

Armco (25956)
Environmental and Social Action Plan (ESAP)

	Action	Deliverable	Deadline
Environmental Management			
1.	Environmental management and licensing Armco will demonstrate adoption of ESMS procedures at Jacareí plant and seek site ISO 14000 certification Armco will provide copy of construction license as evidence for fulfillment of GoB requirements Armco will provide copy of operation license upon completion of construction and prior to startup	ISO 14000 certification of the Jacareí site Construction License Operation License	First Annual Monitoring Report By commitment First Annual Monitoring Report
Labor and working conditions			
2.	Labor policy Armco will establish a written policy statement governing overtime working.	Provide IFC the Labor policy for Extra hours	First Annual Monitoring Report
Pollution Prevention and Abatement			
3.	Liquid Effluents – Vila Prudente Armco will provide correction to pH 6-9 of process effluents arising from the Vila Prudente site.	Annual monitoring Report (AMR)	First Annual Monitoring Report (March 2009)
4	Liquid Effluents - Jacareí All liquid effluents arising from production processes and sanitary waste water shall be treated before discharge to meet IFC guideline requirements for discharge to surface waters, or if discharged to a sewer with further treatment, to the sewage system operator's acceptance criteria.	Annual monitoring Report (AMR)	Upon start-up of the Jacareí facility
5.	Air Emissions – Vila Prudente Armco will monitor emissions to air from annealing, galvanizing and quenching processes. Action to be taken as a result of this monitoring will be agreed with IFC.	Air emissions monitoring report	July 31 st 2008
6	Air Emissions - Jacareí	Annual monitoring Report (AMR)	Upon start-up of the

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	All point source emissions to air to be installed at the Jacareí facility shall be equipped if necessary with pollution control devices such that emissions to air meet local and IFC guideline requirements.		Jacareí facility

LS – Loan Signature