

**LEBEDYANSKY ENVIRONMENTAL AND SOCIAL ISSUES CORRECTIVE ACTION PLAN (CAP)**

#	Task Description	Required Completion Date
1.	<p><u>Air Emissions Data.</u> Submit stack emissions data for all boilers for the following parameters: NOx, SOx, and particulate. Submit quantitative data in mg/Nm3 format comparable to IFC guidelines limits.</p>	<p><b>May 2004</b></p>
2.	<p><u>Heavy Fuel Oil Spill Retention Containment.</u> Spill retention containment walls for heavy fuel oil above ground tanks have been breached for piping. Repair all containments to ensure the viability of secondary containment to contain the contents of the tanks in case of leaks or spillage. Provide means to remove clean, storm water accumulated inside the containment area.</p>	<p><b>May 2004</b></p>
3.	<p><u>Storm Water Management. Contract professional hydrogeological consulting services for evaluation of existing storm water accumulation and disposal area.</u> Sign contract with qualified hydrogeological consulting firm to provide the following hydrogeological consulting services: investigate current storm water disposal area reportedly situated one (1) kilometer distance from the Don River; consultant's evaluation shall define the existing technical function and ultimate destination of storm water disposed at this location; continuing technical viability of storm water disposal at this location; continuing and predicted long-term capacity of the disposal/recharge area to function adequately considering the existing quantity and quality of storm water discharged; develop recommended corrective measures for continuing use of the disposal area considering that direct discharges to the Don River must comply with World Bank surface water discharge requirements;</p> <p>If the consultant's recommendation is to cease utilization of the disposal area, carry out the tasks described in task numbers 6, 7 and 8 below.</p>	<p><b>Sign Contract 01 May 2004</b></p> <p><b>Deliver Report 15 September 2004</b></p>
4.	<p><u>Implement Consultation Recommendations for Continuing Use of Storm Water Disposal/Recharge area.</u> If the hydrogeological consultant's report described above allows continued use of the existing disposal/recharge area for Lebedyansky storm</p>	<p><b>Complete all hydrogeological consultant recommendations and action items</b></p> <p><b>31 December 2004</b></p>

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	water disposal with completion of specific technical modifications, implement all technical recommendations to ensure viability of the disposal./recharge area.	
5.	<p><u>Hydrogeological Consultant signature approval of completed disposal/recharge area modifications for Lebedyansky storm water disposal.</u> Obtain hydrogeological consultants signature approval indicating that recommended modifications described in the report and in #4 and #3 above have been completed to his satisfaction.</p>	<p><b>15 January 2005</b></p>
6.	<p><u>Prepare Storm Water Monitoring and Management Program Standard Operating Procedure (SOP).</u> Develop a storm water management program defined in a standard operating procedure (SOP) that shall be incorporated into the standard operating procedures developed for ISO-9001-2000 certification. The procedure will describe sample collection and monitoring programs to define the quality of storm water and to build a database of storm water volume and quality.</p> <p><u>Provide IFC with a copy of a signed turnkey contract</u> with a qualified civil engineering and construction company to collect required site data, characterize storm water quality, segregate storm water from process water sent to the Vodakanal, design and ultimately build storm water management facilities to ensure compliance with IFC guideline limits for discharge to surface water prior to discharge to the Don River. Final design of storm water quarantine and treatment facilities will be generated after the completion of quality and volume characterization studies are completed.</p>	<p><b>September 2004</b></p>
7.	<p><u>Storm Water Monitoring Program</u> Carry out a detailed storm water sampling and analysis campaign to define the quality of storm water and to build a database of storm water volume and quality coming from Lebedyansky operations. The data collected in this campaign will be used to complete design of physical facilities required to collect and to quarantine storm water and to provide any required treatment (e.g. sedimentation of</p>	<p><b>November 2004</b></p>

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	suspended solids) needed to ensure that storm water discharged to the Don River meets IFC discharge limits for treated effluent.	
8.	<u>Build storm water management facilities.</u> Construct physical facilities required for treatment of collected storm water to remove silt (e.g. decantation, sediment settling, etc.) and other contaminants in storm water prior to discharge to Don River. Submit designs and photographs of completed works including sampling locations and sedimentation facilities.	<b>October 2005</b>
9.	<u>Management of Organic Fruit Waste.</u> In collaboration with the local Agricultural Academy complete design and implement required activities to convert seasonal fruit and other organic wastes to animal feed or other useable byproducts (e.g. compost, fertilizer, soil amendment). Terminate landfill disposal of organic fruit waste.	<b>April 2006</b>
10.	<u>Enhance ISO 9001 Certification; Integrate Occupational Health and Environmental Management.</u> Enhance existing ISO 9001-2000 certification to incorporate and to integrate occupational health and safety and environmental management procedures into the system. Structure the modifications to obtain ISO 14001 environmental management certification. Obtain OHSAS 18001 certification of occupational health and safety management system.	<b>April 2007</b>
11.	<u>Occupational health and safety audit; complete all indicated corrective actions required to comply with IFC Occupational Health and Safety guideline.</u> Using a qualified occupational health and safety professional and a qualified auditor, conduct a detailed audit of existing operations to identify gaps between existing operations and the requirements of IFC's systematic management of occupational health, safety and operations defined in IFC's Occupational Health and Safety guideline. Correct all identified deficiencies.	<p><b>Complete Occupational Health and Safety Audit April 2004</b></p> <p><b>Correct all Occupational Health and Safety Deficiencies Defined in the Audit April 2005</b></p>

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12.	<u>Correct Work Place Deficiencies Noted in occupational health and safety audit performed by Local Oblast authorities.</u> Correct deficiencies and implement recommended corrective measures noted in the recently completed occupational health and safety audit of the plant (e.g. noise, temperature, vibration, and lighting).	<b>July 2004</b>