

Nitol

Table 1. Environmental and Social Action Plan

Division	Media	Action	Implementation Deadline
Usolyekhimprom	Liquid Effluents	Rebuilt the neutralization station	2010
		Design and rebuilt system to prevent water containing organic wastes to be discharged into the neutralization station	2010
		Rebuild the sanitary sewer system to avoid combined flow with the process/drainage water sewer system	2011
		Rebuild the liquid effluents network piping	2010
		Rebuild the sludge collector	2010
		Build a drainage ditch in the sludge lagoon to reduce chlorine concentrations	2011
		Design a system to reduce the concentrations of chloro-organic compounds from the liquid effluents from the production of epychlorohydrin, trichloethylene, vinyl chloride, hydrogen chloride, and PVC	2011
		Complete installation of mercury monitoring on-site and at the Bratskoye water reservoir	2009
		Reduce ammonia concentrations in wastewater	2012
		Repair cooling tower water circulation system from the for carbide furnaces	2011
	Air Emissions	Calcium hypochlorite dryer's reconstruction with sanitary column's installation	2011
		Install control systems to reduce dust emissions at the chlorine, vinyl chloride, epychlorohydrin and PVC processes	2010
		Reduce chlorine and hydrogen chloride releases from epychlorohydrin production	2009
		Reduce vinyl chloride emissions into the atmosphere	2012
	Wastes	Eliminate the presence of mercury from the PVC production discharge	2012
		Recover the of organochloride compounds from the waste generated at the epychlorohydrin production	2010
		Upgrade of vinyl chloride production to reduce waste generation and increase throughput	2010
		Upgrade of PVC production to reduce waste generation and increase throughput	2010
		Extract mercury from mercury bearing wastes from vinyl chloride production	2012
		Collect mercury waste for further reuse	2010
	Soil Contamination	Install double containment and impermeabilized flooring to all the ASTs that store raw materials, intermediate products, products, and fuel oil	December 2008
		Install oil traps on wells to prevent leakage of solvent on soil	2010
		Upgrade the pipelines conducting brine to storage tanks	2009

		Shut down wells No 1x, 2x, and 4x	2010
	Operation Safety	Demonstrate that the company completed the HAZOP and implemented recommendations	December 2008
	Labor Aspects	Prepare a retrenchment plan indicating the magnitude, rationale, and timeframe of the redundancies that already took place	December 2008
Usoliye-Sibirskiy Silicon	EIA for the PCS project	Submit copy of the EIA for PCS-300 and PSC – 3000:	July 2008 and/or prior first disbursement
	Community aspects	Submit summary of public hearings and how the Company satisfactorily addressed the community concerns	July 2008 and/or prior first disbursement
	Operations Safety	Demonstrate the company conducted the HAZOP for the TCS, PCS 300 and PCS 3000.	Prior commissioning of operations