



**ICMI Cyanide Code Cyanide Production  
Summary Audit Report**

**DuPont San Luis Potosi, Mexico  
Cyanide Packaging Terminal  
Certification Audit**

**Submitted to:  
International Cyanide Management Institute  
888 16th Street, NW – Suite 303  
Washington, DC 20006  
USA**

*2010 Audit Cycle*



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## San Luis Potosi Summary

### *Company Name & Contact Information*

DuPont – Mexico	Homero 206 Col. Chapultepec Morales Delegación Miguel Hidalgo México, D.F. CP 11570 Tel. (55) 5722-1000 Eje 120 #500
S.I.P.	Zona Industrial del Potosí San Luis Potosí, San Luis Potosí CP 78090 Tel. (444) 824-52-65 & (444) 824-52-63

### *Operational and Audit Information*

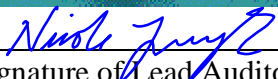
E.I. duPont de Nemours and Company, Inc. (DuPont) is a science-based company operating in more than 70 countries. DuPont offers a wide range of products and services for markets including agriculture, nutrition, electronics, communications, safety and protection, home and construction, transportation 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 Cyanides Business and Chemicals & Fluoroproducts Strategic Business Unit. The plant is located just outside of Memphis in Woodstock, Tennessee. Bulk and semi-bulk shipments of sodium cyanide are shipped to the San Luis Potosi packaging terminal where the cyanide is repackaged into Flo-Bins® and ISO containers mounted on truck chassis.

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 and the operation was re-certified in 2009. The DuPont San Luis Potosi location has been in operation as a warehouse terminal since 2006. It was audited to the Cyanide Code as part of the DuPont Mexico Supply Chain audit in 2007. Operations in San Luis Potosi expanded between 2008 and 2010 to include first the packaging of cyanide into ISO tanks and then the packaging of cyanide into Flo-Bins®. This audit was conducted in April 2010 using the Cyanide Code Production Protocol. The San Luis Potosi warehouse operation was also audited to the Interim Storage requirements of the Transportation Protocol in March 2010 as part of the 2010 certification audit of the Mexico Supply Chain.

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### *Description of the San Luis Potosi Operation:*

The DuPont Mexico operations are headquartered in the Homero Building in Mexico City, Mexico. The DuPont San Luis Potosi terminal is operated by Suministros Industriales Potosinos, S.A. De C.V. (S.I.P.). DuPont manages operations directly with an Operations Leader who is a DuPont employee. Bulk cyanide arriving into the San Luis Potosi facility in hopper cars or FLO-BIN@s is transloaded and/or packaged into FLO-BIN@s or ISO tanks.

The San Luis Potosi warehouse receives rail shipments of sodium cyanide via the KCSM railroad. The cyanide arrives in intermodal containers, box cars, and hopper cars. Rail spurs lead to the warehouse building and unloading occurs within a fenced and secure area. Truck shipments are brought in by ALR in cargo trailers. The unloading of trucks occurs at the loading dock which is also within the secure area. The cyanide is stored in covered well-ventilated warehouses prior to being dispatched to customers by truck.

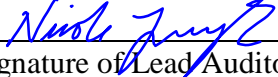
The transloading and packaging operations are the subject of this report. A separate audit of the facility was conducted in March 2010 using the Cyanide Code Transportation Protocol. The results of that audit are contained in a separate report.

### *San Luis Potosi Packaging Operations - Auditor's finding and attestation*

The audit was performed at the DuPont San Luis Potosi terminal which is operated by Suministros Industriales Potosinos, S.A. De C.V. (S.I.P.). Personnel from DuPont Mexico HQ, S.I.P., and San Luis Potosi Packaging Terminal were audited during this assessment. The audit was performed by an independent third-party auditor who was pre-approved by the ICMI. The certification audit was conducted on-site on April 14-15, 2010.

The DuPont cyanide production/packaging practices using were evaluated against the Cyanide Code requirements documented in the *ICMI Cyanide Code* (2009) and the *ICMI Cyanide Code Production Protocol* (2009). DuPont internal Standards, Policies, Practices, and Procedures regarding the management of the operations were reviewed. The audit was conducted through discussions and interviews with multiple individuals in cross-functional roles at DuPont and S.I.P (see table below). Records were randomly sampled for all Cyanide Code requirements and were found to be acceptable.

