SA SAN MIGUEL CORRECTIVE ACTION PLAN

Task	*Indicator of Completion*	*Required Completion Date*	*Completion comment*
1. **Obtain Regulatory Approval for Wastewater Management Program**. Obtain local regulatory agency approval for proposed wastewater treatment plan and proposed timing to meet local wastewater treatment requirements.	Obtain regulatory agency approval letter stating acceptance of proposed wastewater management program and completion dates.	January 2005	
2. **Complete Environmental Assessment of Wastewater Management System and Facility Consolidation.** Complete Environmental Assessment for Famailla expansion and wastewater management program;	Obtain approval letter accepting assessment study and proposed mitigation measures;	February 2005	
3. **Install Wastewater treatment Phase I.** Complete installation of homogenization and equalization system and installation of dissolved air flotation system (DAF) at the Famailla plant.	Provide photo documentation evidence of installation project prior, during and after construction; submit analytical results of influent and effluent wastewaters from the DAF. Evidence of commitment of ~$700,000 required for system.	July 2005	As a condition for First Disbursement, a purchase agreement for the acquisition of the DAF shall have been entered into with a reputable supplier, specifying non-refundable payments ("Take or Pay"), and payment and delivery schedules
4. **Implement Clean Production Program.** Implement clean production engineering program to ensure that expanded installation at Famailla will reduce to the degree feasible process water use and industrial wastewater production.	Provide documented collaboration of San Miguel Technical Services Department with FMC and other equipment manufacturers to define and to implement water saving and wastewater reducing devices and configurations to the extent feasible without jeopardizing HACCP certification.	August 2005	On January 2005 we will start with the local Clean Production Program for both industrial plants. Documented evidence of the Clean Production Program and its implementation shall be submitted before proceeding to step 5 below.
5. **Consolidate Industrial Lemon Processing at Famailla.** Relocate industrial processing equipment from La Valle to Famailla operations	Provide photo documentation evidence of installation project prior, during and after construction;	Start: September 2005 Completion: February 2006	
6. **Demonstrate Phase I Treatment Process Effectiveness.** Demonstrate adequate DAF operations at Famailla to effectively treat the ~400 m3/hour effluent generated by industrial equipment from La Capital (Tucumán) and Famailla industrial operations	Submit quantitative analytical results of influent and effluent wastewaters from the DAF; provide influent and effluent quantitative flow data.	September 2006	By September 2005, a report shall be submitted analyzing the performance of the DAF during the 2005 season. By September 2006, demonstrate adequate DAF operations at Famailla to effectively treat the ~400 m3/hour effluent generated by industrial equipment
7. **Organic Solids Management**. Implement solids management system for DAF and subsequent unit processes-removed wastewater solids.	Design, installation and operation of a system to facilitate reuse of solids for agricultural or animal husbandry purposes and eliminate landfill disposal of collected solids.	April 2006	
8. **Revise La Valle (Tucumán)**	Existing activated sludge	December 2005	

Wastewater Management System. Revise wastewater treatment system at La Capital Federal (Tucumán) plant to treat wastewater from fresh fruit processing and other plant activities.	treatment works adapted to modified effluent volume and characteristics resulting form relocation of La Capital Federal industrial equipment to Famailla operations.		
9. **Order Phase II Anaerobic Reactor.** Place order for Anaerobic Reactor to treat effluent from DAF at Famailla	Evidence of commitment and dedicated expenditure of required funds.	October 2006	As a condition for disbursement of the last US$5 million, a purchase agreement for the acquisition of a suitably designed Anaerobic Reactor shall have been entered into with a reputable supplier, specifying non-refundable payments ("Take or Pay"), and payment and delivery schedules
10. **Install Anaerobic Reactor.** Install anaerobic reactor; complete startup and demonstrate efficient operations.	Submit analytical results of influent and effluent wastewaters from the anaerobic reactor; provide data for design of biological treatment system.	April 2007	San Miguel shall also estimate CH4 production from the Anaerobic Reactor @ 70% biogas, and evaluate the potential for greenhouse gas credit.
11. **Install Phase III of Wastewater Management Scheme**. Install, startup and fine tune operation of the third phase of the industrial effluent wastewater management system consisting of biological treatment to produce a final effluent in compliance with Argentine regulatory and IFC guideline limits. A non-energy intensive system (e.g. ponds) is the preferred alternative to manage phase III of industrial wastewater and off season wastewaters not requiring treatment if phase I and phase II unit processes.	Treated effluent complies with Argentine regulatory and IFC guideline limits for COD, BOD_5 and suspended solids	April 2007	Phase II and phase III shall be conducted in parallel, given that when phase II is designed, the volume and quality of effluent wastewater from the Anaerobic Reactors will be known. This technical knowledge will allow the design and implementation of the aerobic treatment simultaneously.