



**DuPont Sodium Cyanide Production & Packaging  
Operations**

**ICMI Cyanide Code Re-Certification Audit**

**SUMMARY AUDIT REPORT**

**Audit Dates:** October 9-10, 2012 – Carlin Terminal  
September 18-21, 2012 – DuPont Memphis Plant and LSI  
Terminal

**Submitted to:**  
**The International Cyanide Management Institute**  
**1400 I Street, NW – Suite 550**  
**Washington, DC 20005**  
**USA**



**[www.cnauditing.com](http://www.cnauditing.com)**

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# SUMMARY AUDIT REPORT

**Name of Cyanide****Production /****Packaging /****Transload****Operations:****DuPont Sodium Cyanide Operations consisting of:**

- (1) Memphis Plant (Memphis, TN)
- (2) LSI Terminal (Memphis, TN)
- (3) DuPont Carlin Terminal (Carlin, NV)

**Names of Facility****Owners:**

- (1) E.I. duPont de Nemours and Company, Inc (Memphis Plant)
- (2) Lemm Services Inc. (LSI Terminal)
- (3) E.I. duPont de Nemours and Company, Inc (Carlin Terminal)

**Names of Facility****Operators:**

- (1) E.I. duPont de Nemours and Company, Inc (Memphis Plant)
- (2) Lemm Corporation (LSI Packaging Terminal)
- (3) Lemm Corporation (Carlin Transload Terminal)

**Names and Addresses of Responsible Managers:****(1) DuPont Memphis Plant**

Philip D. Sigler, Plant  
 Manager  
 DuPont Memphis  
 Plant  
 2571 Fite Road  
 Memphis, TN 38127  
 USA  
 Tel. 901-353-7201  
 Fax. 901-353-7397

**(2) LSI Packaging Terminal**

Ed Jodzio, Plant Manager  
  
 Lemm Corporation  
 5200 Old Millington  
 Memphis, TN 38127 USA  
 Tel. 901-353-5056  
 Fax. 901-353-4855

**(3) DuPont Carlin Transload Terminal**

Marley Robinson, Manager  
  
 Lemm Corporation  
 3 miles east of Carlin on old  
 Highway 40  
 Carlin, NV 89822 USA  
 Tel. 800-798-6333  
 Fax. 775-754-6053

DuPont Sodium Cyanide Operation  
 Name of Facility

*Marie K. Dunkle*  
 Lead Auditor: Marie Dunkle

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### Company Background Information:

E.I. duPont de Nemours and Company, Inc. (DuPont) is a science-based company operating in more than 70 countries. DuPont offers a wide range of products and services for markets including agriculture, nutrition, electronics, communications, safety and protection, home and construction, transportation and apparel. Solid sodium cyanide for use in the gold mining sector is manufactured at the Memphis, Tennessee plant, which is part of the DuPont Chemicals & Fluoroproducts Business. The plant is located just outside of Memphis in Woodstock, Tennessee.

DuPont was one of the original 14 Cyanide Code signatory companies announced on November 3, 2005. As such, DuPont made the commitment to obtain Cyanide Code certification for its Memphis Solid Cyanide Plant and its packaging operations. DuPont was the first Cyanide Producer to achieve certification in June 2006. The operation was re-certified in 2009.

This re-certification audit of DuPont and its cyanide packaging operations was conducted according to the ICMI certification auditing process that calls for each signatory organization to undergo a third-party re-certification audit every three years.

### Description of the Operations:

The DuPont sodium cyanide production operation is just one of several operations at this DuPont-owned plant site. DuPont has been producing sodium cyanide at this location since 1953. The solid sodium cyanide briquettes are packaged at the Memphis Plant, at the LSI Terminal directly adjacent to the plant and at the DuPont packaging terminal in Carlin, Nevada, USA. The Memphis Plant ships sodium cyanide in bulk and semi-bulk packages.

The LSI Terminal re-packs the sodium cyanide briquettes from rail hopper cars into semi-bulk (bag-in-box intermediate bulk containers). The LSI Terminal has been in operation since 1994. The LSI Terminal is owned by Lemm Services, Inc. and is operated by the Lemm Corporation.

