

EXHIBIT IV.B – MAPPING OF ENVIRONMENTAL LIABILITIES, RECOVERY MEASURES AND MEDIATION

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EXHIBIT IV.B – MAPPING OF ENVIRONMENTAL LIABILITIES, RECOVERY AND MEDIATION MEASURES

1. PRESENTATION

- 1.1. This document indicates the ENVIRONMENTAL LIABILITIES existing along the CONCESSION AREA, Lines 11, 12 and 13.
- 1.2. The defined terms contained in this EXHIBIT shall have the meaning ascribed to them in EXHIBIT VII.
- 1.3. The situation of the contaminated areas was determined based on the results of the studies carried out for the CONCESSION AREA between 2009 and 2018, made available by CPTM, as briefly presented in (i) the Environmental Regularization Report of LINE 11, (ii) the Environmental Regularization Report of LINE 12 and (iii) the Basic Environmental Plan of LINE 13.
 - 1.3.1. For the period from 2018 until the publication of the PUBLIC NOTICE, the ENVIRONMENTAL LIABILITIES observed *in loco* and presented in this EXHIBIT considered the need for additional studies and surveys by the CONCESSIONAIRE, at its own risk, in order to determine the appropriate regularization solution, when applicable, applying, for this purpose, the risk sharing rules provided for in the AGREEMENT.

2. OBJECTIVE

- 2.1. The purpose of this document is to identify the environmental actions necessary to recover, mitigate and/or remedy the existing ENVIRONMENTAL LIABILITIES in the CONCESSION AREA.

3. METHODOLOGICAL ASPECTS

- 3.1. The ENVIRONMENTAL LIABILITIES presented herein were identified through technical inspections carried out in December 2023 and January 2024, along the OPERATIONAL RANGES.
- 3.2. In order to homogenize the characterization of each type of ENVIRONMENTAL LIABILITY, the information was consolidated in Registration Forms or "Liability Sheets", where the specific aspects that characterize each situation are indicated. These files can be found in APPENDIX 1 of this EXHIBIT.
- 3.3. The LIABILITIES were coded to organize the survey with the main information (date, location, type of occurrence, associated causes, among others).

3.4. The LIABILITIES found along the CONCESSION AREA were classified according to the following typology:

- AR = Areas with potential for rollover - e.g. lack or failures in fencing in places with risks of crossings
- AC = Area with Potential for Contamination
- DN = Natural drainage interference
- ER = Erosive Process
- ED = Effluents Discharge into the Operational Range
- MP = Inadequate Deposit of Hazardous Materials.
- IO = Informal Occupation in the Operational Range
- OT = Other (examples: areas with potential and flooding, areas with potential presence of friable asbestos)
- RE = Irregular Disposal of Waste in the Operational Range
- EG = Exposed Ground

3.5. The inclusion criteria for the items identified in this survey as ENVIRONMENTAL LIABILITIES were established based on technical discussions and the adaptation of the methodologies proposed by the Road Activities Manual (DNIT, 2006), as required by ISF-222: Environmental Component of Railway Engineering Projects (DNIT, 2015); and by the DER Project Instruction on the survey and registration of environmental liabilities (DER, 2007).

4. RESULTS OF THE SURVEY OF LIABILITIES

4.1. **Table 1**, below, presents the quantities of the typologies of the ENVIRONMENTAL LIABILITIES raised in the field inspections, according to their functional classification. It should be noted that the same liability can have more than one type registered.

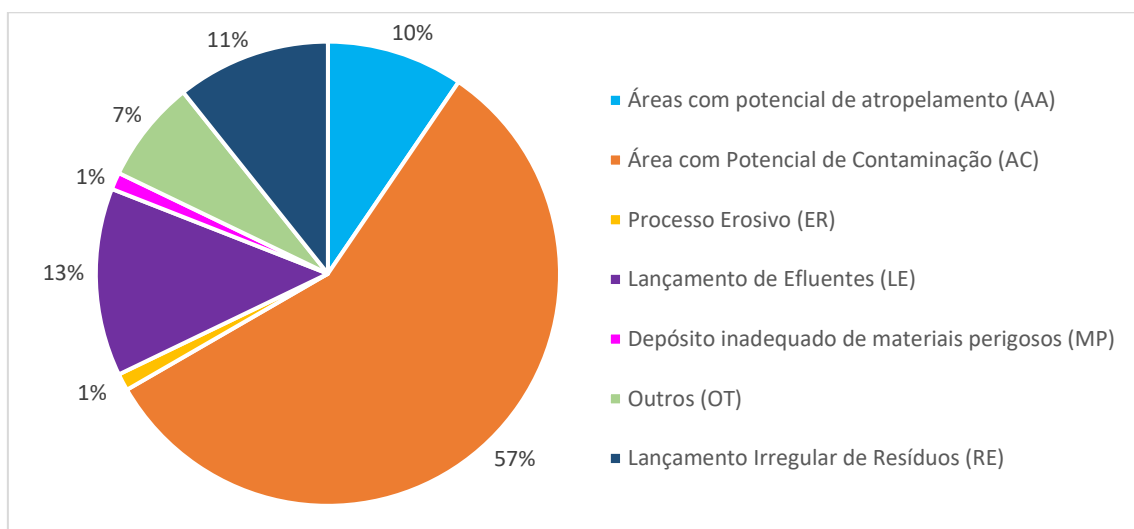
4.2. **Figure 1** presents the general distribution chart of the identified ENVIRONMENTAL LIABILITIES, according to their functional classification.

