

***INTERNATIONAL CYANIDE
MANAGEMENT INSTITUTE***

***Transportation Summary
Certification Audit Report***

Tanker Services
Food & Chemical Division
Vanderbijlpark, South Africa

12th February 2015

***For the
International Cyanide Management Code***



Signature Lead Auditor

TANKER SERVICES - TRANSPORTATION SUMMARY AUDIT REPORT

Name of Operation: Tanker Services Food & Chemicals Division.
Name of Operation Owner: Imperial Holdings
Name of Operation Operator: Imperial Logistics
Name of Responsible Manager: Mr. Ockert Breedt
Address: 30 Fairbanks Road,
Vanderbijlpark, Gauteng Province
Country: South Africa
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Location detail and description of operation:

The Depot deals with the transport of sodium cyanide solution and is situated at 30 Fairbanks Road, Vanderbijlpark, Gauteng Province, South Africa.

Tanker Services Specialised Products mainly transports Sasol products which include sodium cyanide solution, hydrochloric acid, sodium hydroxide solution, sodium hypochlorite solution and anhydrous ammonia, ammonium nitrate and polyvinyl chloride.

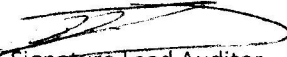
The operation took over the transportation of sodium cyanide solution from a Sasol subsidiary, Syloc, during June 2011, therefore Tanker Services operates as an individually certified transporter. In terms of the business agreement between Sasol and Tanker Services, Food and Chemical Division, all of the dedicated road bulk liquid cyanide tankers, truck tractors, the drivers, owner-driven tractors and their associated operating and maintenance records and documentation were taken over by the transporter.

The sodium cyanide solution road tankers and truck tractors are currently stalled on a dedicated properly fenced off area at the depot in Vanderbijlpark from where they are dispatched from to the consignor's premises to be loaded. After been loaded, 98% of the time the vehicles depart directly to the Consignees at various gold mines. Only a few road tankers are parked pre-loaded at the Depot and depart the following day. Night driving is not allowed.

Movement of vehicles are controlled from the offices at the Tanker Services Depot in Vanderbijlpark by utilising a tracking system.

Empty Sodium cyanide tankers will enter the Vanderbijlpark Depot for refuelling and documentation collection. Empty cyanide tankers are parked at the Depot.

When the tankers require any maintenance repairs to be performed, three (3) yearly pressure testing to be conducted or tanker to be sent for annual licensing and Certificate of


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Fitness, they are decontaminated at an SQAS approved tanker washing facility prior to any work being carried out on it.

As Sasol (product owner / Consignor) being the most knowledgeable on sodium cyanide, the transporter has entered into an agreement with Sasol that Tanker Services will arrange where and when on the various routes the product is been transported, for information sessions to be presented. The transporter will invite all the relevant role players. Sasol only presents the information.

With regards to the conducting of route risk assessments, this function has been taken over from Sasol and the transporter is sole responsible to conduct these.

Auditor's Finding

This operation is

X in full compliance
in substantial compliance *(see below)
not in compliance

with the International Cyanide Management Code.

Initial audit was conducted on 19th, 20th November 2014 and 5th December 2014
Follow-up audit: 12th February 2015.

During the initial audit conducted some non-compliance issues were identified and noted. During the follow-up audit the auditor noted that the transporter complied with all the requirements for recertification.

During the past three (3) years audit cycle (2012 – 2015) this operation hasn't experienced any cyanide incidents, product exposures, consignor complaints, consignee complaints or compliance problems.

The only mentionable incident was experienced and noted during the aforementioned period (29/6/2012), was when the left rear hub of one of their road tankers, filled with product, and whilst descending a downhill section of the road to Barberton in South Africa, overheated due to excessive braking by the driver, the bud overheated and subsequently the tyres caught fire. The road tanker remained intact with no product spilt or any person exposed to product vapours experienced during this incident.


Representatives of the transporter, the consignor and members from the emergency services attended to the scene of the incident. Incident investigation was launched and preventative recommendations were noted and implemented. During the recertification audit the auditor noted that the recommended preventative actions were implemented.

Copy of the incident investigation attached for information.

