

**Columbus (25912), Environmental and Social Action Plan – June 2009 Update**

Item	Action	Completion Indicator	Timetable
<b>PS1: Social and Environmental Assessment and Management Systems</b>			
1	Columbus will provide regular information to IFC on the status of its permits / approvals for water use, air emission (APPA) and waste storage.	Columbus has obtained its permits / approvals for water use, air emission (APPA), waste storages, and provided them to IFC. Permit to be provided include that related to: <ul style="list-style-type: none"> <li>• Air quality;</li> <li>• Water use; and</li> <li>• Waste storage.</li> </ul>	Provisional air quality permit to be provided prior to first disbursement. Final air quality permit to be provided following receipt from Government. Water use licence and waste storage permit to be provided following receipt from Government. Annual updates to be provided in AMR.
<b>PS2: Labor and Working Conditions</b>			
2	Columbus will extend the Occupational Hygiene Risk Exposure Profile (OHREP) to cover all contractor work areas and employees.  All contracts with contractors to require compliance with national Occupational Health and Safety (OHS) legislation.	2.1 Columbus has extended (or has caused to extend) OHREP and provided the profiles to IFC.  2.2 Provision to IFC of standard conditions of agreement with contractors defining applicable requirements.	2.1 By December 2009 2.2 By 1 August 2009.
3	Columbus will also ensure that adequate workplace monitoring is conducted by the main contractor operating in the plant area, particularly the contractors involved with slag management and waste management. Where applicable, Columbus will ensure appropriate action is undertaken where findings dictate.	Columbus has provided to IFC the workplace monitoring results.	OHS reports / risk assessments to be provided by 1 August 2009.  Annual updates to be provided in AMR.
4	Columbus will cause all on-site contractors to use adequate personal protective equipment, their workers to be subject to medical surveillance and examinations, and contractors to ensure safe working conditions to their workers.	4.1 Columbus has provided to IFC evidence that the conditions are met for all on-site contractors.  4.2 Following receipt of OHS reports / risk assessments by IFC, if required Columbus and IFC to agree on action plan to ensure	4.1 By 1 August 2009 / updates submitted via AMR thereafter. 4.2 By December 2009.

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		safe working conditions for contractors.	
<b>PS3: Pollution Prevention and Abatement</b>			
5	Columbus will revise the air quality monitoring program to ensure that representative testing is conducted and meets IFC ambient air, and air emission guidelines.	Following submission of air quality baseline study and stack emission monitoring reports to IFC, Columbus has revised the air emission monitoring program (if required) in agreement with IFC.	By 1 September 2009.
6	Columbus will assess the content of heavy metals in particulate matter emitted from existing stacks, as well as in ambient air PM10.	<p>6.1 Columbus has submitted the air quality baseline assessment and stack emission monitoring reports for the previous year to IFC.</p> <p>6.2 If heavy metals are present in the particulate matter in concentrations that may represent a health risk, Columbus has developed a plan to further reduce emissions which is in agreement with IFC.</p>	<p>6.1 By 1 August 2009.</p> <p>6.2 By 1 September 2009.</p>
7	Columbus will develop a Fugitive Dust Control and Abatement Program to reduce fugitive emissions from all areas.	<p>7.1 Columbus has developed and submitted a time-bound Program to IFC.</p> <p>7.2 IFC has reviewed and accepted the Program.</p> <p>7.3 Columbus has implemented the Program.</p>	<p>7.1 By 1 August 2009.</p> <p>7.2 By 1 September 2009.</p> <p>7.3 As per agreed Program timeline.</p>
8	<p>8.1 Columbus will update the air emission dispersion model following any significant change to operations that may affect emissions.</p> <p>8.2 Columbus will review the location of the monitoring station, to ensure that the monitoring data are representative of the air quality conditions at the closest residential receptors.</p>	<p>8.1 IFC has received the updated model as completed for commissioning of the new cold-rolling mill.</p> <p>8.2 IFC has received updated model following a major change in the emissive pattern due to modified plant operations.</p> <p>8.2 Columbus has reviewed the location of the monitoring station and provided evidence to IFC that the location is representative.</p>	<p>8.1 By 1 August 2009.</p> <p>8.2 One month following completion of revised modelling.</p> <p>8.2 By 1 September 2009.</p>

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9	<p>9.1 Columbus has developed a plan to install double HDPE liners with leachate control and underdrain control in all its storage ponds and dams which can be used to collect contaminated water.</p> <p>9.2 Columbus will also construct a new Dam 6 to collect all potential contaminated runoff from the slag management areas. Columbus will ensure that all slag material stockpiles are adequately stored within Dam 6 drainage area and stockpiles located outside this area are removed.</p>	<p>9.1 Columbus has installed the liners in all its storage ponds and dams.</p> <p>9.2 Columbus has constructed Dam 6 and all slag material stockpiles have been adequately stored.</p>	<p>9.1 All dams lined except clean water dams (2A &amp; B)</p> <p>9.2 Dam 6 to be constructed following receipt of water use licence. To be completed within 1 year of receipt of licence.</p>
10	<p>Columbus will add to its surface water monitoring network, two new stations along the Klein Olifants river, located immediately upstream and downstream of the confluence of Vaalbank spruit.</p>	<p>Columbus has started monitoring and provided the results to IFC.</p>	<p>By 1 August 2009.</p>
11	<p>Columbus will implement noise monitoring at plant boundaries.</p>	<p>11.1 Columbus to provide baseline environmental noise monitoring report to IFC and updates undertaken since this report.</p> <p>11.2 IFC to review information provided and propose action plan for environmental noise monitoring which is in agreement with Columbus.</p>	<p>11.1 By 1 August 2009.</p> <p>11.2 By 1 September 2009.</p>
12	<p>Columbus will provide the filter cake storage area with adequate containment to prevent contamination of runoff.</p>	<p>Columbus has installed adequate containment.</p>	<p>Complete.</p>
13	<p>Columbus will continue to work for the development of an Energy Reduction Investment Program.</p>	<p>13.1 Columbus to complete an investigation into opportunities to reduce energy consumption for submission to IFC.</p> <p>13.2 IFC and Columbus to agree on an action plan, if applicable,</p>	<p>13.1 By 1 August 2009.</p> <p>13.2 By 1 September 2009.</p>

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		to reduce energy consumption.	
<b>PS4 Community Health, Safety and Security</b>			
14	Columbus to provide copies of certifications / permits from all contractors transporting hazardous materials confirming compliance with national legislation. As and when contractors change, relevant documentation to be obtained and provided to IFC.	Submission of certifications / permits to IFC and risk assessment documentation Hydrogen Fluoride transportation routes.	By 1 September 2009. Updates to be provided via AMR.
<b>PS6 Biodiversity and Sustainable Natural Resource Management</b>			
15	Columbus will reinstate the old (primary) borrow pit, taking into consideration biodiversity protection elements.	The borrow pit has been reinstated.	As soon as Columbus receive Government approval.