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Production Practice Discussed →	Organization	1.1 QA / QC – Design of Facility	1.2 Safe Operations to Avoid Accidents	1.3 Inspect Facilities and Equipment	2.1 Safety Procedures – Protect Against Exposure	2.2 Plans and Procedures for Response to Exposure	3.1 Environmental Monitoring	4.1 Train Employees in Safe Operations	4.2 Train Employees to Respond to Emergencies	5.1 Emergency Response Plan	5.2 Involve Stakeholders	5.3 Emergency Response Resources	5.4 Notification Procedures	5.5 Remediation & Cyanide in Water Hazards	5.6 Emergency Response Drills
<b>Audit Participants</b>															
Operation Leader – San Luis Potosi	DuPont - Mexico	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Safety Engineer - SHE	DuPont - Mexico	X		X					X	X					X
Cyanides Product Steward	DuPont - Mexico	X			X			X	X	X	X	X		X	X
Construction Leader / Senior Engineer	DuPont – Mexico	X					X								
Product Stewardship Manager	DuPont - US	X							X	X	X	X	X	X	X
Facility Owner	S.I.P.	X		X			X				X				
General Manager – San Luis Potosi	S.I.P.		X					X							
Operations & Warehouse Personnel – San Luis Potosi	S.I.P.		X	X	X	X		X	X	X		X	X		X

The results of this certification audit indicate that the DuPont San Luis Potosi Packaging Terminal is in FULL COMPLIANCE with Cyanide Code requirements.

DuPont San Luis Potosi Cyanide Packaging      *Nicole J. [Signature]*      September 11, 2010  
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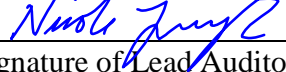
### Auditor's Finding

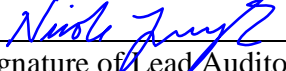
The DuPont San Luis Potosi Packaging Operation is in **FULL COMPLIANCE** with the International Cyanide Management Code.

Audit Company:	Management System Solutions, Inc. <a href="http://www.mss-team.com">www.mss-team.com</a>
Lead / Technical Auditor:	Nicole Jurczyk E-mail: <a href="mailto:CodeAudits@mss-team.com">CodeAudits@mss-team.com</a>
Date(s) of Audit:	April 14-15, 2010

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Certification 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 the Audit Reports accurately describe the findings of the certification audit. I further attest that the certification 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.

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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:*

The San Luis Potosi Terminal and Warehouse facility was built using sound, accepted engineering practices and quality control processes. Extensive QC & QA records regarding the construction of the packaging and warehouse facilities were reviewed and were found to be acceptable. Appropriate quality assurance and quality control, management of change documentation, drawing control, and equipment sign-offs were available to demonstrate compliance to Code requirements. Acceptable materials of construction are formally defined in DuPont Engineering Standards and a review of records confirmed that materials used conform to internal requirements.

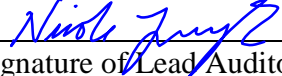
All loading operations and process equipment are under a roof of an open-air building within lined concrete secondary containment areas with concrete sumps. The production / packaging area has appropriate containment systems that ensure full containment with sufficient capacity in case of a storm event bringing rain water. There is no cyanide solution processed or packaged at this facility. Alarms and interlock systems stop the process and loading equipment in the event that there is an upset condition or a container that is being loaded becomes full. DuPont uses management system procedures and standard forms to inspect their interlocks, dust collection systems, process equipment, and containment systems regularly to ensure functionality and integrity.

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:*

DuPont has many detailed procedures that were specifically developed for this facility and operation that define how the facility is to be operated in a safe and environmentally sound manner. Standard operating procedures are used to systematically shut-down the process

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equipment if there is an upset condition. Operations personnel were interviewed and their awareness level of emergency and contingency procedures was very good.

Formal Process Safety Management (PSM) and Management of Change (MOC) processes are used to manage the operation and changes to any part of the operation. Job Cycle checks are performed regularly to confirm that actual practice fulfills procedural requirements and that no unintended changes have been introduced to the process. Process Safety Reviews and Job Cycle Check records were reviewed and were found to be acceptable. All process equipment and cyanide monitoring equipment is carefully maintained using formally defined procedures and checklists. Maintenance and calibration procedures were reviewed for process equipment, and Cyanide monitors. Records showed that required maintenance and calibrations according to manufacturer's recommendations are being completed as planned.