Table 1 - Total ENVIRONMENTAL LIABILITIES registered by typology

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Liabilities	Number of Records			
	LINE 11	LINE 12	LINE 13	TOTAL
Areas with potential for rollover (AR)	9	7	0	16
Area with Potential for Contamination (AC)	71	22	3	96
Natural drainage interference (DN)	0	0	0	0
Erosive Process (ER)	2	0	0	2
Effluent Discharge (ED)	9	13	0	22
Inadequate deposit of hazardous materials (MP)	2	0	0	2
Informal Occupation in the Operational Range (IO)	0	0	0	0
Others (OT)	9	1	0	12
Irregular Disposal of Waste (RE)	7	11	0	18
Exposed Ground (EG)	0	0	0	0
Total	109	54	3	166

Figure 1 - General distribution of the types of ENVIRONMENTAL LIABILITIES registered through field inspections



Source: ERM, 2024.

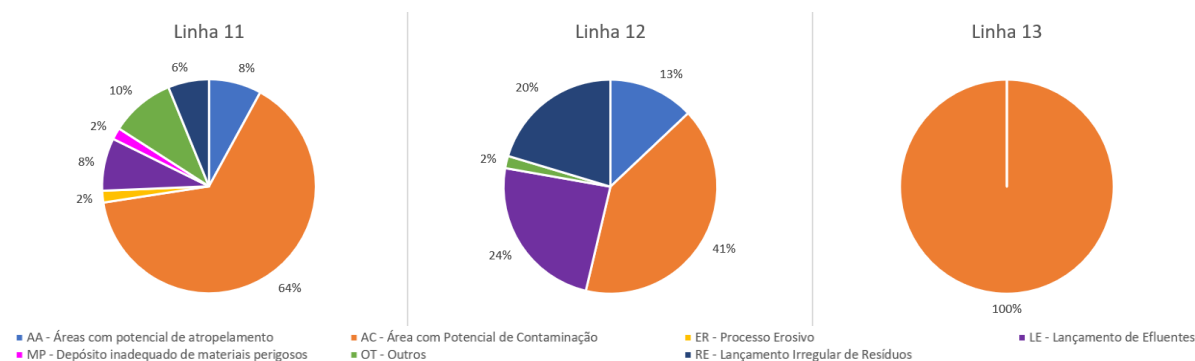
4.3. As shown in **Figure 1**, it can be seen that there is a predominance of liabilities related to Areas with Potential for Contamination (AC), representing more than half of the total (57%). Next are the liabilities related to Effluent Discharge (LE) with 13%, Irregular Disposal of Waste (RE) with 11%, Areas with Potential of rollover (AA) with 10%, Others (OT) with 7% and finally, Inadequate Deposit of Hazardous Materials (MP) and Erosive Process (ER), both with 1%.

4.3.1. Considering the category of liabilities related to Other (OT), the aspects identified were: i) use of potentially friable tiles with the potential to contain asbestos [8], and ii) areas at risk of flooding [2].

4.4. No liabilities associated with Natural Drainage Interference (DN), Informal Occupation in the Operational Range (IO) and Exposed Ground (EG) were identified.

4.5. **Figure 2** graphically presents the distribution of liabilities in each of the LINES.

Figure 2 – Distribution by line of the types of ENVIRONMENTAL LIABILITIES registered through field inspections (by line)



Source: ERM, 2024.

4.6. Regarding the liabilities related to the contaminated areas within the CONCESSION AREA, according to the information provided by the CPTM, 17 studies were carried out on the management of contaminated areas on LINE 11, six studies on LINE 12 and four studies on LINE 13. The summary of the results of the studies on contaminated areas in the CONCESSION AREA is presented in APPENDIX 2 of this EXHIBIT IV.B.