The DuPont Carlin Terminal re-packs the cyanide briquettes from rail hopper cars into semi-bulk and bulk packages. The Carlin Terminal also dissolves sodium cyanide in alkaline water to make a nominal 30% sodium cyanide solution. Carlin has been in operation since 1982. The Carlin Terminal is owned by DuPont and is operated by the Lemm Corporation.

Cyanide handling and management practices at the three locations were evaluated against the Cyanide Code requirements, the organizations' procedures and supporting documents. The audit was conducted through discussions and interviews with management, production, and packaging personnel at each of the three operations. Additionally, records were reviewed and observations of current practices were made. The auditor used the January 2011 revision of the ICMI "Cyanide Production Verification Protocol" to confirm that the operations have continued to remain in compliance with Cyanide Code requirements since the initial certification in 2006. All three operations were found to be in FULL COMPLIANCE with the Cyanide Code as a result of this audit.

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### *Auditor's Finding*

This operation is

in full compliance

with the International Cyanide Management Code.

These operations have not experienced any cyanide incidents or compliance problems during the previous three-year audit cycle.

Audit Company:	CN Auditing Group, Inc. <a href="http://www.cnauditing.com">www.cnauditing.com</a>
Audit Team Leader:	Marie Dunkle E-mail: <a href="mailto:mdunkle@cnauditing.com">mdunkle@cnauditing.com</a>
Date(s) of Audit:	October 9-10, 2012 – Carlin September 18-21, 2012 – DuPont Memphis Plant and LSI Terminal

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 Production Operations and using standard and accepted practices for health, safety and environmental audits.

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Signature of Lead Auditor

DuPont Sodium Cyanide Operation  
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**1. OPERATIONS:** *Design, construct and operate cyanide production facilities to prevent release of cyanide.*

Production Practice 1.1: *Design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.*

**The operation is**  **in full compliance with Production Practice 1.1**

*Summarize the basis for this Finding:*

All three facilities were built using sound, accepted engineering practices and quality control processes. Process hazard analysis methods and procedures were used to design and build all three facilities. DuPont QC & QA records audited during the initial certification audit were found at that time to be complete and readily retrievable. DuPont uses a formal management of change (MOC) process to manage all changes to the facility. MOC records, and where required PHA records, from facility changes since the 2009 recertification audit were reviewed and were found to be complete. Additionally records reviewed during the re-certification audit showed that qualified American Petroleum Institute (API) inspectors continue to perform inspections and tests of the equipment. Technical specifications for acceptable materials of construction are formally defined and a review of records confirmed that materials conformed to internal requirements.

Numerous changes to DuPont Memphis facility since the 2009 recertification audit were reviewed.

Changes to the LSI facility included: new box line filling station and roller conveyor, major repair to wastewater storage tank 102, major roof repair, and installation of the "Adjustaveyor" for drum movement. Records were available to show that the equipment had been inspected and was approved for use by a professional engineer and that an API certified inspector provided inspection of work done regarding storage tank repair. An American Petroleum Institute (API) inspector performed inspections and tests of the equipment as required.

Changes to the Carlin facility included: installation of sump liner for 30% solution tank area and temporary use of the ISO tanker for mixing cyanide solution. A defined change management processes was used and equipment was inspected and approved for use by a professional engineer.

All facilities are built on concrete and they have appropriate containment systems that ensure full containment. Interlock systems and high-level alarms are integral parts of the design and construction of each of the facilities. All facilities use management system procedures and forms to inspect their interlocks, process equipment, piping, and containment systems regularly to ensure functionality and integrity.

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Production Practice 1.2: *Develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.*

**The operation is**  **in full compliance with Production Practice 1.2**

*Summarize the basis for this Finding:*

All three operations have detailed procedures, work instructions and checklists that enable them to operate in a safe and environmentally responsible manner. Additionally, robust training programs at the three operations include competency evaluations to ensure that personnel are competent to operate the production and packaging equipment. Operational procedures also detail what steps must be taken in case of an upset condition or emergency.

Appropriate reviews and evaluations are conducted any time changes are made to operations or facilities. The DuPont production operation follows a formal management of change (MOC) process that includes the review and approval of changes from multiple professional experts prior to implementing a change. The same MOC process is applied to any changes made at the DuPont Carlin terminal. Any changes made to the facility or operations at the LSI Terminal are made after review and approval made by a professional engineer in accordance with the LEMM Loss Control Manual procedure. Records reviewed led the auditor to conclude that appropriate management of change methodologies are currently being used by all three operations.

