



INTERNATIONAL CYANIDE MANAGEMENT CODE

CONTRANS S.A.C.

SUMMARY AUDIT REPORT

BASE PRODUCTION, CALLAO, LIMA, PERU

CODIGO 20552423993

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FECHA 05/10/2016

In collaboration with:



INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Production Operations Summary Audit Report



For The International Cyanide Management Code and CONTRANS S.A.C. – Callao – Lima – Peru Verification Protocol

www.cyanidecode.org

October 2016



OCTOBER 2016 | CONTRANS

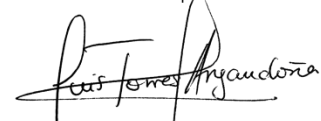

Lead Auditor Signature

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INTRODUCTION

Information on the audited operation

Name of Cyanide Transportation Facility: CONTRANS S.A.C.

Name of Facility Owner: CONTRANS S.A.C.

Name of Facility Operator: CONTRANS S.A.C.

Name of Responsible Manager: Neycer Chuquizuta C.

Address: Av. Oquendo Mza. H-L Fnd. Ex-Fundo Oquendo (Alt. Km 8.5 de Av. Nestor Gambetta)

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Aspects of the location and description of the operation:

CONTRANS SAC (hereinafter CONTRANS), with the aim of providing logistical services companies in different sectors. The company provides comprehensive logistics solutions storage, distribution, transportation.

The company has a 59,794.31m2 area where it has a variety of modular warehouses in various areas that meet the needs of its customers and container storage area, including warehouses for storage of sodium cyanide duly certified by the National Superintendency of taxation of Peru.

CONTRANS sodium cyanide stored in wooden presentation boxes for 1 TN, and cylinders 100Kg. The operation of CONTRANS includes management control Customs Transport (Port - Warehouse Callao), Storage Distribution (Download packages cyanide containers, storage packaging cyanide and loading packages of cyanide containers) and management control of Transportation distribution.

SUMMARY AUDIT REPORT
FOR CYANIDE TRANSPORTATION OPERATIONS

Instructions

1. The basis for the finding and/or statement of deficiencies for each Production Practice should be summarized in this Summary Audit Report. This should be done in a few sentences or a paragraph.
2. The name of the cyanide transportation operation, lead auditor signature and date of the audit must be inserted on the bottom of each page of this Summary Audit Report.
3. An operation undergoing a Code Verification Audit that is in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.
4. The Summary Audit Report and Corrective Action Plan, if appropriate, for a cyanide transportation operation undergoing a Code Verification Audit with all required signatures must be submitted in hard copy to:

International Cyanide Management Institute (ICMI)

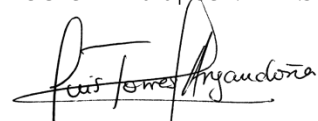
1400 I Street, NW, Suite 550

Washington, DC 20005, USA

5. The submittal must be accompanied by 1) a letter from the owner or authorized representative which grants the ICMI permission to post the Summary Audit Report and Corrective Action Plan, if necessary, on the Code Website, and 2) a completed Auditor Credentials Form. The lead auditor's signature on the Auditor Credentials Form must be certified by notarization or equivalent.
6. Action will not be taken on certification based on the Summary Audit Report until the application form for a Code signatory and the required fees are received by ICMI from the applicable cyanide transportation company.
7. The description of the cyanide transport company should include sufficient information to describe the scope and complexity of its operation.



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Auditor's Finding

This Operation is:

- ☒ in full compliance
☐ in substantial compliance
☐ not in compliance

The International Cyanide Management Code

with the International Cyanide Management Code.

Audit Company: ISOSURE SAC | CIANURO INCORPORATED EIRL

Audit Team Leader: Luis Torres Argandoña

E-mail: auditoria@iso-sure.com

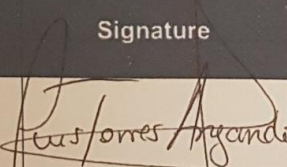
Date(s) of Audit: 05 and 06 October 2016

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.

