	<b>ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN</b>					<b>PROC. No.:</b> O-EP 019
	DOCUMENTATION	COMMUNICATION	TRAINING	MONITORING	CONTINUOUS IMPROVEMENT	
<b>COPY No.</b> 001	<b>PAGE</b> 1 of 1	<b>PREVENTIVE AND CORRECTIVE ACTIONS</b>				<b>REV. No.</b> 001

**1 Purpose**

This procedure defines the responsibilities and process for identifying and investigating non-compliances; taking action to mitigate any negative impacts caused; and for applying corrective and preventive actions.

- ✓ Identifying the root cause(s) of non-conformances or non-compliances;
- ✓ Identifying appropriate preventive and corrective actions (including modifying or creating environmental procedures and work practices);
- ✓ Planning and implementing preventive and corrective actions;
- ✓ Stipulating dates for action completion;
- ✓ Verifying the close-out and effectiveness of preventive and corrective actions.

**2 Scope**

Preventive actions will be taken whenever a potential non-compliance issue is identified.

Corrective actions will be taken whenever a non-compliance issue is identified.

The Environmental Coordinator or the HSE Supervisor or designee will verify proper implementation of preventive and corrective actions.

**3 Responsible Parties**

The Environmental Coordinator and the HSE Supervisor will guarantee that all preventive and corrective actions are being properly carried out. The Plant Manager will conduct a root cause analysis.

**7 General Rules**

A preventive and corrective action request (PAR/CAR) will be used for recording non-conformances (Note: a non-compliance is a non-conformance), as well as preventive and corrective actions.

**4 Forms Used**

Preventive Action Request (PAR), O-EF 019.A  
 Corrective Action Request (CAR), O-EF 019.B

Action Plans may be used where appropriate for planning, scheduling and managing preventive and corrective actions.

**Note:** All forms must be numbered before being completed and filed.

Environmental procedures and/or training programs will be modified and/or created where necessary to establish adequate controls for avoiding repetition of non-conformances and non-compliances.

**5 References**

ISO 14001:1996, Element 4.5.2


**8 Records**

Records will be retained by the Environmental Coordinator and the HSE Supervisor.

**6 Procedure**

Where non-conformances or non-compliances are identified through environmental inspections/audits, monitoring data, impact evaluation or performance evaluation, the responsible parties are responsible for:


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**9 Record of Revisions**


Revision Date	Description	Sections Affected

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	<b>ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN</b>				FORM. No.: O-EF 019.A
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Person Responsible:	
Date:	Location:
Potential Impact/Risk:	Root Cause Analysis:
Preventive Action To Be Taken:	
Responsible for the Implementation:	
Date of Implementation:	
<b>Verification of Implementation</b>	
Person Responsible:	
Date:	Status:
Remarks:	

<b>DEVELOPED BY</b>	<b>REVIEWED BY</b>	<b>APPROVED BY</b>

	<b>ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN</b>				FORM. No.: O-EF 019.B
	DOCUMENTATION	COMMUNICATION	TRAINING	MONITORING	CONTINUOUS IMPROVEMENT
COPY No. 001	PAGE 1 of 1	<b>CORRECTIVE ACTION REQUEST</b>			REV. No. 001

Person Responsible:	
Date:	Location:
Non-compliance:	Root Cause Analysis:
Corrective Action:	
Responsible for Implementation:	
Date of Implementation:	
<b>Verification of Implementation</b>	
Person Responsible:	
Date:	
Status:	
Remarks:	

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<b>COPY No.</b> 001	<b>PAGE</b> 1 of 4	<b>EXTERNAL INSPECTION MANAGEMENT</b>				<b>REV. No.</b> 001

### 1. Purpose

Defines how to proceed during External Inspections/Audits, regardless of advance notice of an External Inspection.