4.7. The studies carried out by CPTM and presented in (i) the Environmental Regularization Report of LINE 11, (ii) the Environmental Regularization Report of LINE 12 and (iii) the Basic Environmental Plan of LINE 13, indicated the occurrence of areas with potential for contamination (PA), areas suspected of contamination (AS) and contaminated areas (AC) as summarized in **Table 2**. These areas are also listed in Appendix 2.

Line	AC	AS	AP
Line 11	3	0	17
Line 12	2	0	5
Line 13	1	19	2
Total	5	19	24

4.8. In addition, it should be noted that during the modernization works of the Aracaré Station (Municipality of Itaquaquecetuba) a concentration of lead and nitrate was identified above the reference values established by CETESB Board Decision No. 038/2017/C. This work is included in the scope of the Environmental License for the Regularization of Line 12 – LOR No. 2754/2023

¹ According to information available in the *Environmental Regularization Report of Line 11*, *Environmental Regularization Report of Line 12* and *Basic Environmental Plan of Line 13*.

and the potential local contamination was communicated to CETESB through Official Letter No. 000111/2024-CPTM-GEA, filed by CPTM in October 2024 (Process SEI 386.00006405/2024-41).

5. TECHNICAL GUIDELINES FOR RECOVERY/REMEDIATION and MANAGEMENT OF ENVIRONMENTAL LIABILITIES

5.1. This item indicates the technical guidelines to be adopted for the management of each ENVIRONMENTAL LIABILITY according to each typology. The guidelines were based on CETESB's Contaminated Areas Management Manual.

5.2. Management of Contaminated Areas:

- Management and removal of potential sources of contamination according to CETESB's Contaminated Areas Management Manual²
- Management of the risk of contamination through the construction/installation of basins or containment devices, restoration of floors, application of waterproofing layer, among others in accordance with current legislation and specific NBRs (ABNT).
- Implement management measures in the storage areas of hazardous products/materials, the measures may also represent the installation of fire protection cabinets, construction of access barriers to the area in question, among others in accordance with current legislation and specific NBRs (ABNT).

5.3. Waste removal :

- It includes the characterization of the waste disposed of on the road/OPERATIONAL LANE, as well as the removal and environmentally appropriate disposal of the waste according to its classification, in accordance with current legislation and specific NBRs (ABNT).

5.4. Stabilization and monitoring of slopes and slopes:

- They comprise stabilization measures to be discussed with the engineering and monitoring team of the areas with evidence of erosive processes in order to ensure that it does not worsen, in accordance with current legislation and specific NBRs (ABNT).

5.5. Coordination with the City Hall:

² For more information on contaminated area management – CETESB: <https://cetesb.sp.gov.br/areas-contaminadas/documentacao/manual-de-gerenciamiento-de-areas-contaminadas/introducao-ao-gerenciamiento-de-areas-contaminadas/>

- It consists of engaging with the City Hall to regularize the effluent network of the communities adjacent to the road, in order to interrupt the release of effluents/rainwater in the CPTM Operational Range, in accordance with current legislation and specific NBRs (ABNT).

5.6. Sealing (Wall and Fencing) and Surveillance Actions:

- Considering the areas with potential for rollover identified, the measures should include, but not necessarily be limited to, the sealing of the strip, with complementation, reinforcement and maintenance of the boundary walls and frequent inspections of property surveillance, in accordance with current legislation and specific NBRs (ABNT).

5.7. Asbestos Inventory and Proper Disposal:

- In case large areas, such as maintenance yards and stations, have tiles with the potential to contain asbestos, an inventory must be carried out in order to confirm the presence of asbestos in these areas and the friable/non-friable classification. If this compound is identified in friable conditions, the fiber-cement tiles should be replaced by metal tiles. An Asbestos Management Plan is also applicable, in this sense, with mapping of the structures of interest, applicable legislation, procedures and mandatory Personal Protective Equipment (PPE), among other necessary aspects. In addition, in case of disposal of material containing asbestos, it must be handled and disposed of as hazardous waste, in accordance with current legislation and specific NBRs (ABNT).

5.8. Engineering Measures for Flood Prevention:

- They comprise preventive or mitigating measures to be discussed with the engineering team in order to prevent or minimize episodes of flooding of the road. Improvement in drainage devices and cleaning of existing channels are examples of measures to be discussed with the engineering team, in accordance with current legislation and specific NBRs (ABNT).

5.9. Table 3 is presented **below**, which indicates the total liabilities identified in the inspections (summarized in Table 1 of this exhibit) and the respective associated recovery/remediation guidelines.

