

***INTERNATIONAL CYANIDE  
MANAGEMENT INSTITUTE***

**Cyanide Transportation  
Summary Audit Report**

**Action Resources, Inc.**

*To The*

***International Cyanide Management Code***

**December 2016 Verification Protocol**

*By*

**Environmental Technology & Management**

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2323 Clear Lake City Boulevard, Suite 180-237, Houston, TX 77062-8032

(281) 480-8019

## SUMMARY AUDIT REPORT

Name of Cyanide Transportation Facility: **Action Resources, Inc. Pasadena Terminal**

Name of Facility Owner: **Action Resources, Inc.**

Name of Facility Operator: **Action Resources, Inc.**

Name of Responsible Manager: **Alex Valero, Terminal Manager**

Address: **5001 Underwood Road**

City: **Pasadena**

State/Province: **TX**

Country: **USA**

Telephone: **(281) 909-8080**

Fax: **(281) 930-4849**

E-Mail: **alex.valero@actn.com**

Location detail and description of operations:

On June 29, 2018 Environmental Technology & Management (ET&M) completed the on-site portion of the recertification audit of Action Resources, Inc.'s cyanide transportation activities against the Transport Practices of the International Cyanide Management Code. In 2013, a shipper began to use Action Resources, Inc. as a transporter of sodium cyanide briquettes from its Alvin, TX manufacturing plant to the Port of Houston for export to customers overseas. This is the first transportation segment in the shipper's Global Ocean Supply Chain. Action Resources, Inc. became a signatory to the Code in February 2015 and was certified in May 2015.

Action Resources, Inc., founded in 1995, provides transportation services of Specialty Chemicals and Hazardous Waste throughout the U.S. and Canada. All of its tractors are satellite equipped to provide real time communication and tracking of shipments from pick up to delivery. Action Resources' cyanide transportation activities are based at its **Pasadena Terminal**, and include transporting sodium cyanide (NaCN) briquettes in Sea Containers and ISO Tanks from the shipper's manufacturing facility, in Alvin, TX to Port of Houston container terminals and to other consignees. The shipper loads the briquettes into specially designed FIBC boxes, securely packed into 20' Sea Containers, or in bulk into ISO Tanks. The shipper's personnel, as well as Action Resources drivers, perform inspections on the container exteriors before leaving the production site.

To complete this first recertification audit, the ET&M Principal reviewed data on the more than 2,200 movements between the manufacturing plant, the Port of Houston and other consignees, as well as ISO tank washing facilities, over the three year cycle. Data reviewed verified that no driver in cyanide service transported loads without first receiving special cyanide training, and all were qualified. Furthermore, records verified that all tractors transporting cyanide met all regulatory and company requirements, including routine maintenance schedule.

Very few new consignees were added over this three year period, but Action Resources selected and evaluated a primary route to each of these consignees, subject to approval by the shipper. Details of the selection process are provided in this report. All routes follow major two lane roads and divided freeways and toll-ways in the United States and Canada, well travelled by chemical transporters. Action Resources provides a process in which drivers can report changes in route conditions which could affect transportation risk.

Action Resources, Inc.

Name of Facility




Signature of Lead Auditor

June 25-29, 2018

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This report provides the detailed findings regarding Action Resources, Inc.'s conformance to the requirements of the Cyanide Transportation Verification Protocol. Findings are based on over 2,200 movements by Action Resources, Inc. on behalf of the shipper completed over the three year cycle. There were no emergency incidents involving cyanide transportation during Action Resources' tenure.

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**SUMMARY AUDIT REPORT**  
*Auditor's Finding*

This operation is

- in full compliance
- in substantial compliance with the International Cyanide Management Code.
- not in compliance


**Audit Company: Environmental Technology & Management**  
**Audit Team Leader: John B. (Jack) McVaugh, PE, RCMS/EMS-LA**  
**E-mail: jbkm.etm@att.net**  
**Names and Signatures of Other Auditors: NA**


Date(s) of Audit: **June 25-29, 2018**

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

I further attest that Action Resources, Inc. has not experienced any significant accidents or incidents involving the transportation of cyanide during this three year cycle or prior to it.