Name and Signatures of Other Auditors

Name	Position	Signature	Date
Luis Torres Argandoña	Lead Auditor and Production Technical		06 October 2016



CERTIFICADO: QUE LA FIRMA QUE APARECE EN EL ANVERSO DEL PRESENTE DOCUMENTO CORRESPONDE A: **LUIS ALBERTO TORRES ARGANDOÑA** IDENTIFICADO CON DNI. N° 09993105; DOY FE. SE CERTIFICA LA FIRMA MAS NO EL CONTENIDO; SOBRE EL QUE LA NOTARIA NO ASUME RESPONSABILIDAD. LIMA, ONCE DE ENERO DE DOS MIL DIECISIETE.



CECILIA HIDALGO MORAN
 Notaria de Lima

CERTIFICACION DE FIRMA AL DORSO
 NOTARIA HIDALGO
 LIMA,

11 ENE. 2017

Verification Protocol

OPERATIONS

Design, construct and operate cyanide production facilities to prevent release of cyanide.

1.1 PRODUCTION PRACTICE 1.1

DESIGN AND CONSTRUCT CYANIDE PRODUCTION FACILITIES CONSISTENT WITH SOUND, ACCEPTED ENGINEERING PRACTICES AND QUALITY CONTROL/QUALITY ASSURANCE PROCEDURES.

X in full compliance with

The operation is ☐ in substantial compliance with Production Practice 1.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.1 requiring an operation design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.

The construction of storage facilities of CONTRANS for storage and transfer facility of sodium cyanide were approved by the District Municipality of Callao, Callao, Peru, and subjected to quality control of municipal inspectors and customers of CONTRANS. The designs and drawings submitted were approved under the structural considerations of seismic, electrical, fire, health, in accordance with the Rules of the Peruvian Structural Standards risks, and these are signed by a professional engineer qualified referee, enabling to CONTRANS for the storage of boxes, containers and cylinders with cyanide and. These records are available at CONTRANS and were reviewed during the audit.

The review of storage and transfer facility of CONTRANS is performed by a multidisciplinary group of professionals made up of 01 Structural Engineer, 01 Sanitary Engineer, 01, Electrical Engineer, Safety and 01 Health at Work Engineer and 01 Architect, which are qualified referees. This is a requirement of the Municipality of Callao, Peru to get the "License to Operate" It was evident that the last review concluding "Full Compliance" facilities CONTRANS for storage.

There are quality control and quality assurance documentation.

The warehouse built with concrete floor, walls and roof of iron corrugated has a chute end to end to prevent water ingress as secondary containment. It also has natural ventilation, which allows air circulation and prevents the rain from passing.

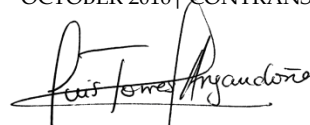
The failure of power outage does not affect the operation of CONTRANS nor cause a leak or spill. Warning system for reporting emergency brigade staff and hazardous materials to meet any spills promptly was evident.

The containers, boxes, cylinders of cyanide are stored on a pallet surface, which is on a concrete floor.

CONTRANS not develop activities filling tanks.



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CONTRANS not involve the use of pipes and tanks for storage of cyanide.

CONTRANS not employ the use of pipes for the storage solution cyanide.

1.2 PRODUCTION PRACTICE 1.2

DEVELOP AND IMPLEMENT PLANS AND PROCEDURES TO OPERATE CYANIDE PRODUCTION FACILITIES IN A MANNER THAT PREVENTS ACCIDENTAL RELEASES.

X in full compliance with

The operation is ☐ in substantial compliance with Production Practice 1.2
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.2 requiring an operation develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

The standard practices necessary for the safe and environmentally responsible operation are verified and documented as described in "PR-02-SST-04 Cargo Release Procedure - Hazardous Products and PR-02-SST-05 Sodium Cyanide Storage - Containers".

The staff of COTRANS is trained in those standards.

CONTRANS is aware of the dangers and risks involved in the use of sodium cyanide during storage, therefore, has developed an emergency plan for cyanide management Emergency Plan - Sodium Cyanide Management. The Plan allows them to ensure the safety and health of its employees, customers, contractors, visitors and others; and to fulfill the commitment to prevent or minimize the risk to health in an appropriate, timely and coordinate emergencies response.

Possible cases emergencies must:

- Cyanide Spill
- Warehouse Fire
- Cyanide Poisoning
- Natural Disasters (Earthquake, Tsunami)

COTRANS has a procedure in place and implemented to identify when site operating practices have or will be changed from those on which the initial design and operating practices were predicated.