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Table 3 – List of Environmental Liabilities in the CONCESSION AREA and Respective Guidelines for Recovery / Remediation

Line	Liabilities Code	Code/Post	Typology	General Technical Guideline ³
11	L11-AC-PTLZ-1	PTLZ-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTLZ-2	PTLZ-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-RE-00-01	00-01	Irregular Disposal of Waste	Waste removal, site cleaning, awareness campaigns with the community in accordance with current environmental legislation and ABNT standards (NBRs).
11	L11-AC-PTLZ-3	PTLZ-3	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTLZ-4	PTLZ-4	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.

³ The specific guidelines for each liability are presented in the respective liability sheets.

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Line	Liabilities Code	Code/Post	Typology	General Technical Guideline ³
11	L11-OT-PTLZ-1	PTLZ-1	Other	Carrying out an inventory of materials for identifying asbestos in its composition, considering the total size of the liability sheets associated with the theme and preparing an Asbestos Management Plan. If this compound is identified in friable conditions, it is recommended to replace fiber cement tiles with metal tiles in accordance with current legislation and ABNT standards. In this case, it is necessary to provide proper disposal of asbestos-containing materials, considering them as hazardous waste and to ensure EHS training for employees who will have contact with asbestos waste during removal activities.
11	L11-MP-PTLZ-1	PTLZ-1	Inadequate Deposit of Hazardous Materials	Adequacy of the hazardous materials storage area in accordance with current legislation and ABNT standards.
11	L11-OT-PTLZ-2	PTLZ-2	Other	Carrying out an inventory of materials for identifying asbestos in its composition, considering the total size of the liability sheets associated with the theme and preparing an Asbestos Management Plan. If this compound is identified in friable conditions, it is recommended to replace fiber cement tiles with metal tiles in accordance with current legislation and ABNT standards. In this case, it is necessary to provide proper disposal of asbestos-containing materials, considering them as hazardous waste and to ensure EHS training for employees who will have contact with asbestos waste during removal activities.
11	L11-AC-PTLZ-5	PTLZ-5	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTLZ-6	PTLZ-6	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTLZ-7	PTLZ-7	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, actions to control and/or remediate contaminated areas and/or the management of potential active sources

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Line	Liabilities Code	Code/Post	Typology	General Technical Guideline ³
				of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB
11	L11-AC-PTLZ-8	PTLZ-8	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-MP-PTLZ-2	PTLZ-2	Inadequate Deposit of Hazardous Materials	Adequacy of the hazardous materials storage area in accordance with current legislation and ABNT standards.
11	L11-AC-PTLZ-9	PTLZ-9	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTLZ-10	PTLZ-10	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTLZ-11	PTLZ-11	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.

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Line	Liabilities Code	Code/Post	Typology	General Technical Guideline ³
11	L11-AC-PTLZ-12	PTLZ-12	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTLZ-13	PTLZ-13	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTLZ-14	PTLZ-14	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017v and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTLZ-15	PTLZ-15	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-OT-PTLZ-3	PTLZ-3	Other	Carry out an inventory of materials for identifying asbestos in its composition, considering the total size of the liability sheets associated with the theme and preparing an Asbestos Management Plan. If this compound is identified in friable conditions, it is recommended to replace fiber cement tiles with metal tiles in accordance with current legislation and ABNT standards. In this case, it is necessary to provide proper disposal of asbestos-containing materials, considering them as

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Line	Liabilities Code	Code/Post	Typology	General Technical Guideline ³
				hazardous waste and to ensure EHS training for employees who will have contact with asbestos waste during removal activities.
11	L11-RE-PTLZ-1	PTLZ-1	Irregular Disposal of Waste	Waste removal, site cleaning, awareness campaigns with the community, in accordance with current legislation and ABNT standards.
11	L11-OT-PTLZ-4	PTLZ-4	Other	Carry out an inventory of materials for identifying asbestos in its composition, considering the total size of the liability sheets associated with the theme and preparing an Asbestos Management Plan. If this compound is identified in friable conditions, it is recommended to replace fiber cement tiles with metal tiles in accordance with current legislation and ABNT standards. In this case, it is necessary to provide proper disposal of asbestos-containing materials, considering them as hazardous waste and to ensure EHS training for employees who will have contact with asbestos waste during removal activities.
11	L11-AC-ESLZ-1	ESLZ-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTLZ-16	PTLZ-16	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTLZ-17	PTLZ-17	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTLZ-18	PTLZ-18	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of

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Line	Liabilities Code	Code/Post	Typology	General Technical Guideline ³
				contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTLZ-19	PTLZ-19	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESET-1	ESET-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESET-2	ESET-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-OT-ESET-1	ESET-1	Other	Carry out an inventory of materials for identifying asbestos in its composition, considering the total size of the liability sheets associated with the theme and preparing an Asbestos Management Plan. If this compound is identified in friable conditions, it is recommended to replace fiber cement tiles with metal tiles in accordance with current legislation and ABNT standards. In this case, it is necessary to provide proper disposal of asbestos-containing materials, considering them as hazardous waste and to ensure EHS training for employees who will have contact with asbestos waste during removal activities.
11	L11-AC-ESET-3	ESET-3	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real

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Line	Liabilities Code	Code/Post	Typology	General Technical Guideline ³
				risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESLZ-2	ESLZ-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESBR-1	ESBR-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-RE-ESBR-1	ESBR-1	Irregular Disposal of Waste	Waste removal, site cleaning, awareness campaigns with the community, in accordance with current legislation and ABNT standards.
11	L11-AC-ESBR-2	ESBR-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESCI-1	ESCI-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.

