during appraisal of the project for grant of EC.
xxiii	At least 5 % of the total cost of the project shall be earmarked towards the Enterprise Social Commitment (ESC) based on local needs and action plan with financial and physical breakup/details shall be prepared and submitted	<b>Noted for compliance.</b> An action plan of ESC/CSR with financial and physical breakup/details has been submitted to MoEF&CC in EIA/EMP during appraisal and same shall be implemented during operation.

Sn	Conditions	Compliance Status
	to the Ministry's Regional Office. Implementation of such program shall be ensured accordingly in a time bound manner	
xxiv	The proponent shall prepare a detailed CSR Plan for every next 5 years for the existing-cum-expansion project, which includes village-wise, sector-wise (Health, Education, Sanitation, Health, Skill Development and infrastructure requirements such as strengthening of village roads, avenue plantation, etc) activities in consultation with the local communities and administration. The CSR Plan will include the amount of 2% retain annual profits as provided for in Clause 135 of the Companies Act, 2013 which provides for 2% of the average net profits of previous 3 years towards CSR activities for life of the project. A separate budget head shall be created and the annual capital and revenue expenditure on various activities of the Plan shall be submitted as part of the Compliance Report to RO. The details of the CSR Plan shall also be uploaded on the company website and shall also be provided in the Annual Report of the company	<p><b>Noted for compliance.</b></p> <p>The proposed project is a greenfield project. The same shall be implemented after commencement of the integrated project in consultation with the local communities and administration.</p>
xxv	A Risk Assessment Study and Disaster Preparedness and Management Plan along with the mitigation measures shall be prepared with a focus of Disaster Prevention and a copy submitted to the Ministry's Regional Office, SPCB and CPCB within 3 months of issue of environment clearance letter	<p><b>Complied.</b></p> <p>A Risk Assessment Study and Disaster Preparedness &amp; Management Plan along with the mitigation measures has been submitted to MoEF&amp;CC in EIA/EMP report during appraisal for EC and shall be followed during operation. The same has been submitted to RO, MoEF&amp;CC with earlier half yearly compliance report.</p>
xxvi	To educate the workers, all the work places where dust may cause a hazard shall be clearly indicated as a dust exposure area through the use of display signs which identifies the hazard and the associated health effects	<p><b>Noted for Compliance during operation.</b></p>
xxvii	Provision shall be made for the housing of construction labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, Safe drinking water, medical health care, creche etc. The housing may be in the form of temporary structures to be removed after the completion of the project	<p><b>Noted for Compliance.</b></p> <p>As far as possible local people will be hired. Further, Provision shall be made for the temporary housing provision shall be made for the construction labour within the site with all necessary infrastructure and facilities.</p>
<b>B</b>	<b>GENERAL CONDITIONS</b>	

Sn	Conditions	Compliance Status
i.	The project authorities must strictly adhere to the stipulations made by the Rajasthan Pollution Control Board and the State Government.	<b>Noted</b>
ii.	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change (MoEF&CC)	<b>Noted</b>
iii.	At least four ambient air quality monitoring stations should be established in the downward direction as well as where maximum ground level concentration of PM <sub>10</sub> , PM <sub>2.5</sub> , SO <sub>2</sub> and NO are anticipated in consultation with the SPCB. Data on ambient air quality and stank emission shall be regularly submitted to this Ministry including its Regional Office and the SPCB/CPCB once in six months	<b>Noted for Compliance</b> On the commencement of production, ambient air quality monitoring stations shall be established in consultation with the State Pollution Control Board and monitoring data of ambient air quality and stack emissions shall be submitted regularly as desired.
iv.	Industrial wastewater shall be properly collected, treated so as to conform to the standards prescribed under GSR 422 (E) dated 19 <sup>th</sup> May, 1993 and 31 <sup>st</sup> December, 1993 or as amended form time to time. The treated wastewater shall be utilized for plantation purpose	<b>Noted for Compliance</b> 'Zero' discharge shall be strictly adopted and no effluent shall be discharged outside the plant premises.
v.	The overall noise levels in and around the plant area shall be kept well within the standards (85 dBA) by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels should conform to the standards prescribed under EPA Rules, 1989 viz. 75 dBA (daytime) and 70 dBA (night-time)	<b>Noted for Compliance</b> During the operation of the plant, the overall noise levels in and around the plant area shall be kept well within the standards (85 dBA) by providing all noise control measures, detailed in EIA/EMP report, on all sources of noise generation.
vi	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act	<b>Noted for Compliance</b> Occupational Health Surveillance Programme shall be done on a regular basis and records will be maintained as per the Factories Act.
vii	The company shall develop rain water harvesting structures to harvest the rain water for utilization in the lean season besides recharging the ground water table	<b>Noted for Compliance</b> The Company has done a Comprehensive Hydrogeological Study including Rainwater Harvesting & Water Resources Evaluation in & around proposed integrated project to explore the various possibilities to harvest rain water and recharge the ground water. Recommendations of the study shall be implemented.