CONTRANS implemented a program of preventive maintenance of equipment (Forklift and Stackers), maintenance and repair. Maintenance records of equipment used for loading / unloading and storage of cyanide were checked.

During the entry or exit from storage, the levels of hydrogen cyanide (HCN) are controlled with a calibrated instrument.

CONTRANS has TWO (02) monitoring equipment.

CONTRANS does not handle cyanide solutions.



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The Emergency Plan - Sodium Cyanide Management establishes procedures to dispose of cyanide in contaminated soil, which is describe below.

Decontamination

This activity is decontaminated personnel who had contact with NaCN. The DECON (decontamination corridor) is set in the warm zone and according to:

- Level of risk of contamination of personnel.
- Personal protective level assigned to the decontamination area.
- Grade and number of stations required for installation and riders decontamination personnel.

The basic equipment for decontamination corridors consisting of: plastic marked routes, mechanical cleaning utensils or pressure cleaner containers, thinners, waste recovery containers.

The contaminated clothing and equipment should be removed after use and stored in a controlled area (warm zone) until cleanup procedures can be initiated. In some cases, the protective clothing and equipment cannot be decontaminated and should be properly disposed of as hazardous waste.

The storage facility CONTRANS is build for ventilation naturally which allows entry of air entering avoiding rain.

The storage area CONTRANS has tin roof and brick walls, additionally has a system of gutters to catch rainwater and direct it to a sump. It also has a secondary containment system that consists of a trough which avoids water ingress and this is located opposite the entrance doors of the store.

CONTRANS makes a Risk Assessment Matrix of loading, unloading and storage.

Access to the Warehouse for CONTRANS is restricted, prohibited the public has a perimeter fence 6 feet tall and security based on two (02) security guards, also has a closed system of security cameras.

The store cyanide has locks on all doors and signals prohibited entry to unauthorized personnel.

The cyanide is packaged as required peruvian political jurisdiction.

1.3 PRODUCTION PRACTICE 1.3

INSPECT CYANIDE PRODUCTION FACILITIES TO ENSURE THEIR INTEGRITY AND PREVENT ACCIDENTAL RELEASES.

X in full compliance with

The operation is ☒ in substantial compliance with Production Practice 1.3
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 1.3 requiring an operation inspect cyanide production facilities to ensure their integrity and prevent accidental releases.

No tanks containing cyanide solutions in CONTRANS facilities. No piping, pumps or valves handle cyanide solutions on site. CONTRANS has load-lifting equipment (forklifts and stackers). The lifting and handling



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charges are inspecting daily and maintained in accordance with supplier has to do CONTRANS Maintenance Plan. These records were evidence during the audit.

In the check list be observed, name of inspector, date of inspection, to inspect items and recommendations on items that are found in the document. During the audit is observed along with inspection records evidence of correction the non-compliance.

WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

2.1 PRODUCTION PRACTICE 2.1

DEVELOP AND IMPLEMENT PROCEDURES TO PROTECT PLANT PERSONNEL FROM EXPOSURE TO CYANIDE.

X in full compliance with

The operation is ☐ in substantial compliance with Production Practice 2.1

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 2.1 requiring an operation develop and implement procedures to protect plant personnel from exposure to cyanide.

CONTRANS has developed the method of "PR-02-SST-04 Cargo Release Procedure - Hazardous Products and PR-02-SST-05 Sodium Cyanide Storage - Containers". This procedure includes the practices required for receipt, storage and dispatch of cyanide, indicating the needs of personal protective equipment and training requirements. Relevant staffs were interviewed during the audit and were well informed of the requirements of the procedures and practices, as do reportedly are in concordance with what is contained in the procedure.

Since installation is just a storage facility, emergency operations are only included in the Emergency Plan - Cyanide Management. In addition, maintenance is related only to forklifts and stackers, held outside the company premises by the supplier of the equipment.

The site has a Risk Assessment Matrix being responsible Head of Safety to review and update it whenever significant changes including the cyanide management practices are performed. Workers participate in relevant meetings and review of procedures safety and health issues at work company by the supplier of the equipment.

Workers participate in relevant meetings of review of issues of safety and health at work which takes at least once a month or whenever an emergency occurs. Topics related to health and safety at work are discussed, reviewed or creating procedures. Furthermore, induction talks were evident to all new personnel hired to work the stock cyanide in which the safe handling of the product, first aid in poisoning, spill management is explained.