### 2. Scope

In order to ensure compliance with existing environmental and health & safety regulations, the law authorizes government agencies to conduct routine or surprise inspections. Lenders' engineers and their designees may also have the right to inspect the plant. Representatives of such entities with proper credentials have the authority to enter any facility and inspect it for regulatory compliance. These inspectors have the right to see and copy facility records, inspect monitoring equipment and sample emission points that the facility is required to sample. These inspectors will be called the External Inspection Team.

The following items should be considered when preparing for both routine and surprise inspections:

- Preparation and pre-admission requirements
- Opening meeting
- Touring the site
- Reviewing files
- Responding to questions
- Use of PPE
- Closing the meeting


### 3. Responsible Parties

- Plant Manager – Reviews findings with the External Inspection Team, Environmental Coordinator (Environmental Agency) and the HSE Supervisor (workers' health and safety issues). Coordinates the identification of the

root causes of non-compliances and the establishment of preventive and corrective actions ( PAR/CAR ) with completion dates. Submits the original PAR and CAR to the Environmental Coordinator or HSE Supervisor as pertinent, with copies to the Operations Manager and the Brazilian Environmental Manager. After completion of measures established in the PAR and CAR, submits the original document to the Brazilian Environmental Manager. Approves the External Inspection Report and submits it to the Brazilian Environmental Manager and the Corporate level.

- Environmental Coordinator and HSE Supervisor – Serve as the interface with the External Inspection Team and accompany them during the inspection. Verify non-compliances with the External Inspection Team. Review findings with the External Inspection Team and the Plant Manager. Track the status of all outstanding PAR and CAR by filling out the External Environmental Inspection Summary Report, O-EF 020.A. Perform verification inspections. When non-compliances are found during verification inspections, open a new CAR/PAR and submit it to the Plant Manager. Prepare an External Inspection Report by filling out form O-EF 020.B and submit it to the Plant Manager.
- Operations Manager and Plant Engineer – Activate crews to take the preventive and corrective measures determined during the inspection by their respective completion dates.
- External Inspection Team – Performs the inspection at the Macaé Merchant Power Plant. Presents non-compliances found and reviews the findings with the Environmental Coordinator, the HSE Supervisor and the

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Plant Manager. Signs the O-EF 020.C form , with the list of required documents, and agrees to protect the confidentiality of these documents.

**4. References**

- Management of Inquiries from Stakeholders, O-EP 007
- Preventive and Corrective Actions, O-EP 019

**5. Forms Used**

- External Environmental Inspection Summary Report, O-EF 020.A
- External Inspection Report, O-EF 020.B
- Documents Required by External Inspection Team, O-EF 020.C

**6. Procedure**

Preparing and Pre-Admission Requirements

Advance notice of an inspection by a Government Agency is not usually required. However, when advance notice is given, the HSE Supervisor should consult with the appropriate management personnel to anticipate potential questions. In addition, the Environmental Coordinator or the HSE Supervisor should request the External Inspection Team to specify in writing the purpose, day and time of inspection.

The Environmental Coordinator or the HSE Supervisor should document the inspection request by filling out the External Communication Form, O-EF 007.A.

Opening the Meeting

Before any inspection at the plant, it is necessary to hold an opening meeting, where the External Inspection Team will be introduced to the Plant Manager, the HSE Supervisor and the Operation Manager. During the opening meeting, the External Inspection Team should present the following:

- Credentials and qualifications of the Inspectors;
- Identification, specifying the Inspector’s legal authority to enter the facility;
- Exact scope and nature of the inspection.


Based on the information obtained and the purpose of the inspection, the Plant Manager will brief the External Inspection Team on the activities of the Plant.

Touring the Site

The External Inspection Team should be taken only to areas specifically requested for the visit. The External Inspection Team is not allowed to wander around and look at things beyond the scope of the inspection. The HSE Supervisor or designee should accompany the External Inspection Team during the entire inspection.

All photos asked for during the inspection must be taken with the digital camera owned by the Plant. A floppy disk with the photos will be given to the External Inspection Team after Plant Manager approval, with a copy to be attached to the External Inspection Report. The External Inspection Team should be informed of the confidential nature of the photographs.