Each facility has a formal preventive maintenance program in place to ensure that process equipment is properly maintained and that instruments are calibrated. Safety systems designed to protect worker health and the environment such as interlocks, air monitors, and personal cyanide monitors are included in the preventive maintenance programs. Maintenance and calibration records for critical process and safety equipment and instruments were evaluated against internal requirements. Records were found to be complete and where applicable, internal procedures were consistent with manufacturers' recommendations. Additionally, maintenance personnel were interviewed at each facility and were found to be very knowledgeable and competent.

No cyanide-containing water discharges to the environment occur from any of the facilities. The only facility that is near a water body (Loosahatchie River) is the DuPont cyanide production operation. Any water that potentially can come in contact with or derive from the cyanide production area is treated on-site and discharged as a permitted discharge to the local water authority.

Ventilation at the three facilities was sufficient to protect against the build-up of HCN gas. The cyanide is kept under roof and dry at all times. Security was found to be acceptable at each of the locations. Access to areas with cyanide is strictly controlled and state-of-the-art security equipment and systems are being used by all three locations.

DuPont controls the labeling and packing specifications for all products shipped from all three locations. Processes exist within the DuPont Corporation to ensure that packaging and labeling are appropriate for the jurisdictions through which the load will pass. The languages printed on the containers, for example, appear in English, the language of the destination country, and also in 6 standard European languages.

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Production Practice 1.3: *Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.*

**The operation is**  **in full compliance with Production Practice 1.3**

*Summarize the basis for this Finding:*

All three sites have inspection programs to ensure the integrity of process equipment and prevent accidental releases of cyanide. A review of records and results of interviews confirmed that tanks, valves, pipelines, and containments are routinely inspected for their integrity, closure of drains, presence of fluids, and deterioration. Field operators, terminal managers, and operators were interviewed and the inspection sheets from field rounds and trench / drain inspections were presented as evidence. Frequencies of inspections were found to be appropriate for the operations. Inspection records indicate the date of inspection, the name of the inspector, and any observed deficiencies. Additionally, API inspections are performed to check for deterioration of process equipment / piping in contact with cyanide solution.

Operators, maintenance personnel and inspectors at all sites showed a high level of awareness regarding the importance of performing thorough inspections. Records from all sites indicated that corrective actions are taken in a timely manner in response to deficiencies noted during preventive maintenance and/or daily inspection rounds.

**2. WORKER SAFETY:** *Protect workers' health and safety from exposure to cyanide.*

Production Practice 2.1: *Develop and implement procedures to protect plant personnel from exposure to cyanide.*

**The operation is**  **in full compliance with Production Practice 2.1**

*Summarize the basis for this Finding:*

Worker exposure to cyanide is minimized through the use of personal protective equipment (PPE) and through the safe operation of equipment. The minimum PPE requirements are defined in formal procedures at each location. PPE requirements are defined for all types of operations from receipt of material through packaging and shipping. Non-routine and emergency operations at all three sites are performed by trained personnel wearing protective gear that is inspected regularly. Emergency procedures are defined in the site emergency response plans (ERPs).

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All three sites have mature detailed procedures in use for normal and abnormal operations. The buddy system is implemented throughout each facility and PPE requirements are identified for each type of job. Increased PPE requirements are defined for non-routine operations. Personal conduct and safety rules are similar at each site and employees stated and demonstrated respect and adherence to the rules. Work permits and/or standard procedures are used by each of the operations for maintenance activities to ensure that work practices and PPE are appropriate and safe. A formal management of change (MOC) system is used for proposed process and operational changes at the DuPont facility. Action items are tracked in a database. Changes that may impact worker safety are reviewed by appropriate personnel to ensure conduct of a thorough safety review. Pre-start up safety reviews (PSSRs) are used prior to putting new equipment on-line. Operators and engineers are involved in the MOC process and in the PSSRs. Samples of action items and MOC reviews were evaluated. All records were complete. Changes to terminals processes or operations are reviewed for safety by site managers who consult with DuPont industrial hygiene and medical professionals, as necessary and appropriate.

