



SHAKAMBHARI
GROUP

BRAVO SPONGE IRON PRIVATE LIMITED

CIN: U27106WB1997PTC082921 | GSTIN: 19AACCB5058J1ZH | PAN: AACCB5058J | State: West Bengal | State Code: 19

Ref: - BSIPL/SMC/MoEF&CC/Oct-2019-Mar-2020

Date: 01/06/2020

To,
The Dy. Director General of Forests (Central)
Eastern Regional Office,
Ministry of Environment Forests & Climate Change,
A/3, Chandrashekharpur, Bhubaneswar – 751023 (Odisha)

SUB: Six Monthly (October, 2019 to March, 2020) Compliance to Environmental Clearance conditions vide MoEF&CC F. No. J-11011/758/2009-IA.II (I) dated 18th April, 2017 by M/s Bravo Sponge Iron Pvt. Limited, Vill-Mahuda, PO-Rukni. Dist- Purulia (WB)

Dear Sir,

With reference to above, we are submitting herewith the six monthly compliance report (Period October, 2019 to March 2020) of M/s Bravo Sponge Iron Pvt. Limited, Vill-Mahuda, PO-Rukni, Dist- Purulia (WB) as per the directives of Ministry of Environment Forest and Climate Change (MoEF&CC), Government of India. Point wise compliance status report along with latest environmental monitoring data is enclosed for your kind perusal. Hope you will find the same in order.

Kindly acknowledge our submission.

Thanking You.

Yours faithfully,

For **Bravo Sponge Iron Pvt. Limited**

Authorized Signatory

Encl: as above



Copy to:

The Sr. Environmental Engineer, West Bengal Pollution Control Board, Asansol Regional Office, ADDA Commercial Market (2nd Floor), Oppo. Asansol Fire Station, GT Road, Asansol-713301 Dist-Paschim Burdwan (WB).

SIX MONTHLY COMPLIANCE REPORT

October, 2019 - March, 2020



Prepared by:

Bravo Sponge Iron Pvt. Limited

Village- Mahuda, P.O-Rukni, Dist – Purulia, West Bengal

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1.05.2020



SIX MONTHLY COMPLIANCE RPORT

Name of the Project	:	M/S BRAVO SPONGE IRON PVT. LIMITED Vill-Mabuda, PO-Rukni, PS-Para, Dist- Purulia (WB)
Environmental Clearance Letter Ref.	:	F.No.: J-11011/758/2009-IA.II(I), Dated: 18th April, 2017
Period of Compliance Report	:	October 2019 to March 2020

A- SPECIFIC CONDITIONS:

Sl. No.	CONDITIONS	COMPLIANCE STATUS
1.	The project proponent shall install 24x7 air monitoring devices to monitor air emissions, as provided by the CPCB and submit report to Ministry and its Regional Office.	We have installed 24x7 OCEMS connected to CPCB portal to monitor the air emissions. Latest stack monitoring reports ^{one} attached as Annexure 1.
2.	In-plant control measures like bag filters, de-dusting and dust suppression system shall be provided to control fugitive emissions from all the vulnerable sources. Dust extraction and suppression system shall be provided at all the transfer points, coal handling plant etc. Water sprinkling system shall be provided to control secondary fugitive dust emissions generated during screening, loading, unloading handling and storage of raw materials etc.	We have already installed de-dusting systems like bag filters and ESPs for an effective control of dust emissions. Dust extraction system has been provided at the strategic points attached with bag filter units for cooler discharge, intermediate bin and product house and separation house. Fixed type water sprinklers for dust suppression at raw material handling system along the conveyor, finished product house area, cooler discharge, along with Kiln axis and all other strategic locations. BSIPL have deployed movable water tankers for dust suppression on the road and minimizing fugitive emissions. Latest fugitive emissions monitoring report is attached as Annexure-2
3	The COD level in the effluent should be maintained at the prescribed standard and the STP effluent is to be recycled within the premises.	Recycle and Reuse practice has been adapted by us and no effluent being discharged outside factory premises. For domestic effluent septic tank followed by soak pit facility has been provided. Effluent analysis report is enclosed as Annexure-3