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|-------------------------------|---|--------------------------|
| <u>Action Resources, Inc.</u> |  | <u>December 19, 2018</u> |
| Name of Facility              | Signature of Lead Auditor   | Date                     |

|                               |   |                         |
|-------------------------------|---|-------------------------|
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| Name of Facility              | Signature of Lead Auditor   | Audit Date              |

**SUMMARY AUDIT REPORT**

**1. TRANSPORT:** *Transport cyanide in a manner that minimizes the potential for accidents and releases.*

**Transport Practice 1.1:** *Select cyanide transport routes to minimize the potential for accidents and releases.*

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 1.1  
 not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

Action Resources, Inc. is in full compliance with Transport Practice 1.1. Action Resources, Inc. utilized its documented procedure, AR-EHSS-305, Cyanide Transportation Procedures to select cyanide transportation routes. The procedure calls for use of mapping software, the National Hazardous Materials Route Registry, and input from the shippers’ Risk Management and Logistics managers to select the safest transportation routes. Input was also received from the Houston Police Dept Commercial Truck Enforcement Division and from the City of Texas City on established routes for the transportation of hazardous materials through and around the cities of Houston and Texas City. Candidate cyanide transportation routes were surveyed by Action Resources’ Director of Transportation Safety to select routes that minimize the potential for accidents and releases as well as the potential impacts of accidents and releases, should they occur. Action Resources’ route selection process took into account population density, roadway infrastructure, construction and condition, pitch and grade and prevalence and proximity of water bodies and fog.

Action Resources utilized route selection software, data from the Houston Police Department and Texas City officials, route surveys by Action Resources, Inc.’s Operations and Safety functions and driver feedback to evaluate the risks of selected transport routes and took measures to manage these identified risks. Measures noted by the auditor included special instructions and cautionary notes on shipping papers. Instructions could also have included use of approved alternative routes during certain times of the year or when previously completed Sodium Cyanide Route Evaluation Forms indicate that road construction could affect the delivery. Interviews indicated that shipment departure times take into account Port of Houston operating hours, and could be adjusted to minimize hitting rush-hour traffic in certain areas along the routes.

Action Resources carried out an initial inspection of proposed routes by the Director of Transportation Safety or the Pasadena Terminal Manager. Thereafter, drivers were issued the Sodium Cyanide Route Evaluation Form to report any new construction activities, deterioration of surface conditions, posted detours or other conditions which, in their opinion, would contribute to an unsafe condition. According to the Action Resources Cyanide Transportation Procedure, such reports will trigger an immediate re-inspection by the Director of Transportation Safety and/or Terminal Manager to re-evaluate the route’s integrity. Based upon the re-evaluation, and weighting the perceived risk of any alternative routes, the



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existing route will continue to be used or an alternate route will be discussed with the Manager EH&S Compliance and the Logistics Manager of the shipper for their consideration and input.

Action Resources Cyanide Transportation Procedures call for input to be taken from the initial risk assessment, from periodic route reviews and from driver feedback to evaluate and re-evaluate routes and make changes. The Sodium Cyanide Route Evaluation Form may be used by drivers, the Director of Transportation Safety or Corporate Action Resources, Inc. personnel to document the evaluations. At the time the audit was conducted, conditions had not warranted completing the Sodium Cyanide Route Evaluation Form by drivers, but periodic re-evaluations had been conducted by the Director of Transportation Safety.


Action Resources Cyanide used software, which incorporates specific limitations, prohibitions and community requests. (See Transport Practice 1.1-1) The routes selected by this process are subject to the shipper's approval. Decisions are made with full awareness by Action Resources, Inc. and the shipper of the Community Right-to-Know and U.S. Department of Transportation (DOT) regulations. Local Emergency Planning Commissions (LEPC's), Fire and Emergency Response Authorities, and Emergency Medical Facilities have been informed of proposed or on-going transportation of NaCN to, or through, their areas. Concerns have been addressed either in writing or in person.

