

PETLAS
Environmental and Social Action Plan

Date: February 19, 2008

Item	Description	Due Date
1	Conduct a comprehensive EIA study to include environmental, health, safety and social issues for the expansion project to meet IFC and local regulatory requirements. Communicate the report findings and action plan to IFC.	Condition of disbursement
2	Establish a contractor selection criteria for the construction of the new production plant and relevant facilities, based on health, safety and social performance giving priority to the certified contractors on international management systems; include health and safety procedures and insurance requirements into the contractor agreement to cover all employees working at the construction site; develop an internal regular inspection mechanism to ensure implementation of the agreement requirements. Communicate the draft agreement and procedures to IFC.	Condition of disbursement
3	Review provision of respiratory protection equipment and upgrade as indicated by risk (replacement of disposable dust masks by full face respirators at carbon black loading and at low mill area will be of priority until upgraded engineering solutions are available).	June 2008
4	Include pulmonary and hearing tests in pre-hiring medical examination.	June 2008
5	Develop a procedure to avoid purchasing of ozone depleting substances such as Freon in future operations.	June 2008
6	Complete installation of desulfurization unit for stack gases treatment to comply with the local regulations and the IFC guidelines. The new air emissions permit will be communicated to IFC. Extend air emissions monitoring to cover VOCs and other parameters according to the IFC standards and guidelines and if necessary devise measures to reduce emissions.	June 2008
7	Upgrade on-site drinking water supply system and wastewater disinfection system and install permanent monitoring system for current critical parameters. Review wastewater treatment and monitoring procedures, extend wastewater monitoring to cover parameters required by IFC guidelines and plan for further mitigation measures if necessary.	September 2008
8	Upgrade current air extraction/ventilation systems and illumination giving priority to carbon loading, low mill and curing areas.	September 2008
9	Review technical feasibility to replace highly hazardous organic chemicals giving priority to hexane and hydrazine and plan for replacements where possible.	September 2009
10	Commission a qualified professional to conduct an ATEX (Atmospheres Explosives) assessment of safety/explosion risk at current facilities where organic solvents or other flammable materials are used and implement relevant recommendations.	December 2008
11	Commission a qualified professional to review current fire detection and suppression systems, emergency egress, lighting and signage at the facilities and implement relevant recommendations.	December 2008
12	Implement a program to assess and upgrade machinery guarding at identified areas.	March 2009
13	Review current facilities and procedures related to the hazardous chemical storage and transfer to identify needs for taking action to ensure further soil and underground water pollution prevention.	June 2009
14	Achieve certification that the occupational health and safety management system elements meet the requirements of OHSAS 18001.	December 2009

Note: Items 1 to 2 are conditions of disbursement. Regarding the items from 3 to 14, the requirements of the assessments, upgraded systems and procedures, the coverage of the management system certificates for current operations will be extended to the new operations as necessary.