Audit Company: Private

E-mail : tommiemuller@tankerservices.co.za

Auditor: Tommie Müller


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Name and Signature of Transportation Auditor:

Name: Tommie Müller

Signature: 

Date: 3/4/2015

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 I meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

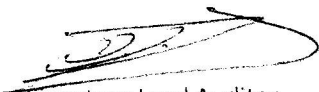
I attest that this Summary Audit Report accurately describes the findings of the verification audit.

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.

Signed: Tommie Müller

Auditor: 

Date: 3/4/2015


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TANKER SERVICES - TRANSPORTATION SUMMARY AUDIT REPORT

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

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

X in full compliance

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

Summarize the basis for this Finding/Deficiencies Identified:

Tanker Services have renegotiated the cyanide contract with the manufacturer of liquid cyanide and such contract have subsequently been approved.

Procedure for Route Risk Assessments are in place as well as a Route Risk Assessment guideline. All route risk assessments have been conducted in accordance to the procedure and guidelines. Route Risk Assessments are approved by their Management Procedure requires that route risk assessments be carried out on a two (2) yearly basis. Procedure sighted.

In accordance to the contractual agreement with Tanker Services, Sasol's responsibility for conducting and or reviewing of risks on the existing / new routes have been withdrawn.

Tanker Services operating as an individual transporter is responsible for the conducting of Route Risk Assessments of new routes and the reviewing of the existing assessments of all new routes.


Procedures required that RRAs be revised 2 yearly. RRAs have been revised and updated to cover the approved as well as the alternative routes.

The route risk assessments evaluate population density and formal and informal settlements, road surface, condition of road, impact of temperature on road surface, edges of tar roads (for deterioration), inclines adjoining roads and the possible effect should vehicles need to pull off the road, pitch and grade, and weather conditions.

The contents of the various route risk assessments were made known to the truck drivers. As part of their trip sheet documentation the latest Route Risk Assessment is included. RRAs are also addressed during driver briefing and de-briefing sessions. Driver Briefing and Debriefing procedures are in place.

Sasol as the cyanide producer and product specialist on invitation of Tanker Services, conduct "Cyanide Awareness Road Shows" to inform and update all various relevant stakeholders on the routes with regards to cyanide product info, product awareness and cyanide emergency procedures.

During 2013 meetings were held with police services, Fire Departments, Traffic officials, Ambulances, Disaster Managements and doctors. Presentations and minutes of these meetings were sighted.


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According to the manufacturer no escorts of cyanide transport is required in South Africa, unless required by consignee. Travelling with a consignment of cyanide through Zimbabwe, their EMA requires escorting of such consignments. To comply with legislation, the Consignees in that country provide these escorts.

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

X in full compliance

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

Summarize the basis for this Finding/Deficiencies Identified:

Drivers employed as dangerous goods drivers must be older than 25 years of age. SA legal requirement and must be medically fit for the duty.

Drivers are legally licensed as Category "D" (Dangerous Goods) drivers, and is renewed every two years. Drivers have attended and passed their dangerous goods training course as required by the South African National Road Traffic Act and the SABS code of practice number SANS 10231:2010. Dangerous goods training for drivers transporting classified goods are required to attend and pass dangerous goods training course (practical and theoretical) which must be presented by and approved and registered training institution. Training of such is an annual requirement by SA law. Certificates as well as training course material sighted. Drivers have also attended and passed their 2 yearly level 1 basic first aid training course. Certificates are still valid. Certificates sighted. Training and legal requirements for drivers are included in an Excel spreadsheet-based training matrix.

Certain mines require that drivers are trained in their off-loading procedures before being permitted to enter the mine and off-load. Training in the off-loading procedures is done annually. Driver training includes cyanide awareness, use of PPE, fire fighting, cyanide first aid and mine off-loading procedures.

All depot maintenance staff is trained in cyanide awareness.

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

X in full compliance

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

Summarize the basis for this Finding/Deficiencies Identified:

Tanker Services utilises dedicated liquid cyanide bulk road tankers. These road tankers in use are manufactured in accordance to SANS (South African National Standards) Code 1518 which addresses the basics of chemical tankers design. The company is in possession of these technical specification covering tank design, type, tare weight, weight distribution, coupling height and dimensions. Currently 15 road tankers are in use and to date no new cyanide tankers have been purchased.