Sn	Conditions	Compliance Status												
viii	<p>The project proponent shall also comply with all the environmental protection measures and safeguards recommended in the EIA/EMP report, Further, the company must undertake socio-economic development activities in the surrounding villages like community development programmes, educational programmes, drinking water supply and health care etc.</p>	<p><b>Noted for Compliance.</b></p> <p>All the environmental protection measures and safeguards recommended in EIA/EMP will be followed and complied.</p> <p>Company is committed for Socio-economic development of the surrounding area and will undertake various programme for local people under its CSR/ESC programs. Based on the Need based assessment study, participatory rural appraisal involving door to door survey, we have assigned the following sectorial weightage: -</p> <table border="1" data-bbox="879 745 1409 994"> <thead> <tr> <th>Sector</th> <th>Weightage (%)</th> </tr> </thead> <tbody> <tr> <td>Water</td> <td>30</td> </tr> <tr> <td>Livelihoods</td> <td>30</td> </tr> <tr> <td>Renewable energy</td> <td>20</td> </tr> <tr> <td>Infrastructure</td> <td>15</td> </tr> <tr> <td>Miscellaneous</td> <td>5</td> </tr> </tbody> </table>	Sector	Weightage (%)	Water	30	Livelihoods	30	Renewable energy	20	Infrastructure	15	Miscellaneous	5
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Water	30													
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ix.	<p>Requisite funds shall be earmarked towards capital cost and recurring cost/annum for environment pollution control measures to implement the conditions stipulated by the MoEF&amp;CC as well as the State Government. An implementation schedule for implementing all the conditions stipulated herein shall be submitted to the Regional Office of the Ministry. The funds so provided shall not be diverted for any other purpose</p>	<p><b>Noted for Compliance.</b></p> <p>The Requisite funds earmarked towards Capital cost and Recurring cost/annum are exclusively for the implementation of the Environment Management Plan and shall not be diverted for any other purpose.</p> <p>Implementation schedule for all the conditions stipulated herein shall be submitted to the Regional Office of the Ministry at Lucknow before start of construction activity at site.</p>												
x.	<p>A copy of clearance letter shall be sent by the proponent to concerned Panchayat, Zila Parishad/Municipal Corporation, Urban Local Body and the local NO, if any, from whom suggestions/representations, if any, were received while processing the proposal. The clearance letter shall also be put on the web site of the company by the proponent</p>	<p><b>Complied</b></p> <p>It is available on the company's website: <a href="http://www.dalmiabharat.com/index62ee.html?act=cms-page&amp;cat_id=16&amp;id=83">www.dalmiabharat.com/index62ee.html?act=cms-page&amp;cat_id=16&amp;id=83</a></p>												
xi.	<p>The project proponent shall upload the status of compliance of the stipulated environment clearance conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of the MOEF&amp;CC. The respective Zonal Office of CPCB and the SPCB, The criteria pollutant levels namely; PM10, SO<sub>2</sub>, NOx</p>	<p><b>Noted for compliance</b></p> <p>The Half Yearly Compliance report are being uploaded on company's website. It is available on the website: <a href="https://www.dalmiabharat.com/index62ee.html?act=cms-page&amp;cat_id=16&amp;id=83">https://www.dalmiabharat.com/index62ee.html?act=cms-page&amp;cat_id=16&amp;id=83</a></p> <p>It is also simultaneously sent to the Regional</p>												



Sn	Conditions	Compliance Status
	(ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the projects shall be monitored and displayed at a convenient location near the main gate of the company in the public domain	Office of the MOEF&CC, the respective Zonal Office of CPCB and the SPCB. Data on the criteria pollutant levels indicated for the projects shall be monitored and displayed at a convenient location near the main gate of the company in the public domain once the plant commences operation.
xii	The project proponent shall also submit six monthly reports on the status of the compliance of the stipulated environmental conditions including results of monitored data (both in hard copies as well as by e-mail) to the Regional Office of MOEF&CC, the respective Zonal Office of CPCB and the SPCB. The Regional Office of this Ministry/ CPCB /SPCB shall monitor the stipulated conditions	<b>Being Complied.</b>
xiii	The environmental statement for each financial year ending 31 <sup>st</sup> 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 conditions and shall also be sent to the respective Regional Office of the MOEF&CC by e-mail	<b>Noted for compliance.</b>
xiv	The Project Proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB and may also be seen at Website of the MoEF&CC at <a href="http://envfor.nic.in">http://envfor.nic.in</a> . This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same should be forwarded to the Regional office	<b>Note for compliance.</b> It was advertised in two newspapers namely The Indian Express (English lang.) and Rajasthan Patrika (Hindi lang.) dated 2 <sup>nd</sup> Oct. 2015. Copies of the same has already been submitted.
xv	Project authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of commencing the land development work	<b>Noted for compliance.</b>
8.	The Ministry may revoke or suspend the clearance, if implementation of any of the above	<b>Agreed.</b>

<b>Sn</b>	<b>Conditions</b>	<b>Compliance Status</b>
	conditions is not satisfactory	
9.	The Ministry reserves the right to stipulate additional conditions if found necessary. The Company in a time bound manner shall implement these conditions	<b>Agreed.</b>
10	The above conditions shall be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2008 and the Public (Insurance) Liability Act, 1991 along with their amendments and rules	<b>Agreed.</b>