Although it does not appear to be applicable with existing routes, in the event of special safety or security concerns, Action Resources has expressed a commitment to consider additional risk mitigation measures such as escort services, convoy movement or route reassignment. Because of the relatively short routes between shipper and Port (75 miles or less), and limited access hours into the Port, team drivers are not necessary to prevent having to take long rest periods en route. Even the much longer route to Laredo, TX can be covered in a normal 10 hour work day. Furthermore, because of the volume of hazardous materials moved throughout these areas, convoys, escorts and other safety and security measures are not anticipated.

Action Resources, Inc. has retained OMI Environmental Solutions to provide emergency response and remedial services. The auditor verified that a contract is in place and that OMI's responsibilities have been clearly identified. Local Emergency Planning Commissions, Fire and Emergency Response Authorities, and Emergency Medical Facilities have been informed of proposed transportation of NaCN to, or through, their areas. Concerns have been addressed either in writing or in person. The auditor verified that Action Resources, Inc. maintains a list of current contacts and sent out information packets including NaCN Safety Data Sheets during this three year cycle.

Action Resources, Inc. transports cyanide, but otherwise does not handle it. Action Resources does not broker or subcontract loads to any other transport company. Some of Action Resources' drivers are contractors (Owner/Operators), but they are recruited, trained and qualified using the same procedures and standards as company drivers, to ensure that all applicable elements of this Transport Practice are met.

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***Transport Practice 1.2: Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.***

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 1.2  
 not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

Action Resources, Inc. is in full compliance with Transport Practice 1.2. Action Resources used only trained, qualified and licensed drivers, mostly independent Owner/Operators to operate its cyanide transport vehicles, over the last three years. Owner/Operators, their equipment and activities were required to meet the same standards of performance as company owned resources and company drivers with regard to DOT safety standards, training and job responsibilities. The auditor verified that Action Resources cyanide drivers met all applicable Federal Motor Carrier Safety Regulations, were at least 23 years of age, possessed a valid Class A Commercial Drivers License with Tank Truck and Hazardous Materials endorsements, and had a good driving record. If any of these qualifications lapsed, the dispatch system would not assign them to pull any loads. All drivers were subject to Action Resources, Inc. Employee Drug and Alcohol Abuse Program and background investigations, including that required for the Transportation Worker Identification Credential (TWIC) identification.


Furthermore, all drivers transporting cyanide received Cyanide Safety Awareness for Transporters training including reviewing the Cyanco Cyanide Safety video and passing a competency test, before pulling their first load. Drivers received training to perform their jobs in a manner that minimizes the potential for cyanide releases and exposures This included training required by the Occupational Safety & Health Administration (OSHA) 29 Code of Federal Regulations (CFR), the Department of Transportation (DOT) 49 Code of Federal Regulations (CFR) and Environmental Protection Agency (EPA) 40 Code of Federal Regulations (CFR) regulations, and the above mentioned Cyanide specific information before pulling any loads. Refresher and on-going training was provided by means of Quarterly Safety Meetings at terminals, interactive monthly computer-based training (CBT) and individual remedial training sessions, when necessary.

***Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.***

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 1.3  
 not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

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Action Resources, Inc. is in full compliance with Transport Practice 1.3. Action Resources has maintained tractor specifications and a maintenance program that ensures that its transport equipment retains a load-bearing capacity adequate for the anticipated load. This maintenance program included periodic inspections (120 days vs. the annual frequency required by US DOT), as well as appropriate specifications for equipment and parts that may be replaced during maintenance. Tractors owned by Owner/Operators were required to meet the same standards of design and maintenance as company power units. The shipper provided the intermodal chassis, ISO Tanks, Sea Containers and IBC's, and provided verification that equipment for which they are responsible meets appropriate construction and performance standards. Information on each tractor was entered into a database, including make, model, year, mileage, service and repair history. Tractors owned by Owner/Operators were required to meet the same maintenance schedule as company units, but were not required to have the work performed in an Action Resources shop. However, if the work was performed elsewhere, Owner/Operators were required to provide records of the work to the Action Resources shop. The TMT Fleet Maintenance System provided daily updates to the Shop Foreman regarding preventative maintenance schedules and required services, including annual inspection renewals. The shipper performed all cyanide loading according to its own procedures. Product weights were specified on shipping papers, and the shipper used its own scales to weigh empty and loaded ISO Tanks and Sea Containers, including chassis. Action Resources drivers checked the weights and verified conformance with weight limit requirements. Because some loads were slightly over the maximum weight limit for vehicles on the routes selected, Action Resources purchased state-issued Over Gross Weight Tolerance Permits and placed them on several company owned and Owner/Operator tractors to use whenever necessary to accommodate such loads. Some Owner/Operator tractors with Day Cabs were also used to transport heavier Cyanide shipments, as the lighter tractors precluded the need for Overweight Permits.

***Transport Practice 1.4: Develop and implement a safety program for transport of cyanide..***

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 1.4  
 not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

Action Resources, Inc. is in full compliance with Transport Practice 1.4. Action Resources and the shipper have procedures in place to ensure packaging integrity during transport. The shipper loads ISO Tanks and IBC's with briquetted product and in turn, loads IBC's into Sea Containers, blocking and bracing each load. Action Resources addresses placarding in its procedures. Placards are installed by the shipper's personnel and are checked by Action Resources drivers. Action Resources, Inc. drivers inspect loads before shipment by completing Driver Vehicle Inspection Reports (DVIR's) and the shipper's personnel and Action Resources drivers inspect each load as part of the Load Pick-Up Process. Preventive maintenance on company owned tractors is conducted at the Pasadena Terminal shop, as well as for Owner/Operator tractors at the Owner/Operators' discretion. Action Resources complies with Part 395 of the Motor Carrier Safety Regulations which places strict limitations on driving and on-duty hours. These are monitored automatically through a Qualcomm® Electronic Logging System. Transportation routes



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may be modified or suspended in situations of extreme weather or civil unrest. Onboard communication systems in all tractors provide a mechanism for alerting drivers and communication regarding alteration of pre-planned activities. Additionally, drivers are empowered to make decisions about suspending cyanide transportation for road or weather conditions or civil unrest. When travel on the approved route becomes difficult, Action Resources, Inc. drivers must contact their dispatcher by an on-board communication system. Over the past three years, no such route alterations had been necessary. However, if severe weather should threaten the safe operation of vehicles, Operations Management and Dispatchers communicate with customers regarding contingency scheduling. The Action Resources, Inc. Employee Drug and Alcohol Abuse Program includes Pre-employment, Random, Post-Accident, Post-Incident and Reasonable Suspicion drug screening. The auditor found all records reviewed to be complete and well managed. Action Resources retains preventive maintenance records, including histories on each piece of equipment, at the Pasadena, TX Terminal. Records relating to the Alcohol & Controlled Substance Testing Program, including consent forms, are maintained in personnel files at the Action Resources headquarters. Hours of Service (H-O-S) records are maintained in the Qualcomm® System, electronically, and a copy of the Driver's Vehicle Inspection Report is filed in the Terminal Maintenance Shop as records of maintenance work needed and completed.

***Transport Practice 1.5: Follow international standards for transportation of cyanide by sea and air.***

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 1.5  
 not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*


Since Action Resources, Inc. does not transport cyanide by sea and air, Action Resources, Inc. is in full compliance with Transport Practice 1.5.