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Consignor (Sasol) is responsible for the loading of the road tankers. Loading booms have level probes fitted which ensure that road tankers are not over filled. Prior to departure from consignor's premises, vehicles need to proceed over a weighbridge to check the mass been loaded. Weighbridge is programmed not to print a weighbridge ticket if the load is above the legal ticket limit and even under loaded. Dedicated cyanide loading gantries and dedicated cyanide tankers are used. Electronic weighbridge calibrated every two years. Weighbridge calibration certificate expires 11th February 2016. Weighbridge is maintained by the manufacturer / consignor. Procedure in place to deal with overloaded tanker (MRD-WIS-GEN-5900 dated 7/11/2006 (Off-loading of an overloaded cyanide tanker.)

Road tankers are registered individually on the Sasol weighbridge system. Loading facilities are fitted with a level control system which ensures that road tankers are not loaded beyond its predetermined capacity per compartment.

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

X in full compliance

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

Summarize the basis for this Finding/Deficiencies Identified:

Cyanide is transported in dedicated pressure vessels (Bulk Tankers) which conform to the South African Standard code of practice, SANS code 1518. In terms of South African legislation pressure vessel are to be subjected to pressure tests every 3 years or whenever required. These tests were done by an accredited company and certificates reflecting the outcome was issued and on file.

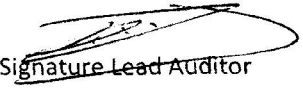
Transport signage format and styling is dictated by South African Road Traffic Act, Act 93 of 1996 and SABS Codes of Practice, SANS code 10231; 2012. Tankers travel within National borders of the RSA, that of Zimbabwe and Botswana. Signage displayed on vehicles was checked during site walk about on site. The format and styling of the placarding is accepted by the SADAC countries.

Placarding conform to the legal requirements. Correct product UN number, the transporters telephone number, specialist advise telephone number and product hazard decal displayed on placard. Noted tanker placards been fitted on left, right and rear of the road tanker. Orange diamond fitted to the front of the truck tractor.

Pre-trip checklist is done by driver prior to departure from Depot. Document "Vehicle Daily Pre-start Checklist" in use and all relevant signage are checked prior to leaving the depot.

At consignor's premises placards are also checked as part of their vehicle inspection procedure. Before access to end users premises is allowed, users conduct verifying checks (pre-entry at mine inspection checklist).

Dedicated road tankers are used for the transportation of cyanide. At random vehicle and placard checks are conducted by Controllers. Findings documented on Pre-trip checklist where after a "Vehicle Repair Voucher" is generated and directed to workshop for repairs. Workshop Foreman conducts monthly equipment service.


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Tanker Services uses the vehicle preventative maintenance manual for the servicing and service interval of their vehicles as prescribed by their umbrella Company, Imperial Logistics. This procedure manual includes maintenance procedures, workshop instructions, preventative maintenance forms, and internal audit requirements and documentation.

Vehicle maintenance files, service and maintenance records were reviewed, as well preventative maintenance forms which included truck tractor service, truck tractor and tanker trip checks. The maintenance records of the owner-drivers vehicles are reported to Tanker Services and these records are incorporated into Tanker Services maintenance database to ensure service intervals are consistent with manufacturer's recommendations. Service records of owner-driver vehicles were noted and found to be up to date. One of the issues namely checking of braking system on vehicle is included in the service records.

Trip scheduling is done internally using manual planning. The commercial contract between the transporter and the consignor a trip limitation of 14 hours per day is agreed upon. The legal status is that drivers are not allowed to drive more than 14 out of the 24 hours per day. Driver Trip sheet indicates starting time and the time back at the Depot on ending of journey. Trip planning also tracks driver's operating times, which is backed up by satellite tracking.

Information on weather and road conditions is provided by the South African National Weather Service, the South African Road Freight Association and Sasol.

Tanker Services has a Drug and Alcohol Abuse Policy statement which prohibits the use, possession, distribution and sale of alcohol/illegal drugs. Policy has been signed by their CEO and a copy is also included into their driver's manual. Policy sighted.