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11	L11-AC-ESTP-1	ESTP-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESDB-1	ESDB-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AA-02-27	02-27	Areas with Potential for Rollover	Sealing (Wall and Fencing) and surveillance actions in accordance with current legislation and ABNT standards.
11	L11-LE-05-08	05-08	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).
11	L11-LE-05-04	05-04	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).
11	L11-LA-08-12A	08-12A	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication and Environmental Education Program).
11	L11-AA-09-10	09-10	Areas with Potential for Rollover	Sealing (Wall and Fencing) and surveillance actions in accordance with current legislation and ABNT standards.
11	L11-AA-10-04	10-04	Areas with Potential for Rollover	Sealing (Wall and Fencing) and surveillance actions in accordance with current legislation and ABNT standards.

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11	L11-AA-09-16	09-16	Areas with Potential for Rollover	Sealing (Wall and Fencing) and surveillance actions in accordance with current legislation and ABNT standards.
11	L11-AA-11-20	11-20	Areas with Potential for Rollover	Sealing (Wall and Fencing) and surveillance actions in accordance with current legislation and ABNT standards.
11	L11-AA-13-20	13-20	Areas with Potential for Rollover	Sealing (Wall and Fencing) and surveillance actions in accordance with current legislation and ABNT standards.
11	L11-LE-12-10	12-10	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted. in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).
11	L11-ER-15-01	15-01	Erosive Process	Stabilization and monitoring of the area. in accordance with current legislation and ABNT standards.
11	L11-LE-24-40	24-40	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted. in accordance with current legislation and ABNT standards.
11	L11-LE-25-18	25-18	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted. in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).
11	L11-LE-26-06	26-06	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).
11	L11-RE-26-23	26-23	Irregular Disposal of Waste	Waste removal, site cleaning, awareness campaigns with the community in accordance with current legislation and ABNT standards.
11	L11-ER-27-15	27-15	Erosive Process	Stabilization and monitoring of the area in accordance with current legislation and ABNT standards.
11	L11-RE-28-11	28-11	Irregular Disposal of Waste	Waste removal, site cleaning, awareness campaigns with the community in accordance with current legislation and ABNT standards.
11	L11-LE-26-16	26-16	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).
11	L11-OT-30-09	30-09	Other	Develop strategies with the responsible engineering team to avoid or minimize the risk of flooding in accordance with current legislation and ABNT standards. In addition to engineering interventions, it is

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				recommended to carry out a Climate Risk study in order to map all the risks that may impact the operations of existing lines.
11	L11-AA-31-17	31-17	Areas with Potential for Rollover	Sealing (Wall and Fencing) and surveillance actions in accordance with current legislation and ABNT standards.
11	L11-RE-33-06	33-06	Irregular Waste Disposal	Waste removal, site cleaning, awareness campaigns with the community, in accordance with current legislation and ABNT standards.
11	L11-RE-36-21	36-21	Irregular Waste Disposal	Waste removal, site cleaning, awareness campaigns with the community, in accordance with current legislation and ABNT standards.
11	L11-OT-38-12	38-12	Other	Develop strategies with the responsible engineering team to avoid or minimize the risk of flooding in accordance with current legislation and ABNT standards. In addition to engineering interventions, it is recommended to carry out a Climate Risk study in order to map all the risks that may impact the operations of existing lines.
11	L11-AA-45-08	45-08	Areas with Potential for Rollover	Sealing (Wall and Fencing) and surveillance actions in accordance with current legislation and ABNT standards.
11	L11-AA-45-09	45-09	Areas with Potential for Rollover	Sealing (Wall and Fencing) and surveillance actions in accordance with current legislation and ABNT standards.
11	L11-AC-ESGS-1	ESGS-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESGS-2	ESGS-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESGS-3	ESGS-3	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB

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				presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESAG-1	ESAG-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESFV-1	ESFV-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESPO-1	ESPO-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESCV-1	ESCV-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESCV-2	ESCV-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources

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				of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESCV-3	ESCV-3	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESSZ-1	ESS-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESSZ-2	ESSZ-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-42-8A	42-8A	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESJP-1	ESJP-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real

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				risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-42-09	42-09	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESJP-2	ESJP-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESJP-3	ESJP-3	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESBC-1	ESBC-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.