Operators and Shift Supervisors / Terminal Managers are involved in PPE determinations. Safety Meetings are also used to gain participation. Records and interviews confirmed that employees are involved in evaluating safety procedures. Fixed point cyanide detectors and personal cyanide detectors are used by the DuPont production operation to monitor cyanide concentrations to ensure that they are below 4.7 ppm. Procedures require that field operators have personal monitors and production and warehouse area visitors have at least one person in each group who has a monitor with them. At the Carlin terminal, stationary cyanide detectors and personal cyanide detectors are used to monitor cyanide concentrations to ensure that they are below 4.7 ppm. The LSI terminal uses personnel cyanide detectors to ensure that concentrations are below 4.7 ppm. All cyanide detection equipment is calibrated according to manufactures' recommendations. This was confirmed through a review of procedures, owner's manuals, and calibration records.

DuPont production operations where cyanide exposure may be elevated have been identified. Anywhere in the plant or warehouse is assumed to have the potential for elevated concentrations of cyanide. PPE is therefore required for all areas, and additional PPE is required for non-routine activities or for jobs in which there is a splash hazard. Procedures (e.g., for line breaks) were reviewed and this was confirmed. At the terminals, operations where cyanide exposure may be elevated have also been identified. IH studies were reviewed for each site. PPE is required for all warehouse and packaging work areas, and additional PPE is required for wet or dusty tasks.

Practices designed to protect workers at all three locations include the use of the buddy system, regular health assessments, and formally defined change of clothing policies. Eating, drinking, and smoking restrictions exist at all sites. Open flames are prohibited in areas that have flammable materials (such as HCN) and in electrically classified areas. Areas with cyanide have strict access control and posted PPE requirements. Strict adherence to worker safety practices is monitored by management. Employees at each location were interviewed and showed very good awareness and understanding of these practices.

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Production Practice 2.2: *Develop and implement plans and procedures for rapid and effective response to cyanide exposure.*

The operation is  in full compliance with Production Practice 2.2

*Summarize the basis for this Finding:*

All three locations have detailed emergency plans and procedures available for use during a cyanide exposure incident. Personnel are trained in these procedures and demonstrate proficiency during drills and training. Commercially supplied combination shower / low-pressure eye wash stations and non-acidic fire extinguishers are located strategically at each site. Each location also has a program for inspecting the equipment regularly. All three locations have water, oxygen, resuscitators, antidote, and a means of communication readily available. Each site manages its amyl nitrite medicines appropriately to ensure that they do not go out of date. All three locations appropriately maintain their equipment and their medicines to ensure their availability during an emergency. Recent records of equipment inspections were reviewed at all sites. All three locations have an English-speaking workforce. MSDSs were available at each site. Operator awareness of how to access MSDS was confirmed and several MSDSs were sampled at each location. Piping at all three locations was appropriately identified and showed the direction of flow.

Each facility has a decontamination area for personnel and a policy. Medical professionals are on-site at the DuPont production operation. The terminals have personnel who have been trained in first aid, CPR, and in responding to cyanide exposure emergencies. In case of a cyanide exposure event requiring the transport of a person to a hospital, the procedures for all sites are to decontaminate the workers, call 911 and wait for ambulance transport. Procedures also define the need to send a Cyanide Antidote kit with the ambulance. Interviews confirmed that the Cyanide Antidote kit is sent with the ambulance driver in cases of cyanide exposure. Hospitals near each of the facilities have been contacted and cyanide safety training is provided by DuPont Product Stewardship personnel on a recurring basis. Each site conducts mock emergency drills, holds drill critique, and evaluates the need for further training or adjustment to the emergency procedures. Records were reviewed and the auditor confirmed that all sites are holding drills at least once per year and often several times per year. Evaluations were available and were reviewed. Each site has procedures for investigating emergency incidents after the event. A sampling of incident reports from each site since the 2009 recertification was reviewed and confirmed reporting, investigation and emergency response critique and documentation of lessons learned.