Any person entering the depot is required to be subjected to an alcohol breathalyser test, Only when a negative reading is displayed on the device, such person will be allowed onto the the Depot premises. If during pre-employment medicals examination is traces of alcohol or illegal drugs is noted, the individual will not be employed. If detected during routine medicals, policy dictates a program of support and counselling before dismissal. Drug abuse forms a part of the on-going rotating safety management program.

Transport Practice 1.5: Follow international standards for transportation of cyanide bysea and air.

X in full compliance

The operation is in substantial compliance **with Transport Practice 1.5**

not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

This section is not applicable as no modes of air or sea transport are used.


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

X in full compliance

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

Summarize the basis for this Finding/Deficiencies Identified:

The main means of communication between driver and Transport Company is via cell phone. The driver does not communicate with the mining operation, cyanide producer or emergency responder. A Company cell phone is allocated to the truck driver. During walk about mobile phones were noted and checked for functionality. Drivers also have personal cell phones as back-up. Daily trip checklist and briefing session includes check/verification of cell phone functioning.

Communications blackout areas are identified during the route risk assessments where they exist but are found to minimal. In such cases, alternate arrangements are made which include telephone report-ins at beginning and end of the blackout area and escort of vehicles, where required, through blackout areas.

Tanker Services Controller at random calls the drivers en route to determine their position and compare that info with the image on the tracking system.

For deliveries to be done across the SA borders where cell phone signals are poor and some areas non-existent, satellite phones were acquired to establish communication whilst travelling in that country.

All truck tractors are fitted with a Altec tracking device. System is manned 24/7. The Satellite Tracking System is used for constant monitoring the movement of the consignment and it is done from the Tanker Services Control Room. System sighted and found to be operative.


The Trip Planner submits a list of deliveries the day before and the tracking system monitors the journey/s and checks any deviations from route or route plan. The operability of the tracking system is checked daily and that of the driver's cell phone during briefing session.

After been loaded the outlets on the road tanker are sealed and product is kept under a positive pressure inside the road tanker.

The vehicle carries a Tremcard, the product MSDS, a trip sheet, delivery document, and weighbridge ticket. The South African legislation requires is the Tremcard related to the product must be available in the vehicle's "dedicated space" (legal specification) and the customer must have a copy of the MSDS.

The mass on the road tanker is indicated on the Dangerous Goods Declaration, the weighbridge ticket as well as on the delivery documentation.

Verified all required documentation available in the designated space inside the cab. An updated MSDS for the product was noted inside the designated space inside the cab. In terms of SA requirements, a MSDS revision date must not be older than 3 years. MSDS conformed to this. Tanker Services management immediately contacted the Consignor who provided the product MSDS with the correct UN number.


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

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

X in full compliance

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

Summarize the basis for this Finding/Deficiencies Identified:

At times when pre-loading of tankers is done, road tankers are parked in a pre-determined and dedicated parking area. This area is fenced off and gates are locked. Filled road tankers occasionally been parked inside the dedicated cyanide tanker parking area which is situated on the premises of Tanker Services. All pre-loaded tankers leave the parking area within a 12 hour period from being parked to deliver product to end users.

The parking area for road tankers is fenced off and the gates kept locked at all times. Keys are kept with the security officer on duty. Only security officers are allowed to unlock the entrance gates. Area is patrolled by security staff 24/7. Area is properly lit at night time. Tanker keys held in a lockable key box. No key controls register available at the Security office. It is recommended that a key control register be implemented at the Security office to control the issuing of vehicle keys. Visitors control register in use at parking area. It is furthermore recommended that a further column be inserted on the access control register requesting the purpose for the person/s entering this area.

Signage physical observed. "No smoking", "No eating / drinking", "No open flames", required PPE safety signage displayed. Signs are clearly displayed and visible from a distance. Fence around the parking area in a very good condition.

Appropriate and relevant symbolic safety signage is displayed against the fence. Skull and cross bone signs are displayed as well as the name of the product kept in this area as well as two signs indicating the hazards of the product that is kept inside the fenced off area. Signage is well visible and legible. The minimum PPE that is to be worn when entering the parking area as well as when handling cyanide is clearly indicated by the appropriate symbolic safety signage.

The entire parking area is so designed and built (after an EIA was done) that in the unwanted event of a leakage, no ground pollution can take place. Beneath paving is a thick plastic layer which creates an impervious surface. Any leakage can be contained. Parking area is way away from the area where the other vehicles are parked.