4	No effluent shall be discharged outside the plant premises and 'zero' discharge shall be adopted.	We are adapting recycle and reuse practice and no effluent being discharged outside the factory premises.
5	Continuous stack monitoring facilities for all the stacks shall be provided and sufficient air pollution control device viz. Electrostatic Precipitator (ESP), bag house, bag filters etc. shall be provided to keep the emission levels below 50 mg/Nm ³ and installing energy efficient technology.	<p>Online Continuous Emission Monitoring System (OCEMS) have been installed at Stacks of DRI and CPP.</p> <p>Air pollution control devices viz. ESPs and bag filters along with dust extraction and suppression system have been installed and efficiently operated to control emission level well within the norms.</p> <p>Third party monitoring by NABL accredited laboratory being conducted periodically to evaluate the emission levels.</p> <p>Latest stack monitoring report in enclosed as Annexure-1</p>
6	Efforts shall further be made to use maximum water from the rain water harvesting sources. Use of air cooled condensers shall be explored and closed circuit cooling system shall be provided to reduce water consumption and water requirement shall be modified accordingly. All the effluent should be treated and used for ash handling, dust suppression and green belt development. ETP sludge should be disposed off scientifically.	All possible attempts are made to ensure optimal use of water within the factory premises. There is rain water harvesting pond to harvest the rain water and reduce the water consumption. Effluent generated being used for ash handling, dust suppression and used for green belt development after treatment in ETP. Sludge generated being used as manure for green belt development.
7	All internal roads shall be black topped. The roads shall be regularly cleaned with mechanical sweepers. A 3-tier avenue plantation using native species shall be developed along the roads. Facilities for parking of trucks carrying raw coal from the linked coalmines shall be created within the Unit.	<p>The concreting of all internal roads (Total 1650 Meters) with work area platform where movement of heavy vehicles exercised has been completed. Some pics of RCC road are attached as Annexure-4</p> <p>Plantation have been completed using indigenous species i. e. Mehagani, Segun, Pakur, Radhachura, Neem, Bakul, Shishu, Jarul, Arjuna, Sonajuri, Kadam, Pepal etc. along the plant periphery as well as inside the plant and Approx. 13500 plants have been planted. Some pics are attached as Annexure-5</p>

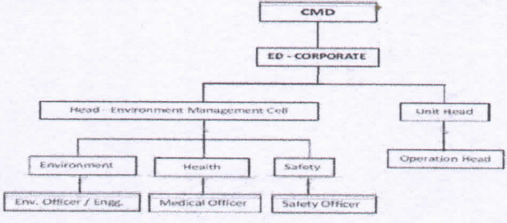
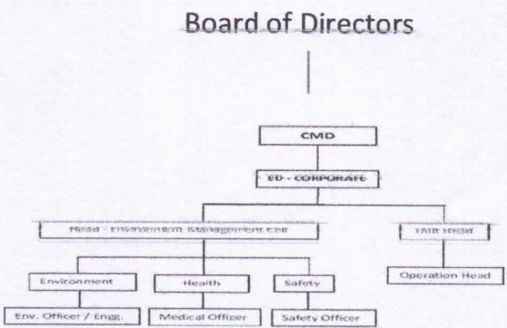


8	The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826 (E) dated 16th November 2009 shall be followed.	It is being followed. Latest Ambient Air Quality Monitoring report is attached as Annexure-6
9	Gaseous emission levels including secondary fugitive emissions from all the sources shall be controlled within the latest permissible limits issued by the Ministry vide G.S.R.414 (E) dated 30th May, 2008 and regularly monitored. Guidelines /Code of Practice issued by the CPCB shall be followed.	Suitable control measures have been undertaken to keep Gaseous emission levels including secondary fugitive emissions within the latest permissible limits. Latest work zone (Fugitive Emission) monitoring report is enclosed as Annexure-2
10	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.	Regular monitoring being done for effluent, surface and ground water. Latest monitoring report is enclosed as Annexure-7
11	Proper handling, storage, utilization and disposal of the solid waste shall be ensured and regular report regarding toxic metal content in the waste material and its composition, end use of solid / hazardous waste shall be submitted to the Ministry's Regional Office, SPCB or CPCB.	Proper handling, storage, utilization and disposal of solid waste being done. Analysis of toxic metal content in the solid waste being periodically carried out by approved agency. The monitoring report is enclosed as Annexure-8
12	A time bound action plan shall be submitted to reduce solid waste generated due to the project related activity, its proper utilization and disposal.	Dolochar generated from sponge iron plant is being utilized in AFBC boiler of the captive power plant. Fly ash is being utilized in fly ash brick manufacturing. Induction Furnace slag and Bottom Ash are being used for land filling and road construction work.
13	Proper utilization of fly ash shall be ensured as per Fly Ash Notification, 1999 and subsequent amendment in 2003 and 2009. All the fly ash shall be provided to cement and brick manufacturers for further utilization and Memorandum of Understanding shall be submitted to the Ministry's Regional Office.	All the fly ash generated within the plant is provided to brick manufacturers for further utilization. Accordingly company has made the agreement with various vendors for the same. Copies of the agreements are enclosed as Annexure-9