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11	L11-AC-ESMC-1	ESMC-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-OT-ESMC-1	ESMC-1	Other	Carrying out an inventory of materials for identifying asbestos in its composition, considering the total size of the liability sheets associated with the theme and preparing an Asbestos Management Plan. If this compound is identified in friable conditions, it is recommended to replace fiber cement tiles with metal tiles in accordance with current legislation and ABNT standards. In this case, it is necessary to provide proper disposal of asbestos-containing materials, considering them as hazardous waste and to ensure EHS training for employees who will have contact with asbestos waste during removal activities.
11	L11-AC-ESMC-2	ESMC-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-ESMC-3	ESMC-3	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTCV-1	PTCV-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB

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				presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-CSMT-1	CSMT-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-SEPT-1	SEP-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTES-1	PTES-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTES-2	PTES-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTES-3	PTES-3	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources

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				of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-OT-PTES-1	PTES-1	Other	Carry out an inventory of materials for identifying asbestos in its composition, considering the total size of the liability sheets associated with the theme and preparing an Asbestos Management Plan. If this compound is identified in friable conditions, it is recommended to replace fiber cement tiles with metal tiles in accordance with current legislation and ABNT standards. In this case, it is necessary to provide proper disposal of asbestos-containing materials, considering them as hazardous waste and to ensure EHS training for employees who will have contact with asbestos waste during removal activities.
11	L11-AC-PTRO-1	PTRO-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTRO-2	PTRO-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTLZ-20	PTLZ-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-PTBR-1	PTBR-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of

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				contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-SEES-1	SEES-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-CSEG-1	CSEG-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-CSJP-1	CSJP-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-SEBC-1	ESCB-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-SEBC-2	ESCB-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the

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				possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-CSET-1	CSET-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-CSAA-1	CSAA-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-SEDB-1	SEDB-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-SEDB-2	SEDB-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.

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11	L11-AC-SEGS-1	SEGS-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-AC-SEGS-2	SEGS-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
11	L11-LE-SEGS-1	SEGS-1	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).
11	L11-AC-SEGS-3	SEGS-3	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-AA-09-01	09-01	Areas with Potential for Rollover	Sealing (Wall and Fencing) and surveillance actions in accordance with current legislation and ABNT standards.
12	L12-AA-09-19A	09-19A	Areas with Potential for Rollover	Sealing (Wall and Fencing) and surveillance actions in accordance with current legislation and ABNT standards.
12	L12-LE-10-26	10-26	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).

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12	L12-AA-25-07	25-07	Areas with Potential for Rollover	Sealing (Wall and Fencing) and surveillance actions in accordance with current legislation and ABNT standards.
12	L12-LE-25-8A	25-8A	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).
12	L12-LE-25-13	25-13	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).
12	L12-RE-26-03	26-03	Irregular Disposal of Waste	Waste removal, site cleaning, awareness campaigns with the community in accordance with current legislation and ABNT standards.
12	L12-AA-27-04	27-04	Areas with Potential for Rollover	Sealing (Wall and Fencing) and surveillance actions in accordance with current legislation and ABNT standards.
12	L12-OT-27-04	27-04	Other	Develop strategies with the responsible engineering team to avoid or minimize the risk of flooding in accordance with current legislation and ABNT standards. In addition to engineering interventions, it is recommended to carry out a Climate Risk study in order to map all the risks that may impact the operations of existing lines.
12	L12-RE-27-07	27-07	Irregular Disposal of Waste	Waste removal, site cleaning, awareness campaigns with the community in accordance with current legislation and ABNT standards.
12	L12-LE-27-11	27-11	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).
12	L12-AC-ESIP-1	ESIP-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-AC-PTIP-2	PTIP-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of

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				contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-AC-ESJH-1	ESJH-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-AC-ESJH-2	ESJH-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-AC-SEEM-1	SEEM-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-LE-21-16	21-16	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).
12	L12-RE-24-08	24-08	Irregular Disposal of Waste	Waste removal, site cleaning, awareness campaigns with the community in accordance with current legislation and ABNT standards.
12	L12-LE-29-07	29-07	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program,