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

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

X in full compliance

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

Summarize the basis for this Finding/Deficiencies Identified:

Procedure for handling for on-site and off-site emergencies is in place including the ERG. A Tanker Service Emergency Contact Process / List is available. Sighted document SOP-ER-01-01 dated 20/10/2011. Auditor sighted the Off-site response procedure and the Registration Certificate of a Spill Response Company, IFRT, dated 23/2/2015. IFRT, a spill clean-up service provider has enter into a contract with Tanker Services and subsequently been accepted by the Consignor as well.

Both procedure and certificate was verified for validation. IFRT certificate expires 24/2/2016

Emergency response to cyanide releases associated with transportation is channelled through the Tanker Services Depot where after they activate their Emergency Response Protocol for off-site incidents. Appropriate response teams, based upon geographical location and circumstances will be mobilised.

IFRT has a fully equipped Sasol Cyanide Emergency Response Trailer on their premises. The service provider functions as a Emergency Response team for cyanide transportation incidents on route as well for depot incidents.

At a couple of venues along the route where cyanide is transported, Sasol have placed fully equipped Cyanide Emergency Response Trailers with approved spill responders who can act as first responders on an emergency call, awaiting the arrival of the Tanker Services and Consignor's Spill Response Team.

Sasol requires that the contents of these trailers are checked on a monthly basis of which the completed checklist must be reverted to Sasol as proof that the equipment have been checked and still in a operative condition. Sasol also perform unannounced visits to these centres to check the credibility of the checks that has been done.

A similar visit was performed by the auditor to a station in Welkom, in the province of the Free State, South Africa. Trailer and equipment were found to be in order and checked daily.

Tanker Services will not be directly involved in response as their role during an emergency situation is one of providing assistance where and when required. The entire emergency situation is handled by the local Emergency Services in the area where the incident took place, the transporter and the consignor..

Tanker Services in conjunction with the Consignor scheduled a cyanide mock drill to be held during mid 2015.


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

X in full compliance

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

Summarize the basis for this Finding/Deficiencies Identified:

Tanker drivers and Hazmat service providers are fully and comprehensively trained by Sasol. Career development training plan at Tanker Services available for the retraining of drivers, etc.

On request of Tanker Services, the emergency response service provider, IFRT, have been trained by Sasol (being the most product knowledgeable) in cyanide awareness, basic cyanide first aid and emergency response. The same type of training has been presented to their own emergency team as well as the Tanker Services drivers. Training is refreshed annually.

Emergency response to cyanide releases associated with transportation is channelled through Tanker Services Depot where after they activate their Emergency Response Protocol for off-site incidents and who will mobilise the appropriate response teams, based upon geographical location and circumstances. Cyanide emergency response has also been contracted to a spill response company.

IFRT being an approved spill response and cyanide first aid service provider and provide a service to Tanker Services.


IFRT has a fully equipped Sasol Cyanide Emergency Response Trailer on their premises. The service provider functions as a Cyanide Emergency Response team for cyanide transportation incidents or depot incidents. Tanker Services utilises their own cyanide emergency response team as well as an approved specialised Emergency Response Service Provider.

Thirteen (13) emergency trailers equipped with equipment stationed at various posts on route to the end users within the border of South Africa e.g. Smithsfield, Matjhabeng (Welkom), Potchefstroom, Fochville, Klerksdorp, Nelspruit, Upington, Polokwane, and Matjhabeng. In Zimbabwe there is two (2) (Harare and Bulawayo) and one (1) in Botswana (Francistown).

Training and awareness sessions for medical, emergency staff and traffic officers were held to understand cyanide emergencies. Zimbabwe ER protocol Ref. ERGB No. 157 refers.

Fully equipped cyanide emergency trailers left with approved spill responders on the various cyanide routes who can act as first responders to an emergency call, awaiting the arrival of the Tanker Services Spill Response Team and the consignor's representatives.

Sasol requires that the contents of these trailers are checked on a monthly basis of which the completed checklist must be reverted to Sasol as proof thereof and still in a operative condition.


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Sasol also perform unannounced visits to these centres to check the credibility of the checks that has been done.