***Transport Practice 1.6: Track cyanide shipments to prevent losses during transport.***

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 1.6  
 not in compliance with


*Summarize the basis for this Finding/Deficiencies Identified:*

Action Resources, Inc. is in full compliance with Transport Practice 1.6. Each tractor has been equipped with a satellite communication set (Qualcomm®) and an Electronic On-Board Recorder (EOBR) that allow for two-way communication between drivers and dispatcher while accurately tracking truck

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location, driver Hours of Service (H-O-S) and other data. In addition, each driver carries a cell phone. (Note that cell phone use is subject to the Action Resources, Inc. Distracted Driving Policy, which strictly prohibits the use of hand-held cellular devices while the vehicle is under way). Drivers are furnished with a list of phone numbers for the shipper, Terminal Manager, the Director of Transportation Safety and emergency phone numbers such as Chemtrec. Action Resources' Qualcomm® sets and EOBR's are in daily use, and if a failure occurs, electronic error messages are sent to Dispatchers and Operations personnel. Dispatchers have the cell phone numbers of each driver to ensure two-way communication if there is a system failure. Since Qualcomm® devices are essential for dispatch and H-O-S record keeping, Action Resources, Inc. must repair malfunctioning Qualcomm® devices as soon as they are returned to the Terminal. Because of the proximity of Producer and Port, and based on identified and approved routes, no blackout areas for either cellular or satellite communications have been encountered. The auditor verified that Qualcomm® tracks routes in real time, as well as location, direction, speed and position history of transport vehicles. Action Resources picks up Sea Containers and ISO Tanks fully loaded and sealed at the shipper's location and delivers them to the Port of Houston or consignee directly. The auditor verified that Seal Numbers were recorded on shipping papers and drivers verified that the seals were intact at the point they relinquish control. The Shipping Document or Manifest serves as a chain of custody document. Action Resources, Inc. indicates the amount of cyanide in transit on the Straight Bill of Lading, and ensures that the shipping papers include a Transportation Emergency Notification Sheet and SDS.

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**2. INTERIM STORAGE: *Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.***


***Transport Practice 2.1: Store cyanide in a manner that minimizes the potential for accidental releases.***

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 2.1  
 not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

Because Action Resources, Inc. does not operate any cyanide trans-shipping depots or interim storage sites, Action Resources, Inc. is in full compliance with Transport Practice 2.1.

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**3. EMERGENCY RESPONSE: *Protect communities and the environment through the development of emergency response strategies and capabilities.***

***Transport Practice 3.1: Prepare detailed emergency response plans for potential cyanide releases.***

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 3.1  
 not in compliance with


*Summarize the basis for this Finding/Deficiencies Identified:*

Action Resources, Inc. is in full compliance with Transport Practice 3.1. Action Resources has written a Cyanide Contingency Plan to notify Local Authorities, Emergency Response Providers, and Company Operations and Safety Management in the event of a release of sodium cyanide briquettes in transit. Drivers selected for transportation of sodium cyanide have been instructed in the Cyanide Contingency Plan, and a copy of the Plan is included in each driver’s Permit Book. The Plan has been reviewed and amended as needed. The Cyanide Contingency Plan specifies the use of OMI Environmental Solutions whose capabilities extend to all Action Resources’ areas of operation. The Plan also specifies emergency contact information appropriate for the transportation routes. No interim storage facilities are operated by Action Resources. The Cyanide Contingency Plan specifies that the product is sodium cyanide and the physical form is solid briquettes, and furthermore that the method of transportation is by truck, using chassis and ISO Tanks or Sea Containers. The Cyanide Contingency Plan considers highway transportation over the approved routes. Action Resources, Inc. does not transport by rail or water, and its involvement at the port or consignee is to position the trailer for off-loading by the port or consignee’s employees or contractors. The Plan considers that the transport vehicle will consist of a power unit, chassis, and ISO-Tank or Sea Container. The Cyanide Contingency Plan specifies response actions to be taken by Action Resources drivers and other personnel in the event of a release of sodium cyanide in transit, and that Emergency Response and Clean-Up Services defer to OMI Environmental Solutions for instructions.

***Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.***

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 3.2  
 not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

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Action Resources, Inc. is in full compliance with Transport Practice 3.2. Action Resources has provided emergency response training to the drivers selected for transportation of sodium cyanide, particularly with regard to implementation of the Cyanide Contingency Plan. Records verified that all cyanide drivers were trained on the Cyanide Contingency Plan before transporting their first load. Furthermore, Action Resources periodically reviews its Cyanide Contingency Plan and if the plan is amended, all drivers in Cyanide Service receive updated refresher training. The Cyanide Contingency Plan delineates the specific emergency response duties of drivers as well as emergency response personnel, including OMI Environmental Solutions. Each tractor carries the following emergency equipment: Gloves, safety glasses hard-hats, protective clothing, respirators, absorbent pads or booms, DOT Emergency Response Guidebook, ABC fire extinguisher, and emergency reflective triangles. However, drivers are instructed not to attempt containment or clean up of released material. OMI Environmental Solutions is to provide all necessary emergency response and health and safety equipment including personal protective equipment in the event of a release during transport. Before beginning their shift, all drivers test their cellular telephones by placing and receiving a voice communication with Dispatch. The auditor reviewed a list of response equipment provided to Action Resources by OMI Environmental Solutions in its 2018 Emergency Rate Schedule. Action Resources and OMI Environmental Solutions have committed to inspection of all emergency response equipment in conformance with company policies.


***Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.***

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 3.3  
 not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

Action Resources, Inc. is in full compliance with Transport Practice 3.3. Action Resources' Cyanide Contingency Plan clearly provides for notification of CHEMTREC, the shipper, 911 Emergency Services, the National Response Center, OMI Environmental Solutions and any other agencies necessary to mount an effective response. Terminal and Transportation Safety personnel maintain a list of emergency agencies and medical facilities covering each cyanide transportation route. Action Resources, Inc maintains the Cyanide Contingency Plan as part of its Standing Operating Procedures (SOP's). SOP's are dated with the date of their Origination and the date of their last revision or review. Review dates are noted in a task calendar database with automatic alerts to affected management personnel.

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***Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.***

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 3.4  
 not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

Action Resources, Inc. is in full compliance with Transport Practice 3.4. In the event of a release during transportation, Action Resources' drivers are instructed not to attempt any recovery or neutralization activities. Recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris will be the responsibility of OMI Environmental Solutions. Depending on the methods employed by OMI Environmental Solutions to contain and recover the released material, Action Resources is committed to making every effort to find a responsible user of the material in its intended commercial application. Failing that, Action Resources commits to arrange for destruction of the material by EPA approved methods. OMI Environmental Solutions has been instructed that the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into or near surface water is strictly forbidden.


***Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.***

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 3.5  
 not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

Action Resources, Inc. is in full compliance with Transport Practice 3.5. Action Resources maintains the Cyanide Contingency Plan as part of its Standing Operating Procedures (SOP's). SOP's are dated with the date of their Origination and the date of their last revision or review. Periodic reviews are scheduled in a task calendar database which sends out automatic reminders to affected management personnel. Action Resources has committed to conducting mock emergency drills with OMI Environmental Solutions and in conjunction with the shipper's Environmental, Health & Safety staff, if feasible. These drills simulate cyanide transportation related releases and exposures. The auditor reviewed records of past emergency drills conducted with the emergency response contractor and shipper, and noted that the transporter was planning another drill as this audit was being conducted. In the event the Cyanide Contingency Plan is implemented, Action Resources is committed to conducting Incident Investigation, including Root Cause Analysis, and After-Action-Reports as evaluation tools to determine the efficacy of the Plan. Revisions will be made as necessary. Any modifications to the Plan will trigger re-training for all Action Resources


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personnel affected. There have been no incidents requiring implementation of the Cyanide Contingency Plan since Action Resources began transporting cyanide.

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