

## Nanjing Kumho Tire Company

### Environmental Corrective Action Plan

Date: September 11, 2003

	Description	Starting Date	Completion Date
1	Adjust boiler burners to reduce NO <sub>x</sub> emissions to 420 mg/Nm <sup>3</sup> or below, the locally permitted standard.	October 2003	June 2005
2	Measure particulate emissions from boilers, and if necessary adjust burners or take other measures to achieve emissions of 100 mg/Nm <sup>3</sup> or less	October 2003	
3	Monitor coliforms in effluent	October 2003	
4	If monitoring shows this to be necessary, commission effluent disinfection system to control coliforms below 400 MPN/100 ml.		June 2005
5	Monitor metals, in particular zinc in effluent.	October 2003	
6	Investigate and implement cost-effective water-saving measures, particularly through housekeeping opportunities.	October 2003	June 2006
7	Develop management procedures including a hazmat risk management plan for gasoline, HCl & NaOH.		June 2004
8	Regularly check fuel stocks and fuel additions and withdrawals from underground tank, to provide rapid notification in the event of leakage.	October 2003	
9	Construct secondary containment walls around acid and caustic soda tanks.		June 2005
10	Apply for and obtain certification of environmental management system to ISO 14001 or equivalent.	September 2004	September 2005
11	Develop health and safety management system and seek certification to OHSAS 18001 or equivalent, or combine with environmental management in an integrated management system.	October 2005	September 2006