A similar visit was performed by the auditor to a station in Welkom, in the province of the Free State, South Africa. Trailer and equipment were found to be in order and checked daily

Tanker Services do not have its own cyanide emergency response equipment but make use of the service providers (IFRT). Every driver has been issued and trained in the use of their protective suit, face shield, eye protection, hard hat, respirator and appropriate canister, yellow gum boots, and PVC gloves.

Driver Mr. Andries Mahlaku was interviewed on the fitting and wearing of the full face mask. Employee found to be conversant on when and how to use it and capable in fitting the mask correctly. Proof of training noted on driver's file.

Depot staff will raise the alarm and evacuate, allowing IFRT to handle situation. IFRT will respond within 10 minutes. IFRT have a Sasol cyanide emergency response trailer at their premises. The Workshop is currently the only possible cyanide source (abnormal maintenance scenarios) and maintenance staff all received cyanide awareness training.

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

X in full compliance

The operation is in substantial compliance with Transport Practice 3.3

not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

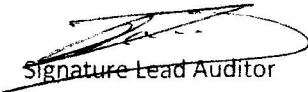
A written plan for dealing with on-site and off-site emergencies currently in use. SQAS Ref No 2.1.3.1 refers

The transporter has a protocol which stipulates who should be contacted in the case of any transport related incident. SQAS Ref No. 2.1.3.2f "list of the different parties to be informed with their contact details (customers, authorities, etc) refers. Proof of document and reporting notices, noted nu auditor.

Transporter do have a list of emergency telephone numbers which is available at Depot's reception, with the Depot Manager, the Control office, Tanker Services Safety Officer and the Consignor's Call Centre. Tanker Services Cyanide Emergency Procedure includes updated contact information for medical, fire and emergency authorities, spill response and clean up service providers, regulatory notification contacts, Sasol's Call Centre and Tanker Services 24 hour control room. This procedure requires these actions

Tanker Services have formally appointed employee as an Emergency Controller of which one of his duties is to keep the emergency contact telephone list updated. Appointment and updated ERP been noted.

"En-route / Onsite / Departure Response" procedure Rev 1 dated 12/12/2014 sighted. Documented procedure with SQAS reference No. 1.2.1.1 in place for recording and investigating non-conformances / accidents / incidents.


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South African National Environmental Management Act requires that any spillage of a chemical must be reported to the Department of Environmental Affairs. Transporter have formally appointed one of their employees as an Emergency Controller of which some of his duties is to keep the emergency contact telephone list updated and to submit reports to Governmental Authorities. ERP been updated yearly. Plan contains list of emergency telephone numbers. En-route / Onsite / Departure Response procedure Rev 1 dated 12/12/2014 in use. Reporting document available and noted by auditor.

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

X in full compliance

The operation is in substantial compliance **with Transport Practice 3.4**

not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

SOP Admin dated 4th July 2007 and SOP Ref No. SOP 02 dated 4th November 2010 clauses 6.4 to 6.6 associated with on an off-site Cyanide incidents refers. SOP's sighted. It was recommended that SOP's be revised as some dates back to 2007.

Remediation procedures are applied by IFRT which are based upon National requirements. IFRT uses Tanker Services procedures for clean up which include prohibitions of the use of cyanide treatment chemicals near surface water.

The consignor do not recommend that Tanker Services uses sodium hypochlorite, ferrous sulfate or hydrogen peroxide for the purpose of neutralising sodium cyanide. Ferrous Sulphate must only to be used to detect traces of cyanide.

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

X in full compliance

The operation is in substantial compliance **with Transport Practice 3.5**

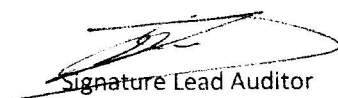
not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

A procedure was found to be in place which stipulates that reviews of documentation be done with a maximum of once per year or after a significant incident or after a mock drill. Procedure Ref No T1-002 dated 1st June 2012 refers.

Tanker Services in conjunction with the Consignor have scheduled a cyanide mock drill to be held during mid 2015 during which all emergency responders, transporter and manufacturer and other stakeholders will be involved, to test current appropriate emergency response and competency of emergency responders and to identified any improvements.

The incident that occurred during June 2012 was used as a mock drill exercise.


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