It is noteworthy that after interviews with staff these declared to consult at any health and safety issue at work.

CONTRANS has two (02) detectors cyanide gas (HCN); detectors are calibrated for to alarm at 4.7 ppm. The detectors are calibrated and a calibration certificate is issued by the manufacturer. The calibration certificate is in force in the audit.

Reportedly, they have not identified areas or activities with concentrations of cyanide gas (HCN). Despite this, class A Personal Protective Equipment (encapsulated suit) is required in the installation and use of cyanide when a container is damaged and repairs made to it.

To the "buddy system" is set for establishing activities that cyanide must have minimum two persons and 1 extra person for supervision. Radios and telephones used to communicate between the relevant personnel related to the operations of cyanide.

Forklift and Stacker operators have radios with them at all times.

Pre-employment medical examinations are required before hiring new staff, periodically while working on CONTRANS, and out CONTRANS. Specific requirements are define for different trades and positions. Relevant documentation was review during the audit in connection with this.

Disposable Suits level C, are use as part of the Personal Protective Equipment required tasks in loading and unloading of cyanide.

There are warning signs posted on the cyanide storage area, advising is that cyanide is present and, if necessary, the appropriate personal protective equipment should be used. In addition, smoking is prohibited, dining, and open flames in areas where there is the possibility of contamination by cyanide.

2.2 PRODUCTION PRACTICE 2.2

DEVELOP AND IMPLEMENT PLANS AND PROCEDURES FOR RAPID AND EFFECTIVE RESPONSE TO CYANIDE EXPOSURE.

X in full compliance with

The operation is ☐ in substantial compliance with Production Practice 2.2

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 2.2 requiring an operation develop and implement plans and procedures for rapid and effective response to cyanide exposure.

CONTRANS has developed an emergency plan for quick and effective management of sodium cyanide Emergency Plan - Sodium Cyanide Management.

Response to cyanide exposure several detailed procedures are give, among which are:

- Cyanide Spill
- Warehouse Fire
- Cyanide Poisoning
- Natural Disasters (Earthquake and Tsunami)

This program includes drills two times per year of which was evidence that conducted in October 2016 during the visit.

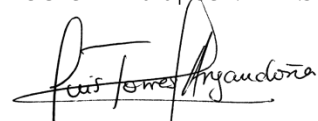
It is worth mentioning that after reviewing the training plan and training records was evident that the staff is training in the Emergency Plan and Safe Management of Cyanide (Spill and poisoning) were interviewed personnel involved in the operation, which claimed to have received training and drill, and have demonstrated knowledge in the application of the guidelines Emergency Plan.

The site has showers and portable wash stations eyes low pressure dry chemical extinguishers of 50 Kg, these last every 50 meters. According to eyewash stations, interviewed staff are inspect daily and extinguishers are inspect once a month.

CONTRANS features water distribution system, oxygen resuscitator.



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CONTRANS also deliver a copy of the MSDS and Emergency Plan evidencing the charge of receipt of the document.

Workers are provide with telephone for internal communication within the facility and has telephone services for external communication.

CONTRANS sets the "PR-02-SST-04 Cargo Release Procedure - Hazardous Products and PR-02-SST-05 Sodium Cyanide Storage - Containers" in the elements detailing first aid that must be present during operation with cyanide (receipt, storage and dispatch) provides a checklist to check the existence of these, if one was use be set to be replace immediately.

CONTRANS in the checklist provides a review of first aid kit this should be reviewed prior to performing any operation related to cyanide Checklists from January 2016 to April 2016 were reviewed; availability of equipment was confirmed during the audit.

The MSDS in Spanish was available next to the storage of cyanide. Also, the area has safety signage in Spanish language.

No tanks, pipes or containers. Cyanide is stored in warehouses, which are clearly marked with the following pictures:

Signals USE OF HELMETS, USE OF SAFETY MASK, USE OF SAFETY SHOES, and USE OF UNIFORM GLOVES.

- UN 1689
- Rombo IMO (class 6.1)
- NFPA Diamond
- MSDS
- No unauthorized personnel
- Prohibited Food and Drinking
- Prohibited use of water
- No Smoking
- Prohibited ingite

It only allows authorized to enter the work area with cyanide staff.