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				Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).
12	L12-RE-29-28	29-28	Irregular Disposal of Waste	Waste removal, site cleaning, awareness campaigns with the community in accordance with current legislation and ABNT standards.
12	L12-RE-30-04	30-04	Irregular Disposal of Waste	Waste removal, site cleaning, awareness campaigns with the community in accordance with current legislation and ABNT standards.
12	L12-RE-30-06	30-06	Irregular Disposal of Waste	Waste removal, site cleaning, awareness campaigns with the community in accordance with current legislation and ABNT standards.
12	L12-RE-30-09	30-09	Irregular Disposal of Waste	Waste removal, site cleaning, awareness campaigns with the community in accordance with current legislation and ABNT standards.
12	L12-AC-ESJR-1	ESJR-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-AC-ESJR-2	ESJR-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-AA-31-19	31-19	Areas with Potential for Rollover	Sealing (Wall and Fencing) and surveillance actions in accordance with current legislation and ABNT standards.
12	L12-AC-ESMF-1	ESMF-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-AC-ESIT-1	ESIT-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real

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				risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-AC-ESIT-2	ESIT-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-LE-ESIT-1	ESIT-1	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).
12	L12-RE-36-06	36-06	Irregular Disposal of Waste	Waste removal, site cleaning, awareness campaigns with the community in accordance with current legislation and ABNT standards.
12	L12-AA-36-15	36-15	Areas with Potential for Rollover	Sealing (Wall and Fencing) and surveillance actions in accordance with current legislation and ABNT standards.
12	L12-RE-37-05	37-05	Irregular Disposal of Waste	Waste removal, site cleaning, awareness campaigns with the community in accordance with current legislation and ABNT standards.
12	L12-RE-38-09	38-09	Irregular Disposal of Waste	Waste removal, site cleaning, awareness campaigns with the community in accordance with current legislation and ABNT standards.
12	L12-LE-39-17	39-17	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).
12	L12-AA-34-04	34-04	Areas with Potential for Rollover	Sealing (Wall and Fencing) and surveillance actions in accordance with current legislation and ABNT standards.
12	L12-LE-10-30	10-30	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).

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12	L12-AC-ESEG-1	ESEG-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-LE-16-18	16-18	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).
12	L12-AC-ESUS-1	ESUS-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-AC-ESUS-2	ESUS-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-LE-18-4A	18-4A	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).
12	L12-AC-ESEM-1	ESEM-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources

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				of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-AC-ESEM-2	ESEM-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-RE-24-4A	24-4A	Irregular Disposal of Waste	Waste removal, site cleaning, awareness campaigns with the community in accordance with current legislation and ABNT standards.
12	L12-AC-ESSM-1	ESSM-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-AC-ESSM-2	ESSM-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-AC-ESSM-3	ESSM-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.

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12	L12-AC-SESG-1	SESG-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-AC-CSEG-1	CSEG-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-LA-ESMF-2	ESMF-2	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted in accordance with current legislation and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).
12	L12-AC-SEMF-1	SEMF-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-AC-SEMF-2	SEMF-2	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
12	L12-LE-ESIT-2	ESIT-2	Effluent Discharge	Coordination with the community and city hall so that the release of rainwater/effluents is interrupted in accordance with current legislation

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Line	Liabilities Code	Code/Post	Typology	General Technical Guideline ³
				and ABNT standards (scope of the corresponding PBA management programs - Environmental Construction Management Program, Environmental Control Program for Operation and Maintenance, Social Communication Program and Environmental Education).
13	L13-AC-ESGC-1	ESGC-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
13	L13-AC-ESAG-1	ESAG-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.
13	L13-AC-SEAS-1	SEAS-1	Area with Potential for Contamination	Carry out improvements in the area in question in order to remove the potential source of contamination and/or reduce the risk of contamination. Prepare assessments to confirm or rule out the possibility of contamination of the area and knowledge of the real risk/impact. If necessary, control and/or remediation actions of contaminated areas and/or the management of potential active sources of contamination must be implemented, in accordance with the guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB.

5.10. In general, for the management of all contaminated (or potentially contaminated) areas identified along the CONCESSION AREA, the determinations of the Contaminated Areas Management Program, an integral part of the Environmental Regularization Report of LINE 11, Environmental Regularization Report of LINE 12 and Basic Environmental Plan of LINE 13, must be followed. always in accordance with CETESB's Contaminated Area Management Manual.

5.11. The management of liabilities by the CONCESSIONAIRE, related to the existing and potential contaminated areas of the CONCESSION AREA, must follow the Guidelines for the Management of Contaminated Areas of CETESB presented in DD No. 038/2017/C, of February 7, 2017 and the Management Manual of Contaminated Areas of CETESB, in order to complement the studies and actions already initiated/carried out by CPTM and that may be requested by CETESB

throughout the year of the development of the concession.