Procedures are in place to prevent unauthorized/unregulated discharge to the environment of any cyanide-containing water. This facility only packages solid cyanide briquettes. There are no water bodies near the facility. Rain and wash water is collected in secondary containment and is sent to a licensed company for disposal. A review of permits and records confirmed that there have been no unauthorized cyanide discharges. Comprehensive procedures are used for the management and disposal of cyanide and cyanide-contaminated solids. All cyanide is stored in buildings that were designed to protect the cyanide from water and have adequate ventilation and prevent the build-up of air-borne cyanide concentrations. The site has a secure perimeter and access to the facility is tightly controlled. Packaging procedures and DuPont internal controls ensure that cyanide is packaged, labeled, and placarded in accordance with requirements of the political jurisdictions through which the load will pass.

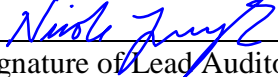
*Production Practice 1.3: Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.*

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

*Summarize the basis for this Finding:*

A review of records and results of interviews confirmed that process equipment, dust collection systems, and secondary containment areas are routinely inspected for their proper function, pressure level of the dust collection system, presence of cyanide in rain water, and deterioration of equipment and secondary containment areas. Operators were interviewed and completed inspection forms were reviewed. There are no cyanide solution tanks or process solution tanks or piping at this facility. Inspection frequencies were deemed to be sufficient to assure that equipment is functioning within design parameters.

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Inspections are documented and show the date of the inspection, the name of the inspector, and any observed deficiencies. Records demonstrated that any deficiencies noted during inspections were appropriately resolved in a timely manner.

**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**

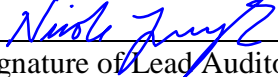
*Summarize the basis for this Finding:*

Worker exposure to cyanide is minimized through properly engineered systems with appropriate levels of ventilation, the use of detailed standard operating procedures, and proper use of personal protective equipment (PPE). The minimum PPE requirements are defined in each procedure. Operators, forklift drivers, and warehouse personnel were interviewed. Personnel showed excellent awareness of PPE requirements associated with different types of tasks under both normal and abnormal operating scenarios. Maintenance procedures are available and records showed that appropriate personnel had been trained on maintenance requirements.

Management of Change (MOC) and Pre-Start-Up-Safety Review (PSSR) procedures are used to evaluate the potential safety, health, and environmental impact of proposed and implemented operational changes and modifications. Worker input and feedback is an integral part of safety at DuPont. Operators are encouraged to suggest improvement ideas to management, and formal opportunities for operator feedback include Job Cycle Checks, Process Safety Start-Up Reviews (PSSRs), and Safety Meetings (Safety Pauses). An Occupational Health study was conducted early in 2010 to determine whether there are any work areas with potentially increased levels of air-borne cyanide of over 4.7 parts per million (ppm). The recommendations of the study were implemented and a stationary HCN monitor was installed in the one area that has a potential for having elevated cyanide levels. Additionally, personal HCN monitors are used by employees for specific tasks that have a potential for exposure to increased levels of cyanide. Procedures and records of calibration were reviewed and were found to be acceptable for all cyanide monitoring devices. Monitors alarm if air-borne cyanide concentrations go above 4.7 ppm.

The buddy system is used for all tasks. Employees have radios and access to alarm and process stop buttons throughout the facility in case of emergency. Employees' health is evaluated upon hire and periodically thereafter. Health exams are used to evaluate the employee general health and confirm fitness for duty. Records were available for 2008, 2009, and 2010 to confirm this practice. The clothing change policy for employees and visitors is documented and is very detailed. The operation has posted signs that limit access to storage and production areas. PPE signs are posted in appropriate locations. Eating, drinking, smoking, open flames are prohibited

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where there is a potential for cyanide contamination. Employees showed very good awareness of the restrictions and of the potential dangers of not following the rules. Eating is allowed in a designated lunchroom area and in offices. Smoking is restricted to a designated smoking area.

Although cyanide signs were not posted due to security concerns, all packaging, vehicles, and rail cars were cleared marked with appropriate labeling and placarding. The operations are not co-mingled with other operations and the auditor concluded that no additional signage specifically stating "cyanide present" was necessary.