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Reviewing Files

Environmental Agencies have the authority to obtain specific types of written information from the facility during the inspection.

Some documents, such as financial statements, production output data, marketing data, and research data are typically considered confidential, proprietary, or trade secrets and should be treated as such when Government Agencies undertake an inspection.

All documents requested by the External Inspection Team must be listed in Form O-EF 020.C, completed by the HSE Supervisor, specifying if the documents were analyzed and/or copied, and if any document is pending. All requested documents copied for the External Inspection Team must be identified with a label saying: "Controlled Copy, Confidential Document". This Form must be signed by both the HSE Supervisor and all members of the External Inspection Team.

Responding to Questions

The Environmental Coordinator or the HSE Supervisor are responsible for answering questions put by the External Inspection Team. However, the said should not speculate or give answers which are broader than the questions asked or that extend beyond the scope of the External Inspection Team investigation.

If an answer to a question is not known, the Environmental Coordinator or the HSE Supervisor should offer to provide a response at a later time. This will be clearly documented in the "Questions and Answers" section of the External Inspection Report, O-EF 020.B.

Use of PPE

The HSE Supervisor should ensure that all members of the External Inspection Team comply with all applicable plant safety rules and that they wear all necessary protective equipment (e.g., hard hats, goggles, steel-toed shoes, gloves, overalls, etc.).

Closing the Meeting


On completion of the inspection, the External Inspection Team will review its findings with the Plant Manager, the Environmental Coordinator and the HSE Supervisor. Form O-EF-020.D will then be completed and signed by the External Inspection Team and the plant personnel.

Based on Form O-EF 020.D, the Environmental Coordinator or the HSE Supervisor, as pertinent, will then open a CAR for each non-compliance found, using the Corrective Action Request Form O-EF 019.B, and a PAR for each preventive action suggested, using the Preventive Action Request Form O-EF 019.A.

The Environmental Coordinator or HSE Supervisor or designees will also track the status of all outstanding PAR and CAR, using the External Environmental Inspection Summary Report, Form O-EF 020.A.

After the External Inspection is completed, the Environmental Coordinator and the HSE Supervisor should prepare a written report, by filling out the External Inspections Report, O-EF 020.B, to be submitted to the Plant Manager, Brazilian Environmental Manager and the Corporate level.

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Taking actions based on the findings of the External Inspection Team

The Plant Manager shall coordinate the identification of the root causes of the non-compliances, and the preventive and corrective actions to be taken, with the completion dates for these actions. This information will be documented on the original PAR and CAR.

The Environmental Coordinator and the HSE Supervisor are responsible for performing verification inspections, based on the PARs and CARs generated during the inspection. During this inspection, it will be verified if the planned actions were taken, up until the planned date of completion.

When the verification inspection result is positive, the Environmental Coordinator or the HSE Supervisor signs the document, retains a copy and sends the original to the Plant Manager, who will then approve it and submit it to the Brazilian Environmental Manager.

When the verification inspection result is negative, the Environmental Coordinator or the HSE Supervisor opens a new CAR and submits it to the Plant Manager, who will then determine the new completion date and inform the Operations Manager/Plant Engineer.

The verification inspection should be repeated until the result is positive.

When full compliance is determined or preventive and corrective actions have been accepted, the inspection team leader will sign the original PAR and CAR and return it to the Plant Manager, or designee, for closure and filing.

**7. General Rules**

Records, including for PAR and CAR, relating to potential or actual non-compliance issues, will be treated as confidential.

Potential non-compliance issues must receive prompt attention and timely preventive action.

All audit/inspection records shall be marked "Environmental Audit/Inspection Report: Privileged Document" and distributed to all individuals who need to know about their contents in order to assess, respond to or remedy a potential or actual non-conformance.

**8. Records**


The Environmental Coordinator and the HSE Supervisor, as pertinent, must keep all inspection records.

