

Nghi Son II, Corrective Action Plan (CAP)

	Environmental Issue/Plant Feature	Corrective Actions Required	Timetable Milestones/Events
	Nghi Son Corporate/Company Wide.		
1	Maintain and continuously improve an Environmental, Health and Safety Management System (EHS MS).	Provide the necessary training and monitoring of environmental, health and safety (EHS) performance to ensure a formalised system, equivalent to ISO 14001, is maintained at all operations, existing as well as new.	Ongoing
2	Cement dust is released when road tankers overfill when trucks are returning to the filling station for a second filling.	Improve the operational practice to either avoid trucks returning for a second filling or improve the filtering systems to capture any overfilling releases caused by such second filling.	Fully implemented at all facilities by December 2008
	Nghi Son Cement Manufacturing Plant		
3	The clinker manufacturing kilns (both existing and new) to be equipped with continuously monitoring for particulate, nitrogen oxides, and sulphur dioxide to ensure optimal operation and continuous compliance with the emission requirements.	Install continuous monitoring for particulate, nitrogen oxides, and sulphur dioxide on the main stacks.	Before commissioning of the second kiln line, and to be verified at project completion.
4	Use quarry management and reclamation plans for ensuring optimal utilization of the resources, and ensure progressive landscaping and reclamation for mined out areas	Prepare quarry management and reclamation plans for the three quarry operations (limestone, clay, and silica sand). These plans should include a broad total quarry utilization plans, a five years oversight plan and a detailed utilization plan for the upcoming 12 months of operation.	A full set of the plans to be delivered to IFC for review by June 2008, and thereafter an ongoing procedure.
5	Waste water at the main facility in Nghi Son is treated to full compliance with Vietnamese standards before discharge. The discharge quality also fully complies with the IFC guidelines, except for e-coli counts which exceeds the guideline value of 400 MPN/100ml.	Take initiatives to bring the e-coli bacteria concentrations below the guideline limit, if needed by tertiary treatment or chlorination.	June 2008.
6	IFC has proposed to install waste-heat-to-power generating equipment on the new kiln line as well as the existing kiln line. Due to the low electricity	Nghi Son and IFC have agreed that the loan agreement for this loan will include specific financial conditions according to which the implementation of such generating facilities may be	Criteria to be reported in the Annual Monitoring Reports until triggered for

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	prices in Vietnam this is however not financially feasible at this time.	mandated.	implementation.
	Khanh Hoa Distribution Centre		
7	The new import jetty is to be constructed according to principles that will allow the continued free flow of the coastal currents	The jetty is to be constructed as a piled structure for the free flow of the coastal currents. No break water is foreseen.	Part of construction project, and to be verified before project completion.