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### 3. MONITORING: *Ensure that process controls are protective of the environment.*

Production Practice 3.1: *Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.*

The operation is  in full compliance with Production Practice 3.1

*Summarize the basis for this Finding:*

Groundwater monitoring is done at the DuPont production operation and the DuPont Carlin terminal. WAD cyanide levels in groundwater were found to be below detection levels at the DuPont production operation and were below action levels at the Carlin terminal. Upgrades have been made at the DuPont Memphis production facility in cyanide monitoring for the Trench to Trade Waste and pH monitoring has been installed in the Trench to Trade Waste since 2009. These are significant improvements supporting monitoring to ensure environmental protection. Continuous analyzers are equipped with alarms and interlocks. Annual sampling is done of groundwater to confirm that groundwater is not impacted. Records review confirmed this.

Carlin monitors groundwater concentrations annually and records submitted to the State of Nevada and reviewed show concentrations to be below detection and action levels.

The LSI terminal was built on a lined engineered surface, has no cyanide solution product, and has had no spill events. No groundwater sampling is therefore done at this terminal.

Air monitoring data for the DuPont production operation reviewed during the audit confirmed that HCN air emissions are well within permitted levels. The air emissions for the terminals are calculated levels based on throughput of the facilities. A review of records for 2010-2012 indicated that both terminals have operated well under permitted air emissions levels. The frequencies of monitoring and calculations were found to be appropriate for each of the sites.

Air emissions at the LSI and Carlin facilities are permitted based on calculations of throughput for both facilities. A review of monthly calculations and a 12-month rolling average for 2009, 2010, and 2011 were reviewed and found to be acceptable. The regulatory body that has jurisdiction over the LSI site and that issued the permit, the Memphis & Shelby County Health Department conducted a compliance inspection of the site in June 2012 with the report showing full compliance. Air emission data for 2010 and 2011 annual submittals were also reviewed; air emissions were within permitted levels.

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**4. TRAINING:** *Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.*

Production Practice 4.1: *Train employees to operate the plant in a manner that minimizes the potential for cyanide exposures and releases.*

**The operation is**  **in full compliance with Production Practice 4.1**

*Summarize the basis for this Finding:*

Training records were available at all three locations. Although training methods varied slightly, a sample of training materials and plans confirmed that training needs were identified for all employee positions and tasks. A sampling of records at each site confirmed that employees were appropriately trained on operational, safety, and PPE requirements prior to working with cyanide. The correct use of PPE is one of the many topics included in the training programs as well as specifically addressed in operating procedures that are the basis for much training. Training effectiveness was judged at each site via testing and skill demonstrations. Appropriate records are maintained of these and were reviewed during the audit. New employees at LSI and Carlin were interviewed regarding tasks conducted, training received and understanding of personal protection and cyanide safety precautions. Interviews supported confirmation that employees were trained to operate in a manner that minimizes potential for cyanide exposures and releases.

Production Practice 4.2: *Train employees to respond to cyanide exposures and releases.*

**The operation is**  **in full compliance with Production Practice 4.2**

*Summarize the basis for this Finding:*

Employees at all sites are trained on emergency response procedures, including the response to a cyanide leak or exposure. Refresher training is given periodically. Records from 2010 through 2012 were sufficiently detailed to demonstrate conformance. Interviews confirmed that employees, including new employees, understand and are aware of the emergency response procedures. Additionally, employees at each site participate in regular emergency drills including “man down” drills which simulate a cyanide exposure event. Drill critiques are conducted after each drill to determine if additional training or ERP revision is required. Detailed training records are retained by each site. Records are maintained for at least as long as the employee is working at the site. A sampling of training records from 2010 through 2012 showed that training record retention requirements are being fulfilled. Records pertaining to cyanide safety and emergency response training were sufficiently detailed to be found conformant.

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

Production Practice 5.1: *Prepare detailed emergency response plans for potential cyanide releases.*

**The operation is**  **in full compliance with Production Practice 5.1**

*Summarize the basis for this Finding:*

The Emergency Response Plans from each site were reviewed. They were found to be appropriately detailed. Different types of emergencies are addressed by the plans and the steps to be taken for on-site and off-site notifications are clear. The roles and responsibilities of the response personnel are well defined. Specific details are included in the ERPs and supplemented by facility-specific Emergency Recognition and Prevention procedures, Operating procedures for Upset Conditions, and the Malfunction Plan for Environmental Emergencies. These address the necessary steps to be taken in order to mitigate environmental impact and protect worker safety.