The Emergency Plan is stable guidelines for the care of people with cyanide poisoned by skin contact.

CONTRANS have medical services on site, additionally, CONTRANS informed the nearest health center (10 minutes by car) and the company of firefighters (10 minutes) on the application first aid in case of poisoning with cyanide and the application of Oxygen if required. They found in the Emergency Plan and are evidenced deliver a copy thereof to be send by the document.

The Emergency Plan includes a guideline for transporting workers exposed to the nearest medical facility (10 minutes).

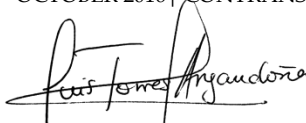
CONTRANS has established an emergency communication centers, alerting doctors about the risk of cyanide exposure. Letters been sent with the information necessary and maintain ongoing communication, letters are detailed email, direct phone and contact person.

Are mock emergency drills conducted periodically to test response procedures for various exposure scenarios, and are lessons learned from the drills incorporated into response planning?

CONTRANS does mock emergency drills periodically to test response procedures for various exposure scenarios:



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- First aid - 2016
- Cyanide Spill - 2016

CONTRANS has a emergency drills program annual for the 2016.

In the Simulation reports, CONTRANS describe opportunities for improvement and are considered for emergency response planning.

CONTRANS has implemented a couple to care and accident investigation methodology, which aims to ensure that all accidents and near misses are report and investigated immediately in order to make the respective corrections. This procedure is the responsibility of the Head of Safety. The procedure is divide into the accident / incident care, Accident Investigation / Treatment Failure and the accident / incident.

As part of this research, this method indicates that the investigation of the incident / accident must be support by a report.

CONTRANS reports no accidents occurred with cyanide or whatever is involved, information validated by interviews with company personnel operative.

MONITORING:

Ensure that process controls are protective of the environment.

3.1 PRODUCTION PRACTICE 3.1:

CONDUCT ENVIRONMENTAL MONITORING TO CONFIRM THAT PLANNED OR UNPLANNED RELEASES OF CYANIDE DO NOT RESULT IN ADVERSE IMPACTS.

X in full compliance with

The operation is ☐ in substantial compliance with Production Practice 3.1

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 3.1 requiring an operation conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

CONTRANS makes the finished product storage CONTRANS, cyanide is not remove from its package; operations do not generate air emissions or wastewater containing cyanide in normal conditions. The waste generated by an emergency would be handle as hazardous waste. This section does not apply to facilities.

CONTRANS makes no discharges to surface waters, stored CONTRANS presentation end briquettes packed in containers, boxes and cylinders product. The waste generated by an emergency would be handle as hazardous waste.

CONTRANS not perform any type of discharge, terminated CONTRANS stores briquettes packed in presentation containers, boxes and cylinders product. The waste generated by an emergency would be handle as hazardous waste.

CONTRANS not perform any type of indirect discharge to surface water, stored CONTRANS finished briquettes packed in presentation containers, boxes and cylinders product.

TRAINING:

Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner

4.1 PRODUCTION PRACTICE 4.1:

TRAIN EMPLOYEES TO OPERATE THE PLANT IN A MANNER THAT MINIMIZES THE POTENTIAL FOR CYANIDE EXPOSURES AND RELEASES.

X in full compliance with

The operation is ☐ in substantial compliance with Production Practice 4.1

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 4.1 requiring an operation train employees to operate the plant in a manner that minimizes the potential for cyanide exposures and releases.

CONTRANS provides training programs for workers, CONTRANS, the training program of 2016 was evident.

CONTRANS provides training programs for workers in annual form, the training program of 2016 on the entire course "Personal Protective Equipment" included was evident.

CONTRANS, evaluates the risks, in safety and health, to which its personnel is exposed annually. CONTRANS, develops an IPER matrix (matrix of hazard identification and risk assessment), implements operational controls (training, procedures, personal protective equipment, among others) to reduce the effects of them. These controls are permanently verified. These records were evidence during the audit.

CONTRANS performs risk assessment which is made by process and job after evaluation it was determined that the people involved with the management of cyanide should bring the following trainings:

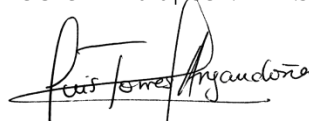
- First aid
- Fire Fighting
- Safe Handling of Cyanide (Spill and Intoxication)
- Use of PPE

CONTRANS names a person or entity responsible for each training session, all of which are CONTRANS qualified staff and external companies, was evidenced after reviewing the resumes of pre-employment with the same instructor. CONTRANS has a procedure for evaluating potential suppliers in terms of their suitability to work with CONTRANS.