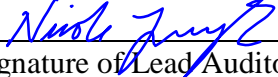
Production Practice 2.2: *Develop and implement plans and procedures for rapid and effective response to cyanide exposure.*

**The operation is  in full compliance with Production Practice 2.2**

*Summarize the basis for this Finding:*

DuPont maintains comprehensive Emergency Response Plans and procedures for rapid and effective response to cyanide exposure. The procedure for on-site treatment of cyanide exposure is very detailed and the response kit was complete. The Operations Leader and employees interviewed showed excellent awareness of emergency cyanide exposure response procedures. Non-acidic fire extinguishers, and industrial combination shower / low-pressure eye wash stations are located at strategic locations in the facility. The fire extinguishers are checked monthly and the eye wash/shower unit is checked daily. The facility has water, oxygen, resuscitator, antidote and a means of communication readily available at strategic points in the facility. Emergency equipment is inspected on a monthly basis. Emergency response equipment is stored and tested according to manufacturer's recommendations. Cyanide antidote medicine is stored in a number of locations, including a temperature-controlled office. MSDS and first aid procedures in Spanish are available to workers in operational areas. There are no process storage tanks or piping that contains cyanide solutions at this facility.

Decontamination procedures for employees, contractors, and visitors are outlined in formal procedures. Cyanide safety training is given annually and employees and supervisors demonstrated a very good understanding of the decontamination policy and the need for safety precautions. All employees are trained to provide first aid assistance to workers who may be exposed to cyanide. Formal procedures call for the decontamination of a cyanide exposure victim prior to transport. The DuPont Product Steward ensures that medical personnel in the local area surrounding the operation are trained on cyanide safety and response procedures. Training records for local doctors were available for review. The operation conducts mock emergency drills, holds a drill critique, and evaluates the need for further training or adjustment to the emergency procedures each year. Full incident investigation reports are filled out in the event of an incident. Records were available to show full compliance with Cyanide Code Worker Safety requirements.

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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:*

The facility does not have any requirements or demonstrated need to perform environmental monitoring. This part of the Cyanide Code is therefore deemed to be “not applicable at this time”. The facility does not discharge directly or indirectly to surface water. Water from the sumps near process areas and storage areas is sent to a licensed operator for disposal. There are no water bodies near the operation and there are no known spill events that could have impacted groundwater. There has been no known cyanide release by the site in that would have led to measurable air emissions. There is no processing or handling of cyanide solution and there is no known generation of measurable quantities of hydrogen cyanide gas. Dust collection systems are carefully monitored and maintained. This was deemed acceptable by the auditor.

**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:*

DuPont has a formal training program that includes cyanide safety training prior to the start of work and annual refresher training on all procedures. The training program discusses cyanide hazards and safety precautions. The training program is very well organized and records are maintained. Safety training records were readily available and complete. All personnel are trained on all of the operating and safety procedures. Personnel performing maintenance are also trained on maintenance procedures. Fork lift drivers also receive specialized training in order to perform their jobs safely. Procedures are complete with many photos and descriptions of safety and process requirements. All workers are trained prior to being allowed to work with cyanide.

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Personnel are trained on the use of personal protective equipment as part of the safety training and again during the on-the-job training done by supervisors. Employees are trained to perform normal production tasks to minimize risks to personal safety and the environment. Personnel are trained on each procedure. Awareness of procedural requirements was evaluated through interviews. Employees showed excellent awareness of procedural requirements for both normal and upset operating conditions. Experienced and qualified DuPont and S.I.P. personnel provide the training. Training effectiveness is evaluated through testing, regular Job Cycle Checks, and observation of on-the-job performance by a qualified person.

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 are trained on what to do if a cyanide release is discovered. This is part of the cyanide safety training and the training on the individual operational procedures. Employees are also trained on how to respond to a worker exposure to cyanide and drills are conducted annually to ensure that the emergency response skills remain fresh. Corrective actions are processed and emergency procedures are revised as necessary following drill critiques. Training records are maintained in each employee file. Records are maintained for at least as long as the employee is working at the site. All records pertaining to cyanide safety were sufficiently detailed to be found compliant to Cyanide Code and internal requirements.