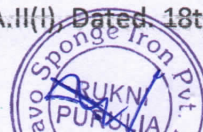
14	Risk and Disaster Management Plan shall be prepared and a copy submitted to the Ministry's Regional Office, SPCB and CPCB within 3 months of issue of environment clearance letter.	Complied.
15	10-15 m wide green belt should be developed all along the boundary of the plant and in all 33% of the area should be developed green by planting native and broad leaved species in consultation with local DFO and local communities as per the CPCB guidelines. The complete plantation should be completed in 3 years.	We have achieved the target of 33% green belt development for extensive greenery in consultation with local DFO involving indigenous and broad leaved species. Some plantation photos are enclosed as Annexure-5 Post plantation work for nourishment of the plants being done on regular basis.
16	All the commitments made to the public during Public Hearing/public consultation meeting shall be satisfactorily implemented and adequate budget provision shall be made accordingly.	It is being complied and we are in the process of regular compliance of commitments made during public hearing i.e. up gradation of educational facilities, organizing health checkup camps for nearby villagers, abatement of pollution, providing necessary PPEs to the workers for safety etc. BSIPL have dedicated HR department to take care of CSR activities.
17	An amount equal to Rs. 400.87 Lakhs, shall be earmarked towards the Enterprise Social Commitment based on Public Hearing issues, locals need and item-wise details along with time bound action plan as indicated by the project proponent shall be implemented. Action taken report in this regard shall be submitted to the Ministry's Regional Office.	The amount earmarked is exclusively used for implementation of Enterprise Social Commitment. Our expenditures incurred towards facilitating study materials to the nearby school students, infrastructure development in the schools, organizing free medical health checkup and medicine distribution camp for nearby villagers, plants distribution for encouragement of social forestry, drinking water supply and social causes etc.
18	The Company shall submit within three months their policy towards Corporate Environment Responsibility which shall inter-alia address (i) Standard operating process/procedure to being into focus any	It is compiled and already submitted. BSIPL have implemented standard operating procedure to look into any infringement/ deviation/violation of environmental or forest norms/ conditions. BSIPL have also the Hierarchical system/



	<p>infringement/deviation/ violation of environmental or forest norms/conditions, (ii) Hierarchical system or Administrative order of the Company to deal with environmental issues and ensuring compliance to the environmental clearance conditions and (iii) System of reporting of non-compliance/violation environmental norms to the Board of Directors of the company and/or stakeholders or shareholders.</p>	<p>Administrative order to deal with environmental issues and compliance of EC conditions.</p>  <p>BSIPL have in placed reporting system for non-compliance/violation of environmental norms.</p> 
19	<p>The project proponent shall provide for solar light system for all common areas, street lights, villages, parking around project area and maintain the same regularly.</p>	<p>We have already started installation of the solar lighting system in strategic areas as directed.</p>
20	<p>The project proponent shall provide for LED lights in their offices and residential areas.</p>	<p>Complied.</p>
21	<p>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, mobile STP, 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>	<p>It is being complied.</p>
<p>B-GENERAL CONDITIONS:</p>		
1	<p>The project authorities must strictly adhere to the stipulations made by the West Bengal Pollution Control Board and the State Government.</p>	<p>Being adhered as per the stipulation made by WBPCB and State Government. Consent to Operate obtained from WBPCB is attached as Annexure-10</p>