CONTRANS sets and performs an initial induction to all staff and regular training on safety and health, in order to prevent accidents and spills this induction include: operating procedures, safe handling of cyanide (spill and intoxication), firefighting, first aid and use of personal protective equipment. These records were evidence during the audit. "Loading, Unloading and Storage of Sodium Cyanide Sodium" also states that the staff in the transaction related to cyanide must be previously entailed the performance of its duties. In addition, 5-minute briefings prior to commencing activities with sodium cyanide (loading and unloading) whose records were evidence during the audit are given.



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CONTRANS conducts annual drills to test the effectiveness of the training. Also, at the end of training assessment to workers.

During the visit, he met staff of CONTRANS demonstrating their knowledge in these courses.

4.2 PRODUCTION PRACTICE 4.2:

TRAIN EMPLOYEES TO RESPOND TO CYANIDE EXPOSURES AND RELEASES.

X in full compliance with

The operation is ☐ in substantial compliance with Production Practice 4.2
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 4.2 requiring an operation train employees to respond to cyanide exposures and releases.

CONTRANS has the Emergency Plan - Sodium Cyanide Management, in which all employees are training in the different scenarios that could result in a release cyanide as emergently. This is impart by the Chief Safety CONTRANS training once a year.

Training Program of CONTRANS Indicates that must perform TWO (02) exhaust drills of cyanide per year.

Simulations performed are evaluate in terms of effectiveness, to determine the level of knowledge, skills, and identifying weaknesses of staff and the organization. This assessment was evident in the reports of the drills conducted in 2016.

Training records were review to confirm the execution of the training program described above. These records include the names and signatures of the worker as worker and trainer, date of training and the topics covered. Three Employees were interview and responded correctly to all questions regarding cyanide management in your work area.

EMERGENCY RESPONSE:

Protect communities and the environment through the development of emergency response strategies and capabilities.

5.1 PRODUCTION PRACTICE 5.1:

PREPARE DETAILED EMERGENCY RESPONSE PLANS FOR POTENTIAL CYANIDE RELEASES.

X in full compliance with

The operation is ☐ in substantial compliance with Production Practice 5.1

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 5.1 requiring an operation prepare detailed emergency response plans for potential cyanide releases.

CONTRANS developed the Emergency Plan - Sodium Cyanide Management (hereinafter referred to as the Plan). The Plan is a document that covers all operations during the operations in the warehouse. A section that describes the characteristics of sodium cyanide, emergency organization, communication protocol, and emergency evaluation levels are included.

The scenarios are relate to releases of containers, wooden boxes and iron cylinders, and action plan includes specific response to these scenarios.

The Plan does not include instructions to evacuate communities. The possible scenarios have no consequences beyond the limits of the CONTRANS facilities. Furthermore, only handles CONTRANS sodium cyanide solid state (briquettes).

The Plan comprises a method for the treatment of poisoning of people spilled cyanide reaction portion includes instructions for the use of cyanide antidotes and first aid procedures. The medical staff of the health center is familiar with these procedures.

In The Plan actions in the case a spill occurs has specified actions to control of releases at their source.

CONTRANS Plan will be review after an emergency. This would help prevent future releases.

5.2 PRODUCTION PRACTICE 5.2:

INVOLVE SITE PERSONNEL AND STAKEHOLDERS IN THE PLANNING PROCESS.

X in full compliance with

The operation is ☐ in substantial compliance with Production Practice 5.2

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:



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The operation is in FULL COMPLIANCE with Standard of Practice 5.2 requiring an operation involve site personnel and stakeholders in the planning process.

The Chief Safety CONTRANS developed the plan. The nearest residential area is located more than 1 km of the facility. According to the emergency response procedure at worst an area of 500 m should be evacuated; not covering the residential area.

However, CONTRANS government informed the district about its operations and that require their support CONTRANS evacuate in an emergency.

CONTRANS has contacted the local police, local firefighters, and local hospital, and informed them that are considered as supporting facilities for emergency cyanide.