Production Practice 5.2: *Involve site personnel and stakeholders in the planning process.*

**The operation is**  **in full compliance with Production Practice 5.2**

*Summarize the basis for this Finding:*

Site operations, safety, environmental, maintenance and medical personnel at each location are involved in the emergency planning process. DuPont Memphis manages the interface with local response agencies for itself and LSI. The local fire department and EMTs are invited and are usually involved in drills each year (most recent involvement of external responders was August and September 2012). DuPont maintains contact with the Memphis Hazmat Team and participated in the Memphis / Shelby County Emergency Response drill in 2012. Extensive efforts have been made to outreach to the community including working with the LEPC to provide shelter-in-place training. DuPont meets with local emergency planning and response organizations regularly and has updated them on changes to facilities. DuPont has also performed outreach activities for medical facilities and outside fire and hazmat responders in the Carlin, NV area as part of its product stewardship program. Additionally, the Carlin terminal has involved external government and industry responders in emergency response drills and an emergency exercise in November 2011 to ensure that they are prepared for responding to a potential emergency.

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Production Practice 5.3: *Designate appropriate personnel and commit necessary equipment and resources for emergency response.*

**The operation is**  **in full compliance with Production Practice 5.3**

*Summarize the basis for this Finding:*

Each site maintains documentation that clearly designates full responsibility and authority for managing emergency situations. ERPs also designate alternate coordinators. The emergency responders are identified at each site. They receive appropriate training, respirator fit tests, and participate in regular meetings and/or drills. Records of training were sampled and were found to be acceptable. The DuPont emergency plan is very detailed regarding the titles, responsibilities, and call-out procedures to be used during an emergency. The facility ERP lists the emergency equipment that needs to be on-site and the equipment is inspected regularly. The ERPs for the terminals were found to be appropriately detailed for the complexity of the operations. Each ERP has identified the emergency equipment necessary and has a checklist for inspecting the equipment.

The emergency response plans for each site clearly designate roles & responsibilities, call-out procedures, and list current phone numbers. Appropriate emergency response equipment was available at each site. Equipment located at appropriate places on-site was observed during the audit and inspection records were sampled. Each site participated in multiple drills involving outside responders since the 2009 re-certification audit. Records reviewed showed drill scenarios to be realistic, with performance critiques conducted and actions for improvement tracked to closure.

Production Practice 5.4: *Develop procedures for internal and external emergency notification and reporting.*

**The operation is**  **in full compliance with Production Practice 5.4**

*Summarize the basis for this Finding:*

Each site's ERP had a detailed list of internal and external stakeholders that need to be notified depending on the nature of the emergency. Contact information is reviewed regularly and maintained to be current. Procedures are in place to ensure that timely communications and notifications are made to appropriate and required community, regulatory, medical and offsite response entities in the event of an emergency. LSI and Carlin facilities have provisions and training to provide immediate notification to DuPont management in the event of an emergency.

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*Production Practice 5.5: Incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.*

**The operation is  in full compliance with Production Practice 5.5**

*Summarize the basis for this Finding:*

Specific details regarding the remediation, neutralization, decontamination, and disposal of clean-up debris are contained within the Emergency Response Procedures. Extensive descriptions of necessary action steps depending on the incident scenario are clearly outlined in the document. These procedures are used to either perform remediation efforts or manage remediation efforts by third-parties for any spills at facilities within the scope of this audit.

DuPont emergency response plans prohibit the use of treatment chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide if cyanide spills into surface waters. General knowledge at the DuPont site and the waste water treatment procedures in operating manuals were found to be sufficient to ensure that dangerous chemicals would not be added to the surface water.

*Production Practice 5.6: Periodically evaluate response procedures and capabilities and revise them as needed.*

**The operation is  in full compliance with Production Practice 5.6**

*Summarize the basis for this Finding:*

Each site reviews the adequacy of its ERP regularly and conducts drills each year. Drill critiques are conducted with those who were involved. Action items for revisions to the plan are identified, as necessary, and tracked to closure. Records of incident reports and observation confirmed that response is also evaluated following actual emergencies and action items for improvement are tracked to closure.

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