**9. Record of Revision**

Revision Date	Description	Sections Affected

<b>DEVELOPED BY</b>	<b>REVIEWED BY</b>	<b>APPROVED BY</b>



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	DOCUMENTATION	COMMUNICATION	TRAINING	MONITORING	CONTINUOUS IMPROVEMENT	<b>DOC. No.:</b>
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**Person Responsible:**

**Date:**

**Time:**

**Inspection Agency:**


Name of Inspector	e-mail address	Phone Number
1.		
2.		
3.		
4.		

Please mark the Team Leader with a ( \* )

**Main Inspection Concern:**

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**Summary of Closing Meeting:**

**Attached:**

- Statement of the Inspector's legal authority

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**ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN**

DOCUMENTATION	COMMUNICATION	TRAINING	MONITORING	CONTINUOUS IMPROVEMENT
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**FORM. No.:**  
O-EF 020.C

**DOC. No.:**

**COPY No.**  
001


**PAGE**  
1 of 2

**DOCUMENTS REQUIRED BY THE EXTERNAL INSPECTION TEAM**

**REV. No.**  
001

LIST OF DOCUMENTS REQUIRED BY THE EXTERNAL INSPECTION TEAM	Analyzed at Plant	Copied / Taken	Pending
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			
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18.			
19.			
20.			

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	<b>ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN</b>				FORM. No.: O-EF 020.C
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COPY No. 001	PAGE 2 of 2	<b>DOCUMENTS REQUIRED BY THE EXTERNAL INSPECTION TEAM</b>			REV. No. 001

LIST OF DOCUMENTS REQUIRED BY THE EXTERNAL INSPECTION TEAM	Analyzed at Plant	Copied / Taken	Pending
21.			
22.			
23.			
24.			
25.			
<b>Total</b>			

Remarks:


The External Inspection Team hereby agrees to keep confidential all information presented in the documents listed above, and will not use any of this information for any other purposes whatsoever.

Date:     /     /

Name of the Inspector	Signature
1.	
2.	
3.	
4.	

Plant personnel - Name	Signature

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	DOCUMENTATION	COMMUNICATION	TRAINING	MONITORING	CONTINUOUS IMPROVEMENT	
<b>COPY No.</b> 001	<b>PAGE</b> 1 of 3	<b>CONTRACTORS MANAGEMENT</b>				<b>REV. No.</b> 001

### 1. Purpose

To provide guidelines for contractor selection and management.

To establish a system for selecting contractors that considers not only technical abilities and costs but also the performance of contractors in the areas of environmental concern and workers' health and safety.

To ensure that environmental and health & safety requirements for contractual agreements between the Macaé Merchant Power Plant and contractors are met.

### 2. Scope

The environmental and health & safety requirements portion of a selection system should include:

- A risk assessment to evaluate the level of risk attached to a particular contracted service;
- Pre-qualification; and
- Selection of a contractor based on a sound review of environmental and health & safety performance indicators.

Minimum areas of responsibility for the Macaé Merchant Power Plant representatives overseeing and managing contracted operations or personnel include:

- Providing pre-job planning / activities;
- Providing oversight during operations; and
- Conducting final evaluations on contractor performance with regard to environmental and health & safety requirements aspects.

### 3. Responsible Parties

- Plant Manager – conducts an assessment of each contract service.
- Environmental Coordinator and HSE Supervisor – oversight of the administration

of environmental and health & safety requirements related issues by each contractor.

### 4. References

- API RP's 2220, 2221 and 75
- International Environmental Guidelines, Contractors Responsibilities, El Paso ( in APPENDIX)

### 5. Forms Used

- Contractor Safety Questionnaire, O-EP 021.A

**Note:** This form must be numbered before being completed and filed.

### 6. Definitions

Contractor and Contractor Employees: A contractor or contractor employee is any non-Macaé Merchant Power Plant organization or individual performing work on behalf of the Macaé Merchant Power Plant under the direct supervision of the contractor company and whose project has a complementation time frame. This does not include casual visitors, such as salespersons, truck drivers and delivery people.