The Plan includes a communications protocol in writing stating the emergency communication should be with all Stakeholders, including; Employees, Customers, Regulatory Agencies and other institutions.

5.3 PRODUCTION PRACTICE 5.3

DESIGNATE APPROPRIATE PERSONNEL AND COMMIT NECESSARY EQUIPMENT AND RESOURCES FOR EMERGENCY RESPONSE.

X in full compliance with

The operation is ☐ in substantial compliance with Production Practice 5.3

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 5.3 requiring an operation designate appropriate personnel and commit necessary equipment and resources for emergency response.

The Plan includes the name of the individual members of those responsible for coordinating detailed emergency and their roles and responsibilities. The General Manager CONTRANS grants the authority to provide all necessary resources. The Plan in the contact number of the people involved in emergency response is shown.

The Plan identifies the emergency response teams that are the prominent cyanide operation staff.

All operational staff are training in cyanide emergency response:

- Cyanide Spills.
- First Aid.

The Plan shows the contact information of all the Coordinators and Response Team Members (Committee of Crisis). This plan states that these members have been given phones must respond at all times (24 hours).

The responsibilities of the Emergency Response Team describe the Plan.

On the list, Plan of emergency response teams detailing has to be used and which were evidenced after field inspection CONTRANS are there for an emergency response.

Also specified in the Plan which is very important during storage operations have a set of equipment and materials that will allow them immediate emergency response.

The Kit of emergency response should be check before each operation with sodium cyanide (download / Storage space / load) and identified the absence of a team it must be replaced prior to the start of activities.

The Plan describes the activities of external support centers also in emergency appointment with the address and telephone numbers for quick contact in case of medical care can quickly evacuate those involved.

CONTRANS, in the spill and intoxication drill report, evidenced there involvement the outside entities (Firefighters).

5.4 PRODUCTION PRACTICE 5.4

DEVELOP PROCEDURES FOR INTERNAL AND EXTERNAL EMERGENCY NOTIFICATION AND REPORTING.

X in full compliance with

The operation is ☐ in substantial compliance with Production Practice 5.4
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 5.4 requiring an operation develop procedures for internal and external emergency notification and reporting.

The plan includes a communication protocol that includes internal communication functions, as well as notification to the authorities and external response personnel.

The Plan includes a directory of internal and external contacts. It also displays the contact information of the entire team of internal and external response to emergencies; members of that team have telephones and are available 24 hours a day that was check after calls to these numbers during the visit. Plan evacuation of communities deemed necessary. Click for communication with Authorities and External Response Personnel.

The warehouse is far more than 1 km radius communities. Communication with authorities and external emergency responders was evident, which are included in the emergency response plan and those who are informed in the event of an incident.

5.5 PRODUCTION PRACTICE 5.5

INCORPORATE INTO RESPONSE PLANS AND REMEDIATION MEASURES MONITORING ELEMENTS THAT ACCOUNT FOR THE ADDITIONAL HAZARDS OF USING CYANIDE TREATMENT CHEMICALS.

X in full compliance with

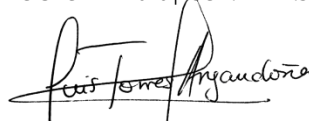
The operation is ☐ in substantial compliance with Production Practice 5.5
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 5.5 requiring an operation incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.



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Lead Auditor Signature

The plan describes the methodology to decontaminate, remediate soil or other contaminated materials and dispose of all spill cleanup debris and bodies of water test for the presence of cyanide. In the Plan prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

Based on the Risk Assessment Matrix, there is no potential to affect water bodies. None of specific scenarios rather think that a spill would reach the floor or water. The monitoring is limited to the air and is carried out with detector gas cyanide (HCN) portable.

5.6 PRODUCTION PRACTICE 5.6

PERIODICALLY EVALUATE RESPONSE PROCEDURES AND CAPABILITIES AND REVISE THEM AS NEEDED.

X in full compliance with

The operation is ☐ in substantial compliance with Production Practice 5.6
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 5.6 requiring an operation periodically evaluate response procedures and capabilities and revise them as needed.

In the plan provides that the Chief Safety - CONTRANS should review the Plan after each mock emergency after emergency. According to the pages of signatures, the plan was under review at the time of the audit. The site has an Annual Program of Emergency Drills including cyanide spill.



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