**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**

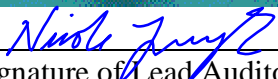
*Summarize the basis for this Finding:*

The Emergency Response Plan (ERP) and emergency response procedures were reviewed and found to be appropriate for the operation. Potential failure scenarios considered in the emergency response procedures include releases during loading operations, releases during fires and explosions, power outages, and cyanide spills. The emergency response plan and detailed

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support procedures for managing emergency situations fulfill Cyanide Code Emergency Response Plan requirements.

*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:*

DuPont involves operators and stakeholders, including potentially affected communities, in the emergency planning for the facility. The facility is located in an industrial zone and is not near residential areas. DuPont personnel perform outreach activities and training sessions with local emergency responders in strategic locations near the facility and along routes to the mines. Records were available to show that training and outreach sessions were performed by DuPont personnel in 2007, 2008, and 2009. Trainees included doctors, hospital personnel, mining personnel, fire fighters, and people from the civil protection agency. Records including training dates, attendees, and pictures were reviewed and found acceptable.

*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:*

DuPont Mexico offers cyanide safety training to stakeholders including employees, S.I.P. personnel, other supply chain partners, customers, emergency responders, and community members, as appropriate. Training records were reviewed during the March 2010 Mexico Supply Chain Certification Audit for years 2008, 2009, and 2010. DuPont offers Brigade Training for Emergency Response, Cyanide Handling / Safety, Defensive Driving, Cyanide Emergency Response Drills, and Fire Extinguisher training. Training is offered each year. Trainees included operations and warehouse personnel. Training sessions on cyanide safety and emergency response were also offered to mine customers, hospitals, fire fighters, and emergency responders in strategic locations. Records showed that DuPont allocates substantial resources to outreach programs and training programs to ensure that personnel are well prepared for a potential emergency situation.

The emergency response plan clearly designates full responsibility, authority, and duties for managing an emergency situation. Emergency Response Teams are identified and alternate coordinators are also identified in the ERPs. Call-out procedures including 24-hour contact

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information for coordinators and response team members are included in the plan. Records of training on the plan were sampled and were found to be acceptable.

Lists of necessary emergency response equipment are contained within the emergency plan. Additionally, the DuPont emergency response procedures detail the different types of personal protective equipment necessary for the different types of response scenarios.

The processes for maintaining emergency equipment is addressed in the San Luis Potosi emergency response plan. Emergency equipment is checked at least monthly. Records and interviews during the San Luis Potosi confirmed this practice.

*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:*

The notification procedures, including telephone numbers, are described in the Emergency Response plan for the facility. Internal and external emergency contact information is also contained in the Cyanide Emergency Information sheet. Notification numbers are checked at least annually. Extensive notification information is also contained in the "Cyanides Global Response Plan for Off-Site Incidents." For on-site emergencies at San Luis Potosi, notifications are made to personnel within DuPont first and to emergency responders, when necessary. The emergency response plans were last updated in 2010.

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

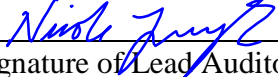
**The operation is  in full compliance with Production Practice 5.5**

*Summarize the basis for this Finding:*

DuPont maintains detailed procedures for the neutralization and decontamination of solids and contaminated debris. Additional details regarding the remediation, neutralization, decontamination, and disposal of clean-up debris are contained within the DuPont Global Emergency Response Procedures. Extensive descriptions of necessary action steps depending on the incident scenario are clearly outlined in the procedures.

The emergency response plan prohibits the use of treatment chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide. Interviews with DuPont personnel during

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this and previous Cyanide Code audits showed a high level of awareness that the use of treatment chemicals is prohibited if cyanide spills into surface waters.

*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:*

Emergency plans are checked at least annually. Many emergency drills are conducted at DuPont on an on-going basis. The DuPont Mexico team conducts drills with the San Luis Potosi operation, its transportation partners, warehouse partners, and customers. During the March 2010 Mexico Supply Chain Certification Audit records were reviewed for the extensive drills held in July 2008 and November 2009. Drill critiques were available after each drill and improvement opportunities were acted upon. Full incident investigations are conducted in the event that an actual emergency occurs.

San Luis Potosi was involved in all drills. One extensive man-down drill at the San Luis Potosi operation was thoroughly evaluated and excellent improvements were made to emergency response equipment thereafter. Schedules for 2010 activities were also reviewed and found to be acceptable.

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