### 7. Procedure

The Plant Manager is responsible for conducting an assessment of each contract service with the help of the Environmental Coordinator and the HSE Supervisor.

Recommended risk rankings include High, Medium and Low categories. A ranking procedure assists in better estimating the level of environmental and health & safety requirements pre-qualification review for contractor selection. For some very low ranking risks, pre-qualification reviews may not be necessary, for example in the case of temporary secretaries, accountants and other administrative support. As a minimum, a

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risk assessment should include evaluation of the following factors:

- Nature of the work;
- Location of the work;
- Potential for exposure to worksite hazards;
- Duration of the work; and,
- Potential consequences of exposure.

For services with medium and high risks, the plant manager must perform a pre-qualification to review a contractor's suitability and ability to perform the work safely and in an environmental friendly manner, with technical and commercial excellence, and on schedule.

The following pre-qualification information should be presented by the candidate contractor company for work to be performed at the Macaé Merchant Power Plant:

- Insurance policies with civil liability coverage and labor accidents;
- Resumés of the safety team, with technical experience and education;
- Environmental Risk Prevention Program, prepared by the company;
- Size of the Specialized Services in Safety Engineering and Occupational Health Program; and,
- Medical Health Control Program (PCMSO).

Ideally, the selected contractor will be the one most likely to perform the work safely, economically and correctly in technical terms, with minimal supervision and in a timely manner. Reviews conducted for pre-qualification must be taken into consideration, along with all other business and operational aspects. Form O-EF 021.A will be used in the evaluation.

The Plant Manager will rank the contractors to be evaluated from most to least desirable.


Contractors pre-qualified with truly unacceptable EHS performance are disqualified, even submitting the lowest bid. This ranking will be based on representative previous experience built up projects already completed.

At the discretion of El Paso and notwithstanding the provisions in NR-4 ( see Chapter II ), if the risks involved or the scope of the work require a full-time labor safety professional, this professional will be provided by the contractor, remaining at the Plant for the entire duration of the contracted work.

Prior to the signing and awarding contractor contracts, the contractor will supply Macaé Merchant Power Plant with the following documents:

- Resumé of each supervisor responsible for the services at the Plant.
- Name of the professional in charge of Labor Safety at the Plant and qualifications (if not the same person mentioned in the original proposal).
- Environmental Risk Prevention Program - PPRA - of the subcontractor, specific for the services to be rendered, including the following items:
  - instruction and continuous training in hygiene and safety;
  - danger warnings and Plant evacuation training;
  - procedures for first aid and medical assistance;
  - suppression/prevention of fires;
  - personal protection equipment requirements;
  - analysis of task safety;
  - report of unsafe conditions and actions;
  - procedures for notification and investigation of accidents;
  - environmental risk list and methods of control;

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- inspection methods for exposure of employees to hazards, and methods to control possible exposures to hazardous materials;
- specific programs for companies working in confined areas, excavations, load hoisting, hot work, protection against falls, blocking/locking of machines with padlocks and warning labels;
- emergency procedures in case of disasters, such as fires, hazardous fluid spills, toxic gas leaks, storms, serious accidents, etc.; and,
- A list of subcontractor employees with the right to access the Plant, including casual workers / non-permanent employees, with name, badge number, date of birth and years of experience in the function.

The subcontractor will produce evidence that, all employees with access to the Plant have completed training in "Safety Guidelines for New Employees".

Before beginning work at the Plant, a pre-mobilization meeting will be held, attended by both the subcontractor Manager / Supervisor and the Plant Management.

After completing all preliminary requirements and before starting work, all employees will participate in training on the risks inherent to their jobs and the use of personal and collective protection equipment available at the Plant. This training will be given in compliance with O-EP 008.

Prior to the start-up of any contracted work, contractors will attend a meeting or session reviewing the following:

- Location and facility information (including emergency responses, specific hazards and protective measures);
- Applicable operating and EHS procedures;
- Personnel in authority;
- Reporting procedures; and

- Scope of work.