6. RECOVERY/REMEDATION OBLIGATIONS

- 6.1. The obligations for recovery/remediation of the ENVIRONMENTAL LIABILITIES presented in Table 3 will be the responsibility of the CONCESSIONAIRE in accordance with the details below and the allocation of risks provided for in clauses 20.1.22, 21.1.31 and 22.4.2 of the AGREEMENT.
- 6.2. The CONCESSIONAIRE will be responsible for the recovery/remediation of the ENVIRONMENTAL LIABILITIES associated with (i) Areas with potential for rollover, (ii) Interference with natural drainage, (iii) Erosive Process, (iv) Inadequate Deposit of Hazardous Materials, (iv) Informal Occupation in the Operational Range, (v) Irregular Discharge of Waste in the Operational Range, and (v) Others.
- 6.3. For the remediation of ENVIRONMENTAL LIABILITIES related to the Effluents Discharge in the Operational Range, the CONCESSIONAIRE shall articulate with SABESP (the company responsible for the public sanitation services of all municipalities served by the LINES), with the support of the GRANTING AUTHORITY, to promote actions aimed at interconnecting these areas to the sanitation networks, prioritizing, whenever possible, facilities external to the CONCESSION AREA. It will be the responsibility of the CONCESSIONAIRE to seal the OPERATIONAL RANGE in order to cease the Effluents Discharge.
- 6.4. As for ENVIRONMENTAL LIABILITIES related to Areas with Potential for Contamination, it will be the responsibility of the CONCESSIONAIRE to carry out stages of the Contaminated Areas Identification Process, according to the Contaminated Areas Management Methodology⁴ summarized in the flowchart presented in **Figure 6.2.1**, in addition to the implementation of the respective containment and recovery measures. Pursuant to clause 21.1.31 of the AGREEMENT, the costs and delays arising from the recovery/remediation, by the CONCESSIONAIRE, of the areas whose contamination has been confirmed at the Aracaré Station constitute a risk for the GRANTING AUTHORITY. The associated risk/impact and remediation/recovery efforts must be dimensioned by the CONCESSIONAIRE within the scope of the Contaminated Areas Identification Process, as indicated in **Figure 6.2-1**.

⁴ <https://cetesb.sp.gov.br/areas-contaminadas/documentacao/manual-de-gerenciamento-de-areas-contaminadas/introducao-ao-gerenciamento-de-areas-contaminadas/metodologia-de-gerenciamento-de-areas-contaminadas/>

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INTERNATIONAL COMPETITION No. 02/2024
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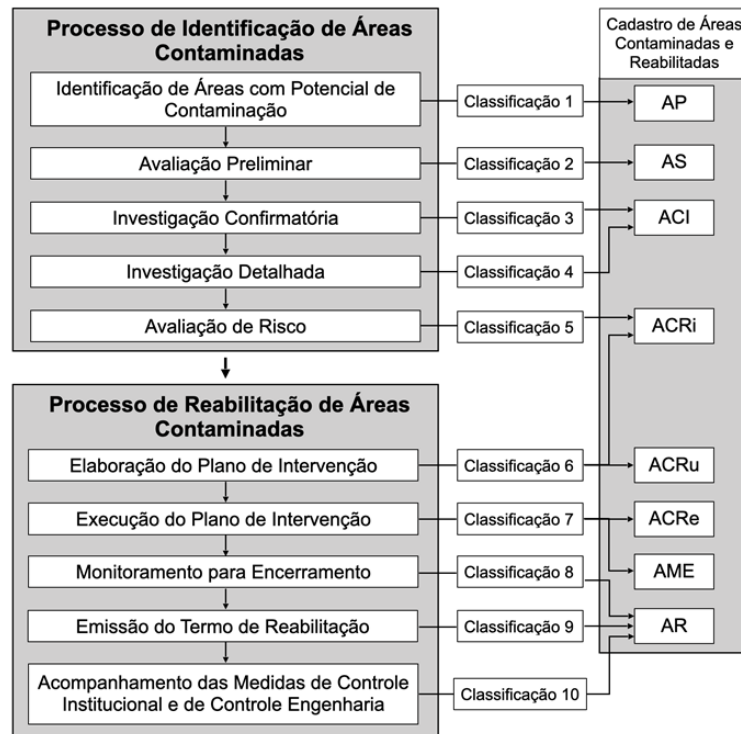


Figure 6.2-1. Contaminated Site Management Flowchart

- 6.5. The processes of identification and rehabilitation of contaminated areas currently under the responsibility of CPTM with CETESB and/or that have been identified up to the date of signature of the AGREEMENT, but not communicated to CETESB, will be the responsibility of the CONCESSIONAIRE, applying the rules provided for in the AGREEMENT regarding the allocation of risks related to such ENVIRONMENTAL LIABILITIES.