2	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment, Forests and Climate Change (MoEF & CC).	It shall be complied with.
3	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 ₁₀ , PM _{2.5} , SO ₂ and NO _x are anticipated in consultation with the SPCB. Data on ambient air quality and stack emission shall be regularly submitted to this Ministry including its Regional Office at Bhubaneswar and the SPCB/CPCB once in six months.	Ambient Air Quality Monitoring being carried on as per direction in consideration of maximum ground level concentration of SPM, SO ₂ , and NO _x . Latest Ambient Air Quality monitoring reports for PM ₁₀ , PM _{2.5} , SO ₂ , NO ₂ and stack monitoring report is enclosed in Annexure-6 & 1
4	Industrial wastewater shall be properly collected, treated so as to conform to the standards prescribed under GSR 422 (E) dated 19th May, 1993 and 31st December 1993 or as amended from time to time. The treated wastewater shall be utilized for plantation purpose.	Being complied. Industrial Effluent is being treated in ETP and utilized for green belt development. Latest analysis report of treated effluent is enclosed as Annexure-3
5	The overall noise levels in and around the plant area shall be kept well within the standards (85 dB(A)) 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 dB(A) during day time and 70 dB(A) during night time.	Noise control measures has already been implemented to keep the noise level well within the 85 dB(A) and ambient noise level below 75 dB(A) (during day time) and 70 dB(A) (during night time). Work Zone and Ambient Noise Monitoring report is enclosed as Annexure-11A & 11B
6	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	Occupational health surveillance program has been taken as a regular exercise for the employees and records are maintained. Health cards of some employees are enclosed as Annexure-12



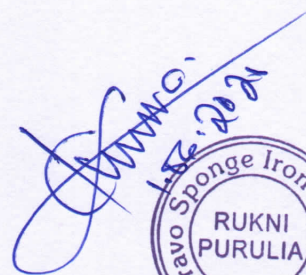
7	The company shall develop rain water harvesting structures to harvest the rain water for utilization in the lean season besides recharging the ground water table.	Rain water harvesting structure has been developed within the plant to harvest the rain water.
8	The project proponent shall also comply 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.	Environmental protection measures have been implemented for effective compliance recommended in EIA/EMP reports. We have initiated to comply with socio-economic development activities in surrounding villages. As a part of Enterprise Social Commitment we are providing jobs to the local people and facilitating study materials to the school students (school bags and books, pencil box, water bottle etc.) of nearby villages, lifesaving jackets to boats man of Mithon Dam, Health checkup camp with free medicine distribution and contributing towards social causes etc.
9	Requisite funds shall be earmarked towards capital cost and recurring cost/annum for environment pollution control measures to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change (MoEF & 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 at Bhubaneshwar. The funds so provided shall not be diverted for any other purpose	Requisite funds have been earmarked towards capital cost and recurring cost/annum for environmental pollution control measures to implement the conditions stipulated by MoEF & CC. Accordingly necessary facilities like ESPs, attached with AFBC and WHRB followed by silos, bag filters along with dust extraction system, Water sprinkling system for fugitive dust suppression, water tankers for dust suppression on roads, green belt development and water recycling system etc. have been installed for abatement of the environmental pollution. Suitable manpower have been engaged for an efficient operation, monitoring and maintenance of the devices installed.



10	A copy of clearance letter shall be sent by the proponent to concerned Panchayat, Zila Parishad/Municipal Corporation, Urban Local Body and the local NGO, 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.	Complied.
11	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 & CC at Bhubaneshwar. The respective Zonal Office of CPCB and the SPCB. The criteria pollutant levels namely; PM10, SO2, NOx (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.	It is being complied.
12	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 at Bhubaneswar/ CPCB/SPCB shall monitor the stipulated conditions.	Six monthly reports on the status of the compliance of the stipulated environmental conditions including results of monitored data being submitted to MoEF & CC and Pollution Control Board in both soft & hard copies. This time it is submitted in soft copy only as per direction of Hon'ble MoEFCC F.NO. 106-12/EPE dtd. 11.05.2020
13	The environmental statement for each financial year ending 31st 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	It is being complied. The environment statement of the ending financial year 31st March, 2020 will be submitted SPCB in Form-V and compliance status will be sent to Regional Office of the MoEFCC as per direction



	(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 at Bhubaneswar by e-mail.	
14	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 Ministry of Environment, Forests and Climate Change (MoEF & CC) at http://envfor.nic.in . 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 at Bhubaneswar.	Complied.
15	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.	Financial closure as well as date of start of land development work has already been informed.


18.04.2021