The Supervisors managing contract operations have the responsibility of ensuring that HSE requirements agreed upon by contract are being implemented, even at the risk of lost operating time.

The Plant Manager, the Environmental Coordinator, the HSE Supervisor and the contractor are jointly responsible for monitoring and evaluating the work-in-progress, as well as managing changes within the work plan. The contractor management procedures should include, at least:

- Regular informal jobsite reviews (ie. "walk-throughs");
- Periodic formal inspections (ie. formally-documented regular inspections evaluating compliance with the required procedures / programs);
- Participation in regular environmental and safety meetings;
- Incident/injury reporting; and
- Final evaluation.

The final evaluation of the environmental and health & safety performance of the contractor should be completed at the end of the job or expiry of the contract. The evaluation can be in addition to or as a part of other contract evaluation close-out documentation. The environmental and health & safety requirements to consider include:

- Performance with regard to contractual requirements;
- Injuries/illnesses and emergency occurrences;
- Training provided; and
- Citations and/or awards received.

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**CONTRACTORS MANAGEMENT**

The results of the evaluation shall be taken into consideration for subsequent bids received from the contractor.

**8. Record Keeping**

Revision Date	Description	Section Affected

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**CONTRACTOR SAFETY QUESTIONNAIRE**

**NOTE: This survey is to be completed and returned with your quotation.**

**COMPANY NAME:** \_\_\_\_\_

**1. Nature of Business**

- Construction/Installation
- Maintenance
- Service
- Other (please describe): \_\_\_\_\_

**2. Past Safety Performance**

Number of lost-workday cases in the past two years:  
 Number of fatalities in the past five years:  
 Number of employees:

**3. Does your company have a written Safety Program?**

YES  NO

**4. Does your company have a written Hazard Communications Program?**

YES  NO

If yes, please submit a copy of the program.

**5. Does your Company have an orientation program for new employees?**

YES  NO

**6. If yes, does it include instruction for the following?**

	YES	NO		YES	NO
Head protection			Emergency procedures		
Eye protection			Toxic substances		
Hearing protection			Trenching and excavation		
Respiratory protection			Signs, barricades and flagging		
Safety belts and lifelines			Electrical safety		
Scaffolding			Rigging and crane safety		
Perimeter protection			Lockout/Tagout		
Housekeeping			Confined space entry		
Fire protection			Other (please identify)		
First Aid facilities					

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**7. Do you have a Training Program for Firemen or Leaders?**

YES  NO

If yes, does it include instructions on the following:

	YES	NO		YES	NO
Safe work practices			Accident investigation		
Safety supervision			Fire protection and prevention		
Tool box meetings			New worker orientation		
Emergency procedures			Other (please identify)		
First Aid procedures					

**8. Do you hold HSE meetings?**

YES  NO

If yes, how frequently?

Daily	Weekly	Bi-weekly	Monthly	As needed	Other

**9. Do you conduct Project Safety Inspections?**

YES  NO

If yes, who conducts the inspections?

(Title): \_\_\_\_\_

How often? \_\_\_\_\_

**10. Do you have an individual assigned to 'Safety Responsibilities' in your organization?**

YES  NO

If yes, what percentage of their time is devoted to Safety Responsibilities activities?

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**11. Do you require a pre-hiring physical?**

YES  NO

If yes, does it include:

	YES	NO
Drug screening		
Pulmonary function test		
Audiometric testing		

**12. Do your employees work in areas or situations where Respiratory Protection is required?**

YES  NO

If yes, do you provide:

	YES	NO
Fit testing		
Pulmonary function test		
Medical evaluation		

**13. Have you read and do you understand the “Rules, Regulations, and Requirement for Contractors and Subcontractors” governing activities at the plant?**

YES  NO

Name of individual completing questionnaire: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Date: \_\_\_\_\_

DEVELOPED BY	REVIEWED BY	APPROVED BY